Dual Citizenship Policies of Unrecognized States in the Post-Soviet Space: Comparative Case Study of Abkhazia and Transnistria

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Abstract

In the last three decades there has been a global trend towards the acceptance of dual citizenship among sovereign states. Similarly, unrecognized states have come to accept dual citizenship, albeit in varying degrees and for the same reasons. However, limited work has been done on dual citizenship policies of unrecognized states, with no comparative research been done amongst the unrecognized states in the post-Soviet space. This inter-disciplinary and explorative research has worked towards answering the question of what factors contribute to the adoption of divergent dual citizenship policies by unrecognized states in the post-Soviet space? By comparing Abkhazia and Transnistria, two cases having similar historical and political circumstances but having contrasting dual citizenship policies, it was possible to identify the contributory factors to these divergences. It was found that utilitarian concerns based on the need to improve the citizens' welfare, the existence of a diaspora, the type of national identity (civic/ethnic), and the level of influence exerted by the patron state – Russia, all contribute in varying degrees to the level of liberalness of the two unrecognized states' dual citizenship policies.

Key words: dual citizenship, *de facto* states, unrecognized states, identity

Acknowledgements

Contents

Acronyms

ASSR – Autonomous Soviet Socialist Republic

CIS – Commonwealth of Independent States

ICCPR – International Covenant on Civil and Political Rights

ICESCR – International Covenant on Economic, Social and Cultural Rights

MSSD – Most Similar Systems Design

OSCE – Organization for Security and Co-operation in Europe

PMR – Pridnestrovian Moldavian Republic

RA – Republic of Abkhazia

SSR – Soviet Socialist Republic

UNGA – United Nations General Assembly

USSR – Union of Soviet Socialist Republics

Chapter 1 – Introduction

The creation and implementation of citizenship policies is an important component of functioning states. Over the years, states have developed complex citizenship policies that dictate who can be considered or who can become a citizen of that state. These citizenship policies are significant because they promote the inclusion or the exclusion of a group of people based on their ethnic, civic, cultural or religious identity.

A significant component of the debate on citizenship policies has been on dual citizenship. On an individual level dual citizenship has generally been considered to be advantageous as dual citizens are able to enjoy benefits and privileges offered by both countries of citizenship. That said, for much of modern history states have opposed dual citizenship as they considered it to result in divergent political allegiances and to threaten the sovereign authority of the state (Blatter, 2011; Pogonyi, 2011). However, research shows that in the last three decades there has been a global trend towards the acceptance of dual citizenship among sovereign and recognized states, and this acceptance is seen as a "symbol of membership in an increasingly global society" (Dahlin & Hironaka, 2008, p.68). Some states *de jure* allow dual citizenship (e.g. Australia), others allow it under certain conditions, and some states allow dual citizenship *de facto* (e.g. USA). Thus, it must be noted that the acceptance or non-acceptance of dual citizenship is not a binary variable, but rather that there is a continuum for the acceptance of dual citizenship. This continuum can range from "no acceptance of dual citizenship" (e.g. Fiji, Indonesia), to being allowed only with certain countries (e.g. Spain, Tajikistan), to almost "unrestricted acceptance of dual citizenship" (e.g. Australia, Canada), with special provisions for migrants and diaspora adding to the level of acceptance of dual citizenship (*see Appendix, p.59*).

By 2013, 141 of UN member states allowed their citizens to hold dual citizenship in at least some form (UN DESA, 2013)[1]. This has led to an increasing number of individuals who come to possess multiple citizenships, which has further complicated the already complex citizenship laws. One explanation for this rise in acceptance has been the increasing

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[1] Also see
http://www.un.org/en/development/desa/population/publications/pdf/policy/WPP2013/Summary_Tables/WPP2013_TableV_8.pdf

cross-border migration (Howard, 2005; Glazer, 2010; Blatter, 2011; Wallbott, 2014). Dual citizenship allows migrant-receiving countries to better integrate them into society, whereas it allows migrant-sending countries to maintain strong ties with their expatriates/diaspora. Another observation is that states, which promote liberalism and individual rights, are more likely to allow for dual citizenship (Dahlin & Hironaka, 2008; Blatter, 2011; Pogonyi, 2011). Lastly, it has been suggested that the type of citizenship identity also influences whether a state allows dual citizenship (Dahlin & Hironaka, 2008). According to this argument, states with a civic (inclusive) citizenship identity or a postnational citizenship identity are more likely to accept dual citizenship.

Despite the vast amount of research in this field, limited work has so far been done on dual citizenship policies in unrecognized states (i.e. *de facto* states), particularly in the post-Soviet space (e.g. Clogg, 2008; Artman 2013). Background research shows that all unrecognized states allow dual citizenship, albeit in varying degrees. However, as will be discussed in the subsequent chapters, a point of interest is that the factors and reasons that influence unrecognized states to adopt dual citizenship go beyond those of recognized states. That said, just like in recognized states, the factors that impact dual citizenship policies in unrecognized states also occur in varying degrees, producing a similar continuum of acceptance as outlined above. Thus, this research will show that in addition to the varying degrees of influence from migration, national identity politics, and democratic aspirations, unrecognized states' dual citizenship policies are also influenced by utilitarian concerns (e.g. easy access to international travel) and influence from their patron state[2].

To explore the reasons behind the divergent policies on dual citizenship, this thesis will use a Most Similar Systems Design (MSSD) research and compare the citizenship policies of two existing unrecognized states in the post-Soviet space: the Republic of Abkhazia and the Pridnestrovian Moldavian Republic (PMR) (i.e. Transnistria). This research will focus on these two cases as they are ideal for a MSSD comparative case study because they have the most divergent dual citizenship policies, with the former allowing dual citizenship only with the Russian Federation while the latter places no restrictions on dual citizenship. This is in spite of the two countries having emerged historically in a similar fashion and being

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[2] Patron states can be defined as recognized states that, based on ethno-cultural links and/or geo-political interests, choose to support an unrecognized state through economic, military, and diplomatic assistance (Caspersen, 2012, pp.54-55).

subjected to similar political circumstances that could impact citizenship policies. In order to conduct this analysis, this research will rely on legal, academic, and non-academic documents, as well as in-depth expert interviews.

Thus, using the aforesaid analysis this research envisages answering the following question. **What factors contribute to the adoption of divergent dual citizenship policies by unrecognized states in the post-Soviet space?**

It is important to note that there is possibly a considerable gap between *de jure* and *de facto* acceptance of dual citizenship. Therefore this thesis, while keeping a solid foundation on the *de jure* policies, in order to comprehensively analyze the policies, will also take into account the practical application and implications of the citizenship policies.

This thesis is structured as follows. Chapter 2 establishes the conceptual framework by discussing the core terms citizenship, dual citizenship, and the unrecognized state. Chapter 3 will discuss the existing literature on reasons behind the acceptance of dual citizenship in both recognizes and unrecognized states, as well as formulate hypotheses to answer the research question. Chapter 4 will introduce the MSSD methodology and outline its comparative advantages for this type of research. Chapter 5 will use the MSSD research methodology to test the hypotheses and answer the research question. Finally, Chapter 6 will summarize the findings of the research, along with the caveats and possible areas for future research.

Chapter 2 – Conceptual Framework

2.1 Nationality and Citizenship

A *nation* is an *imagined community* comprised of members united by common descent, geographic origin, ethnicity, language or culture (Anderson, 1991). Members of such a community develop a common identity simply by being associated with a particular *nation*, and thus are considered to have the *nationality* of that *nation*. This common (*national*) association can also result in a political association, which can be employed in the process of state building and therefore in the formation of the nation-state[3].

As a consequence of this political association, members are conferred with citizenship, which is "a status bestowed on those who are full members of a community. All who posses the status are equal with respect to the rights and duties with which the status is endowed" (Marshall, 1950, pp.28-29). Being a citizen of a state provides the bearer with economic, political, and socio-cultural rights within that state. In turn, a state has the responsibility to protect its citizens within and beyond its borders. Glazer (2010) goes on to add that citizenship encompasses "two very different things, one a legal status, and the other the emotional attachment which it is assumed comes with it" (p.6818). The above is also echoed by Bloemraad et al. (2008, p.154), who disaggregate citizenship into four components: a legal status (granted by a state), rights conferred through that status, political participation in society, and the emotional attachment that accompanies it. Thus, particularly through the last component, just like *nationality*, citizenship is also associated with individual and collective identity (Boll, 2007, p.4).

Conventionally "notions of citizenship delineate national identity and membership in a single ethno-cultural or national community" (Dahlin & Hironaka, 2008, p.55). In other words, to be a citizen, a person must have a strong ethnic or cultural connection to the nation-state. Such states (e.g. Japan, India) follow the *jus sanguinis* principle, where individuals can become citizens only if their parents are citizens of that state. On the other hand, some states have taken a more inclusive/assimilative policy in constructing their national identity, such as

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[3] For the purposes of this research the Oxford Dictionary definition of a nation-state will be used. It is a "sovereign state of which most of the citizens or subjects are united also by factors which define a *nation*, such as language or common descent". Retrieved from https://en.oxforddictionaries.com/definition/nation_state

France, which bases citizenship on the *jus soli* principle, as it considers all individuals born within the borders of the French Republic as French citizens, regardless of ethnic identity. It must be noted that while all countries follow the *jus sanguinis* principle, only a fraction follow the *jus soli* principle together with the *jus sanguinis* principle[4]. The next most common way of acquiring citizenship, after the two principles just mentioned, is through naturalization, which refers to the legal process of a non-citizen acquiring citizenship after coming to fulfil several requirements determined by the citizenship-issuing state, like for example an extended period of domicile in the country. Such inclusive policies often create compound national identities such as *Dutch citizens of Moroccan origin* and *Germans of Turkish origin*.

It is common for English language literature on citizenship to use the terms "citizenship" and "nationality" interchangeably, even though (in social sciences) nationality has an ethnic connotation[5]. Conversely, in Public International Law, "nationality" is used to signify the legal bond between the individual and the state, notwithstanding an individual's ethnic background, origin or identity, while the term "citizenship" refers to an individual's rights/duties under a state's municipal law (Boll, 2007, p.58)[6].

However, since this research is political in nature, it is not actually necessary to differentiate between citizenship and nationality as used in Public International Law. Nonetheless, in order to ensure consistency, this thesis will give preference to the term "citizenship" (as defined by Bloemraad et al., 2008), but will synonymously use the term "nationality" (as used in International Public Law) if required. When exclusively referring to the socio-cultural concept of nation and nationality, as described in the first paragraph of this section, the term "nationality" will be italicized (i.e. *nation*/*nationality*).

2.2 Dual Citizenship[7]

Traditionally, an individual was expected to express loyalty exclusively to a single sovereign

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[4] Even though theoretically possible, there are no examples of countries that follow the *jus soli* principle without following the *jus sanguinis* principle.

[5] However, other languages may have strictly differentiated meanings for citizenship and nationality. For example in Russian, *Ruskii* refers to one's *nationality* that is tied to one's ethnicity, while *Rosiyanin* (also translated as Russian) refers to one's citizenship. For further examples on the differences in the meaning of citizenship and nationality in countries see http://eudo-citizenship.eu/databases/citizenship-glossary/terminology

[6] For further discussion on the differences in meaning of citizenship and nationality in law read Boll (2007, Chapters 1-2).

[7] This research notes that individuals may also have more than two citizenships. However, for the purpose of simplicity dual citizenship, unless explicitly stated, will also signify multiple citizenships.

and thereby possess only a single citizenship. States believed that multiple citizenships would result in divergent political allegiances, threaten the sovereign authority of the state, and dissipate patriotism (Blatter, 2011, pp.780-781; Pogonyi, 2011, pp.687-688). Furthermore, as states relied on military conscription and taxation for the maintenance of their sovereign status, allowing dual citizenship would have undermined this relationship (Blatter, 2011, p.778)[8]. As a result, citizenship became a highly securitized issue, and the opposition to dual citizenship was confirmed through domestic (e.g. Bancroft Treaties) and international laws including the 1930 Hague Convention on Nationality (League of Nations TS 179 №4127, p.89) and the Convention on the Reduction of Multiple Nationality and on Military Obligations in Cases of Multiple Nationality (Council of Europe ETS 43, 1963).

However, in the post-World War II period, due to the professionalizing of militaries, the reduction of interstate conflict, changes in tax codes, exponential increase in migration and economic interdependence, spread of human right norms, and the process of decolonization and state secession the concept of citizenship has evolved (Hailbronner, 2003, pp.19-26; Howard, 2005, p.703; Dahlin & Hironaka, 2008; Pogonyi, 2011). These changes have fostered a greater acceptance of dual citizenship and led to its de-securitization. This in turn can be interpreted as "a crucial step away from the conceptualization of political communities as exclusive and non-overlapping entities" (Blatter, 2011, p.791).

Dual citizenship theoretically grants the individual the ability to exercise their rights and obligations in both countries and to claim protection from either government (Glazer, 2010, p.6814). However, in practice there can be limitations, such as dual citizens not being legally allowed to hold public office (Martin, 2003, p.17). Also, due to the "master nationality rule", which states that "a State may not afford diplomatic protection to one of its nationals against a state whose nationality such person also possesses" (League of Nations TS 179 №4127, p.89, Art. 4), an individual may have limited diplomatic protection when present in one of their countries of citizenship.

Generally speaking, dual citizenship can be acquired through the following ways (Sejersen, 2008, p.529)[9]:

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[8] For a detailed discussion on the arguments against dual citizenship see Martin (2003, pp.11-18).
[9] When discussing dual citizenship this research will limit itself to the analysis of dual citizenship policies that affect adults, since a state's dual citizenship policy towards minors is often different from its policies towards

i)   birth to parents with non-identical citizenship, and both states allow for the inheritance of citizenship through *jus sanguinis* legislation;

ii) being born in a state having *jus soli* legislation, to parents from a different country that allows for the inheritance of citizenship through *jus sanguinis* legislation;

iii) naturalization or marriage without the need for renouncing previous citizenship(s);

iv) through other paths such as acquiring citizenship through investment (e.g. Grenada, Malta) or the Law of Return (e.g. Germany, Israel).

Having discussed the concepts related to citizenship and dual citizenship, the following section will address the phenomenon of unrecognized states. Subsequently, this thesis will link the two areas of study by discussing the phenomenon of citizenship in unrecognized states.

2.3 Self-determination and the unrecognized state

The emergence of unrecognized states[10] is closely tied to the concept of self-determination and secession. Following World War II and the establishment of the UN, the international community committed to officially recognizing the "principle of equal rights and self-determination of peoples" (UN Charter, 1945). UNGA Resolutions, such as the Resolution on the Granting of Independence to Colonial Countries and Peoples, further confirmed this right by proclaiming that UN member states should take steps in "territories which have not yet attained independence, to transfer all powers to the peoples of those territories … in accordance with their freely expressed will and desire" (UNGA Doc. A/RES/1514(XV), 1960, Art.5). The spread of this norm led to the rapid process of decolonization resulting in the creation of *new* recognized states.

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adults. Most countries that prohibit dual citizenship (e.g. India, Japan), do in fact allow minors to maintain dual citizenship, but upon reaching the age of majority they are *de jure* required to choose just one citizenship. Therefore, in the context of this reaserch all such countries are considered to prohibit dual citizenship.

[10] The single biggest event that resulted in the emergence of the greater number of unrecognized states following World War II is the fall of Communism. In the post-Soviet space there have been at least eight entities that declared independence; Chechnya, Crimea, Gagauzia, Tatarstan, Abkhazia, South Ossetia, Transnistria, and Nagorno-Karabakh. Of them, however, only the latter four have achieved *de facto* statehood. Another region where several entities declared independence was the former Yugoslavia. These entities were the Dubrovnik Republic, Kosovo, Republika Srpska, Republika Srpska Krajina, and Western Bosnia. Among them only Kosovo gained *de facto* statehood. Additionally, Montenegro can be considered to have been a *de facto* state during the period 2000-2006, after which it gained recognition from Serbia and the international community.

Beyond the context of decolonization, the legal basis for the right to self-determination was first established in 1966 through the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR), where *all* peoples were recognized to have the right to self-determination. This right was also recognized by the General Assembly, which stated that "all peoples have the right to freely determine, without external interference, their political status" (UNGA Doc. A/RES/2625(XXV), 1970). That said, the realization of this right should not result in the impairment of the territorial integrity of sovereign and recognised states. Furthermore, in an important ruling the Supreme Court of Canada (1998) in the case on the Secession of Quebec, ruled that both the ICCPR and the ICESCR "define the ambit of the right to self-determination in terms that are normally attainable within the framework of an existing state" (Para.130). The court further stated that "recognized sources of international law establish that the right to self-determination of a people is normally fulfilled through internal self-determination[11] — a people's pursuit of its political, economic, social and cultural development within the framework of an existing state. A right to external self-determination … arises in only the most extreme of cases" (Para.126). On a European level the Helsinki Final Act stipulates that "people always have the right, in full freedom, to determine, when and as they wish, their internal and external political status" (OSCE, 1975, Part VIII). Based on the aforesaid arguments, a general consensus has formed; namely that, beyond decolonization, self-determination should be limited to internal self-determination (Riegl, 2014. p.22).

Moreover, for a polity to be considered a state under international law it has to meet certain conditions. The 1933 Montevideo Convention specified four conditions needed for a state to gain a legal personality under international law. For this a state must have "a) a permanent population; b) a defined territory; c) a government; and d) the capacity to enter into relations with other states" (Art.1). While this Convention was initially binding only upon its parties in the Americas, the conditions soon spread, became accepted by other states, and developed into Customary International Law. In addition to the four necessary conditions, The Montevideo Convention (Art.6) also emphasized one of the most politicized and controversial aspects of statehood: recognition. In this view, only the recognition of a state as

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[11] Internal self-determination can grant a people with ethno-linguistic and cultural characteristics that are different from the demographic majority of the state they reside in, to enjoy a "degree of self-government, without falling into counterproductive quarrels over statehood, territory, boundaries, and citizenship" (Oeter, 2012, Para. 29).

independent and sovereign by other states results in it acquiring an international legal personality under international law. As a consequence any state without such external recognition will find it difficult to effectively engage in the international system. Recognized states have also used the withholding/granting of state recognition as a geopolitical tool in the pursuit of their foreign policy interests (Riegl, 2014, p.20). Based on the above, it is clear that beyond the context of decolonization, polities which choose to become independent for political, historical, cultural, ethno-linguistic, and economic reasons are not able to achieve *de jure* independence even if they meet the formal conditions for statehood.

However, regardless of a lack of external sovereignty, unrecognized states can still achieve *de facto* independence/statehood. *De facto* statehood refers to "the emergence of a political-geographic entity capable of questioning the authority of a central government" and able to exercise (some level of) control over the claimed territory and the population that previously fell under the jurisdiction of the recognized state (Riegl, 2014. p.17). It follows that a *de facto* state can be defined as a polity that seeks to gain international recognition as a full-fledged sovereign state, but is unable to do so, even though it meets the Montevideo Convention's conditions of statehood, and has effective control over the population and the territory to which it lays claim (Riegl, 2014, p.19). Simply put, unrecognized states are polities that have (some level of) internal sovereignty, but lack external sovereignty[12] (Kolstø, 2006, p.724). This lack of recognition also means that the unrecognized states are "perceived as illegitimate in the eyes of international community" (Riegl, 2014, p.21), and as a result their economic and political prosperity becomes critically affected. Thus, in order to sustain themselves, they increasingly have to rely on their own resources (e.g. Somaliland) or that of a patron state (e.g. Abkhazia, South Ossetia) (Riegl, 2014, p.21).

Conventionally, it has come to be accepted that all UN member states (and the Vatican) fall into the category of recognized states. This is despite the fact that there are several UN members that are not recognized by several other UN member states (i.e. Armenia, People's Republic of China, Cyprus, Israel, North Korea, and South Korea). That said, for the purpose of simplicity, this thesis, too, will rely on UN membership as the deciding criteria in determining whether a "state" is recognized or unrecognized.

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[12] A state that has external sovereignty is subject to no other authority, and is thus independent of and *de jure* equal to all other states. In contrast, internal sovereignty refers to the sovereign (e.g. Monarch, Parliament) having final and supreme legitimate political authority to exercise control over the territory.

To add to the confusion, unrecognized states are sometimes wrongly categorized as failing/failed states. "Failed states" are commonly defined as anarchical entities that lack internal sovereignty and effective governance; the best example being Somalia (Caspersen, 2012, p.7). As a result they produce "a dangerous hole in the international system of sovereign states which then fills with variations of disorder" (Caspersen, 2012, p.7). Unrecognized states are in fact often born out of state collapse and the lack of central government ability to exercise control over a secessionist territory (Riegl, 2014, p.25). That said, they are able to achieve a degree of statehood and order, without which they could not be categorized as *de facto* states. The two are therefore opposite as final differentiation is that while failed states enjoy external sovereignty with limited internal sovereignty, unrecognized states lack external sovereignty despite having a level of internal sovereignty when compared to failed states (Caspersen, 2012, p.8).

Over the years, various other terms have been used to refer to unrecognized entities/states, including *de facto* states, self-proclaimed states, pseudo-states, outcast countries, pariah states, *de facto* regimes, para-states, almost-states, proto-states, nascent states, separatist states, self-proclaimed states, *de facto* quasi-states and quasi-states. Still, Riegl (2014, p.19) is cautious of lumping all those terms together as they can have subtle differences, even though they all describe entities that lack international recognition. It is noteworthy that there can also be entities which neither strive for international recognition nor wish to secede from their parent state[13]; such an entity may be referred to as an insurgent state, black spot, anti-state and state-within state.

In order to avoid terminological confusion, this paper will limit itself to the terms "unrecognized state" and "*de facto* state", which will be defined as a polity that meets the following conditions (Kolstø, 2006 , pp.725-726, Caspersen, 2012, p.11; Riegl, 2014):

   i)   has achieved *de facto* independence through effective self-government and control over a (significant) part of claimed territory;
   ii) aspires to gain full-fledged sovereign-state status;
   iii) has a leadership which seeks to build state structures to demonstrate legitimacy;
   iv) has gained no or only limited international recognition;

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[13] Parent state refers to the state from which the unrecognized state is attempting to achieve independence.

v)   has continuously existed for a period of time[14].

Based on the above definition at present the polities that can be considered to be *de facto* states are Abkhazia, Kosovo, Nagorno-Karabakh, Northern Cyprus, Palestine, Somaliland, South Ossetia, Taiwan, and Transnistria[15].

2.4 Citizenship in unrecognized states

The recognition of citizenship is directly linked to the recognition of state sovereignty (Grossman, 2001, p.853), because only a sovereign state can confer citizenship to an individual. Under this proffered definition, the paradox that arises is that the citizenship conferred by an unrecognized state is not recognized under Customary International Law and amongst states not recognizing the *de facto* state. As a result such individuals are often labeled as stateless persons for visa and refugee purposes (Grossman, 2001, p.874), all the while being considered citizens under the domestic law of the *de facto* states.

Furthermore, citizens of unrecognized states may be unwillingly subjected by the parent state and the international community to the citizenship laws of the parent state (Grossman, 2001, p.870). A recent example is the case of a Taiwanese passport holder being classified as *Chinese* on a residence permit in Iceland. Following a complaint her citizenship was changed from Chinese to stateless, because the Icelandic government does not recognise Taiwan as a sovereign state (Gerber, 2016). Similarly, in 2011 the then President of Cyprus claimed that

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[14] Both Kolstø and Casperson give some thresholds for the five conditions. For example, both authors state that the polities should have existed for at least two years and have control of most or at least two-thirds of the claimed territory. However, Riegel opposes such a strict criterion, and considers a "precise delineation of the time period of *de facto* independent existence as a superfluous definitional characteristic" (2014, p.19). He also states that to "precisely define the condition of effective control over the territory … is also [a] superfluous definitional criterion". I would side with Riegel's argument and claim that thresholds for duration and degree of territorial control should be considered on a case-by-case basis.

[15] Based on the five conditions, one may question as to why Donetsk People's Republic and Luhansk People's Republic are not included on the list. There are three reasons. Firstly, it is still too early in time to tell if the two entities meet the conditions to be recognized as a *de facto* state. Secondly, the shifting territorial boundaries due to the on-going conflict make it difficult to measure if the Republics have effective control over their claimed territory. Lastly, it is still not clear what the ultimate goal of the territories is. Based on the Minsk II Agreement they are expected to remain within Ukraine as provinces with substantive autonomy. On the other hand, on some occasions officials have declared that they wish to become independent states, whereas on other occasions the two territories have attempted to create a confederate Donetsk-Luhansk government. Thus because of the current and future uncertain nature of the two polities, it is still too early to consider them as *de facto* states. Likewise, one may wonder why the Sahrawi Republic (Western Sahara) has not been included on this list. As argued by Caspersen (2012, p.8), the reason why the Sahrawi Republic cannot be considered a *de facto* state is because it does not meet the threshold of territorial control (less than 30% of claimed territory is controlled by the Sahrawi Republic). As a result it has also been excluded from the list.

all Turkish Cypriots are also its citizens and have equal rights (Famagusta Gazette, 2011). This brings us to the second paradox, where citizens of unrecognised states, rather than being considered as stateless, are considered to continue to hold the citizenship of their parent state, even if they refuse to accept the authority of the parent state (Littlefield, 2009, p.1471).

However, the notion that only recognized sovereign states can confer citizenship and passports has been gradually changing, with the West Bank (i.e. Palestine) and Kosovar cases showing that citizenship can be "divorced from sovereignty and recognition" (Grossman, 2001, p.860). Furthermore, according to Grossman (2001, p.861), the acceptance of a passport as a valid travel document does not need to be dependent on the recognition of the sovereignty of the polity that issues them. The clearest example is Taiwan, whose passport is accepted as a travel document in over 180 UN member states, all the while being diplomatically recognized as a sovereign state by only 21 recognized states. Another more recent example is Russia's recognition of the passports of the Luhansk People's Republic's and the Donetsk People's Republic's as valid travel documents. Russia stated that the recognition of the passports was done on humanitarian grounds and is devoid of any formal recognition of the sovereignty of the two regions (RT, 2017). That said, a passport is still a symbol of sovereignty and one of the most common documents that can be used to prove one's citizenship. Since recognizing it as a valid travel documents increases the legitimacy of the issuing entity, unrecognized states strive to increase the document's level of acceptance around the world.

Having thus discussed what is meant by citizenship, unrecognized state, as well as the relationship between the two concepts, the following chapter will discuss relevant literature on dual citizenship in recognized and unrecognized states and introduce hypotheses for as to why unrecognized states adopt favorable, but diverging, dual citizenship policies.

Chapter 3 – Literature Review and Hypotheses

This chapter will discuss the reasons behind the growing acceptance of dual citizenship across the world. The first section will look at recognized states and describe the factors behind the increase in acceptance of dual citizenship; namely migration, notions of national identity and liberal-democratic aspirations. Based on these factors, hypotheses will be formulated in order to examine whether/how they contribute to the divergence in dual citizenship policies of our two cases; Abkhazia and Transnistria. The second section will discuss factors that are particular to the dual citizenship policies of unrecognised states; namely utilitarian concerns and the influence of the patron state. These form the basis of a further two hypotheses which will also be tested against the cases of Abkhazia's and Transnistria's citizenship policies.

3.1 The increasing acceptance of dual citizenship

Since the 1990s over a two-third of UN member states have come to accept dual citizenship, albeit some with restrictions (Sejersen, 2008; Blatter et al., 2009). According to the UN, 104 members place no restrictions on dual citizenship, while a further 37 allow it in some form (UN DESA, 2013). This change has also been reflected in the Second Protocol amending the Convention on the Reduction of Cases of Multiple Nationality and Military Obligations in Cases of Multiple Nationality (Council of Europe ETS 149, 1993) and the European Convention on Nationality (Council of Europe ETS 166, 1997, Chapter V).

One often argued reason behind this shift in policies has been the increasing level of cross-border immigration and emigration (Howard, 2005; Glazer, 2010; Blatter, 2011; Wallbott, 2014)[16]. Immigrants often pressure their host countries to accept dual citizenship, because they wish to retain citizenship of their country of origin while gaining political rights in their country of residence (Dahlin & Hironaka, 2008, p.55). Receiving nations often view dual citizenship as a way to better integrate immigrants (e.g. Turkish immigrants in Germany), who would otherwise not engage in the polity at all (Howard, 2006, p.445; Bloemraad et al., 2008, p.168).

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[16] Despite the increased acceptance of dual citizenship, it is important to note that under Customary International Law and Treaty Law an individual has a right to not be stateless (i.e. have a citizenship), but there is no norm that acknowledges the right of individuals to have multiple citizenships.

Similarly, migrant-sending countries may also promote dual citizenship in order to maintain ties with their nationals. One claimed benefit is that by adopting favorable dual citizenship policies, the sending state improves its economy through the remittances and investments of their emigrants (Blatter, 2001, p.782). Martin (2003, p.7) and Pogonyi (2011, p.693) also highlight how states can use their expatriates to improve relations with the host country, or in extreme cases, can use them as a fifth column to influence the domestic politics of the host country. They may additionally push for dual citizenship it in order to better protect the rights of their migrants (Martin, 2003, p.8; Blatter, 2011, p.783).

A policy that is closely linked with this is the provision of citizenship to members of a diaspora[17], as a state may want its (ethnic) diaspora to maintain/reclaim ties with their homeland. Germany, Portugal, and Spain are just some of countries that generously hand out citizenship to third-country nationals (Pogonyi, 2011, p.699). Another benefit is that by adopting favorable diaspora policies the state, similar to migrant-sending states, can gain financial and economic benefits (Riegl, 2014, p.30). Additionally, Martin's and Pogonyi's arguments for why migrant-sending states encourage dual citizenship, may also be applicable to diaspora communities.

As the above mentioned research only deals with the impact of migration on dual citizenship policies in recognized countries, it will be insightful to investigate if migration has a (similar) effect on the citizenship policies of unrecognized states in the post-Soviet space.

Hypothesis 1 – A large immigrant population, a large emigrant population, or a large diaspora affects the likelihood of an unrecognized state adopting favorable dual citizenship policies.

Dahlin & Hironaka (2008) in their quantitative cross-national study (N=102) claim that immigration is not a significant predictor of a state's position on dual citizenship. Instead

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[17] It is important to note that in this thesis the terms "emigrant" and "diaspora" have two different meanings. "Diaspora" refers to a group of people who have migrated *en masse* outside their *nation*/homeland at some point in (distant) history. The term "emigrant" refers to an individual who has left their country in the recent past. Certainly, when emigrants live in a country for several generations and form a community with other emigrants from their home country they acquire traits of a diaspora. Thus, the main difference between a diaspora and an emigrant community is based on when the out-migration occurred. Secondly, for out-migrants to be defined as a "diaspora" they must have and maintain a sense of group identity that ties them to their *nation*/homeland.

they argue that the type of national identity (i.e. assimilative/differentialist, ex-colonial[18], postnational) has a bigger impact on the acceptance of dual citizenship. Assimilative laws confer citizenship based on a *jus soli* principle, while differentialist laws confer citizenship based on the *jus sanguinis* principle. The authors find that states with assimilative citizenship policies are more likely to allow for dual citizenship, because such states have a more inclusive national identity (p.66). The increasing number of countries that accept dual citizenship can also be an outcome of citizenship policies being increasingly based on the concept of "universal personhood" rather than exclusive ethnic or *national* membership (Yasemin as cited in Wallbott, 2014, p.10).

These findings raise the question whether a state grants citizenship based on ethnic or civic notions of national identity (Bloemraad et al., 2008, pp.158-159). Ethnic nationalism is build around the notion of belonging to a particular *nation* rooted in common descent, whereas civic nationalism ties belonging to equal rights and a universalist, voluntary political membership (Bloemraad et al., 2008, p.158). In other words, in the former case, only individuals belonging to a certain ethno-national group are granted citizenship (*jus sanguinis* principle), while in the latter, citizenship is granted regardless of ethnic/blood ties to the granting state (e.g. USA). It is therefore interesting to explore if the same association exists within unrecognized states.

Hypothesis 2 – Unrecognized states that have assimilative/civic identities are more likely to adopt universalist dual citizenship policies.

The rules of citizenship have until recently been solely dictated by states. However, the process of globalization and international migration has aided in the de-territorialization of citizenship by challenging the state-centric and state-controlled nature of rights associated with citizenship (Bloemraad et al., 2008. p.166). In addition, the internationalization of individual rights has further challenged the "singularity of rights based on membership in a nation state" (Blatter, 2011, p.771). This de-territorialization and the spread of the individual

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[18] There is a strong correlation between a state being a former colony and it allowing for dual citizenship. According to Dahlin & Hironaka there could be two reasons for this. Firstly, these states may have an incentive to maintain dual citizenship with their former (European) colonial power to obtain political, economic, and travel benefits. Secondly, many former French and British colonies recognized dual citizenship because much of their legislation was based on that of their colonial masters, which also accepts dual citizenship (2008, p.59). However, as this reasoning does not directly apply to unrecognized states it will not be discussed in further detail.

rights globally is also associated with the post-national citizenship identity, which "implies that individuals should be able to choose their state, rather than passively accepting membership in the state that chose them" (Dahlin & Hironaka, 2008, p.60). For this reason, greater state acceptance of dual citizenship has been seen as a step towards the development of post-national citizenship (Pogonyi, 2011, p.686).

Lastly, the greater acceptance of individual rights is also commonly linked to liberal democracy, as liberal democracies better promote and protect individual rights than non-democracies. According to Blatter (2011, pp.773-777) a liberal democracy "builds on a strong connection between legal rights of citizens and political rights", and dual citizenship is one way of expanding the rights of individuals. Wallbott (2004, p.32), in his Qualitative Comparative Analysis on Western Europe, finds that the countries with left-wing (liberal) governments have a causal effect on the adoption of liberal dual citizenship policies. This is interesting because liberal-democratic development is particularly important for unrecognized states, as they hope to gain international legitimacy, and thereby international recognition (Clogg, 2008, p.311; Caspersen, 2012, p.69). As already mentioned in *Section 2.3 (see p.16)*, liberal-democratic aspirations are also one of the five conditions that a polity needs to meet in order to be considered a *de facto* state (Caspersen, 2012, p.11).

Thus, it is worth probing whether an unrecognized state's aspiration of becoming a liberal-democracy[19], which promotes individual rights, including the freedom to freely choose one's citizenship(s), has an affect on its dual citizenship policy[20].

Hypothesis 3 – Unrecognized states that have liberal-democratic aspirations are more likely to adopt unrestricted dual citizenship policies.

Having discussed the motives behind why recognized states adopt dual citizenship policies

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[19] When formulating this hypothesis it is assumed that by adopting liberal dual citizenship policies unrecognized states can show their level of democracy.
[20] It must be noted that there is one caveat to this argument. Pogonyi (2011) argues that the acceptance of dual citizenship has not been solely as a result of the normative (rights based) argument. Instead, as further discussed in *Section 3.2*, some states have used dual citizenship as a soft power tool to exert pressure/dominance beyond their borders (Bloemraad et al., 2008. p.167). For this reason, dual citizenship remains a politically salient and controversial topic in many states (Blatter et al., 2009, p.3). Thus, despite the clear trend towards greater acceptance of dual citizenship there is a lack of "global agreement on citizenship legislation" (Sejersen, 2008, p.538).

and derived corresponding hypotheses for *de facto* states, the next section will discuss the reasons that are particular to unrecognized states.

3.2 Dual citizenship in unrecognized states

Similar to many recognized states, unrecognized states have also adopted favourable dual citizenship policies[21]. Despite this, their policies are not uniform; states like Transnistria and Kosovo place no restrictions on their citizens' choice of the second citizenship, while Abkhazia and South Ossetia allow dual citizenship only with a single nation (i.e. Russia). Having the citizenship of a recognized state is appealing to individuals as it allows them to receive numerous benefits, including easy international travel, diplomatic protection, socio-economic benefits (e.g. pensions and access to job-markets), as well as to maintain ties with their kin across the border (Artman, 2013, p.690-691). Thus it is insightful to confirm whether utility is one of reasons for unrecognized states to allow dual citizenship.

Hypothesis 4 – Unrecognized states allow dual citizenship out for utilitarian reasons in order to improve the welfare of the states and its citizens.

Another powerful factor influencing citizenship policies has been the influence of patron states. Since their initial attempts at secession, Abkhazia, South Ossetia, and Transnistria, have looked towards Russia for support for their international recognition as well as for political, economic, social assistance[22], and Nagorno-Karabakh has appealed to Armenia for similar reasons. Russia, in turn, has continued the Soviet *divide and rule* policy for its geopolitical gains, and supported these polities to varying degrees (Kolstø, 2006, p.733; Littlefield, 2009, p.1464). Russia has effectively used these conflicts to its advantage and maintained control over its sphere of influence.

Until 2008 Russia subscribed to a policy of *defending without recognizing* (Kobrinskaya, 2008, p.2), but this changed in 2008 when Russia recognized Abkhazia and South Ossetia as sovereign states. Following the recognition, the Russian government has invested heavily to

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[21] There is an additional paradox with regards to dual citizenship of unrecognized states. Since the citizenship granted by the unrecognized state may not be internationally recognized, individuals from such states processing dual citizenship simultaneously fall into two opposing categories; (i) dual citizens as per laws of the countries that recognize the *de facto* state, and (ii) citizens of only the recognized state whose citizenship they possess.
[22] Ironically, however, Russia was quick to suppress any movements for independence (i.e. Chechnya) that occurred within its borders.

ensure the two *de facto* states' (political) survival. However, Russia has maintained the *defending without recognizing* policy towards Transnistria, by keeping a strong military/peacekeeping and economic support for the region. Nagorno-Karabakh, although also not recognized by its patron state, has been able to survive due to the economic and military support from Armenia (Kolstø, 2006, p.733). This makes it clear, that patron state support is a fundamental reason for the continued existence of these *de facto* states, as a consequence of which they have been able to establish symbols of statehood, including the formation of citizenship policies and the issuance of passports.

One characteristic feature of patron state support has been the easy access to the citizenship of the patron state via the policy of passportization, which in turn is likely to have impacted the dual citizenship policies of the unrecognized states. The policy of passportization is also at work when kin-states (e.g. Hungary and Romania) grant dual citizenship to trans-border minorities. The most cited example of a country that uses passportization as a soft power tool is Russia[23], where passportization refers to the policy of conferring citizenship en masse to ex-USSR citizens living in the "near abroad"[24] (European Court of Human Rights, 2009, p.18).

The first clear instance of Russia adopting the policy of passportization was in 2002 in Abkhazia, following which it implemented similar policies in South Ossetia, and Crimea (Khashig, 2002; Artman, 2014). The international community and the states where passportization has taken place (i.e. Georgia, Ukraine) have criticized this policy, as they perceive it as a threat to state sovereignty (Pogonyi, 2011, p.696). Notwithstanding such criticism, Russia has continued with this process for nearly two decades. Russia justifies its passportization policy based on the argument that it has the duty to protect individual rights and ensure that all people (particularly ethnic Russians) living in the post-Soviet space have access to a citizenship which guarantees them basic rights (Littlefield, 2009, p.1473). However, as has been suggested, Russia is keen on protecting its geopolitical interests in the near abroad and as a strategy has resorted to the policy of passportization to maintain regional hegemonic control (Littlefield, 2009, p.1478; Mühlfried, 2010, p.13).

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[23] Similarly, citizens of Nagorno-Karabakh have easy access to Armenian passports and Turkish Cypriots have access to passports of Turkey.
[24] The "near abroad" refers to the areas of the former Soviet Union over which Russia seeks to maintain control.

Still, the legality of Russia's passportization policy remains disputed[25]. Russia, while originally claiming to provide citizenship on purely humanitarian grounds, later used the presence of Russian citizens justify its interventions in the *near abroad* (Littlefield, 2009, p.1473; Mühlfried, 2010). This shows that there is a lack of clarity about the limits of granting citizenship to persons permanently residing outside the citizenship-issuing country and about the state's responsibilities toward these new citizens. Russia's actions show that there exists a grey area in the notion of what granting of citizenship and the need for the protection of citizens abroad entails. Furthermore, through this process Russia was able "to create *Russian spaces* within the internationally recognized borders" (Artman, 2013, p.109), which it eventually used to justify its interventions in Abkhazia, South Ossetia, and Crimea[26].

Out of the four unrecognized states, Russian passportization policies have been most prominent in Abkhazia and South Ossetia, where over 80% and 90% of the population respectively possess Russian citizenship (Littlefield, 2009, p.1473; South Ossetia Today, 2016; Malaev, 2017). Notably, in Transnistria the figure is just over 40%[27]. Currently, no figures are available for Nagorno-Karabakh.

Russia has also economically supported these regions in varying degrees, with the most extreme cases being South Ossetia, where 92% (8.9 billion RUB) of the state revenue was subsidized by Moscow (South Ossetian State Budget for 2016, 2015), and in Abkhazia, where that value was at 67% or 7.7 billion RUB (Abkhaz Republican Budget for 2016, 2015)[28]. For Transnistria, Russia has annually provided humanitarian assistance (e.g.

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[25] For further analysis of the legality of the passportization process see
http://www.loc.gov/law/help/russian-georgia-war.php

[26] Russia legitimised its interventions under Article 61 of the Constitution of the Russian Federation (1993), which states that Russia must protect *its citizens* living beyond its borders (Littlefield, 2009, p.1462, p.1470).

[27] Out of 500,000 citizens approximately 300,000 Transnistrians are Moldovan passports holders, while 200,000 and 70,000 Transnistrians hold Russian and Ukrainian passports respectively, with some citizens holding more than two citizenships (Dubrovin, 2013; Sercrieru, 2015; Ryumin, 2017; Luzhansky & Lysenko, 2017).

[28] One may argue that excessive patron state support may undermine the *de facto* independence (i.e. effective self-government and control over the claimed territory) by the unrecognized state. However, the level of effective self-government and control over the territory must be considered in relation to the parent state, and not the patron state. Such criticism is therefore invalid.
The above argument can however be linked to the prerequisites needed for an unrecognized state to achieve sovereignty. In a study on Taiwan, Russian experts Kosolapov, Kunadze, and Larin (as cited in Kobrinskaya, 2008, p.3) proposed several prerequisites. According to them in order to achieve sovereignty and justify their viability an unrecognised state must:
    i)   Be incompatible with its parent state due to historical, religious, or ethnic differences;
    ii)   Not pose a potential security risk to the parent state;
    iii) Have socio-economic viability;

pensions, disability allowances) and in 2015 this accounted for approximately 560 million RUB (PMR Ministry of Finance, n.d.). Additionally, Abkhazia and South Ossetia maintain strong military ties with Russia. Interestingly, the two polities that have received the greatest support from their patron state, Abkhazia and South Ossetia, allow dual citizenship only with the Russian Federation.

One must thus wonder if there is indeed a relationship between the level of support provided by the patron state and the level of restrictiveness with regards to the dual citizenship policy of the unrecognized state. As a result this thesis will test a final hypothesis.

Hypothesis 5 – A high level of support from the patron state (passportization and socio-economic benefits) influences the unrecognized state to adopt more restrictive dual citizenship policies.

Having thus discussed the relevant dual citizenship literature, the following chapter will outline the research design and the methodology that will be used to test the five hypotheses developed in *Sections 3.1* and *3.2*.

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iv) Have a border with a third country or an outlet to the sea;
v) Have the consent of a bulk of the permanent population living on its territory.
Based on these prerequisites the attainment of point three can be questioned, since without Russian assistance the socio-economic viability of South Ossetia and Abkhazia is not guaranteed. In this sense, the excessive Russian assistance, while ensuring Abkhazia's and Transnistria's survival under a parent state/international blockade, does indeed undermine their sovereignty.

Chapter 4 – Methodology

Chapter 3 has shown that there exists a general trend, for varying reasons, for states to increasingly accept dual citizenship. This was followed by a discussion on citizenship in unrecognised states. Out of the nine identified unrecognised states, seven polities have varying but relatively unrestricted *de jure* (and *de facto*) positions on dual citizenship, whereas two polities have highly restrictive policies. In order to explore these differences and test the hypotheses outlined in Chapter 3, a qualitative comparative case study between the two post-Soviet unrecognized states of Abkhazia and Transnistria will be conducted in Chapter 5.

Having looked into the contributing factors behind the *de jure* acceptance of dual citizenship, the next step is to further explore the reasons for the divergent citizenship policies among unrecognized states by looking at the practical aspects of the formation and implementation of the laws as well their origins. To accomplish this, this work will make use of the Most Similar Systems Design (MSSD) approach. MSSD is a research method used in comparative politics to compare very similar case having one attribute that is different, and then identify the factors that cause variation in the attribute being studied. By using this method it is possible to control for and disregard common factors, and the factors that have different values across the cases can be used to explain the variation in the dependent variable (Meckstroth, 1975, p.133). Since in our study the dependent variable (the acceptance of dual citizenship) has a variation (and occurs in a continuum) the MSSD is appropriate. As already alluded in Chapter 2, the dual citizenship continuum is based on several components of dual citizenship, the more of which are fulfilled by an unrecognized state, the more its dual citizenship policy is considered to be liberal. These components are:

   i)   Dual citizenship allowed only with kin/patron state vs. dual citizenship with any country;
   ii) Dual citizenship is allowed with the parent state;[29]
   iii) Dual citizenship is granted to the diaspora;

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[29] While allowing dual citizenship with the parent state may go against the political principles of self-determination, from an individual rights perspective allowing a citizen to have citizenship even with an enemy state (i.e. parent state) still increases an individual's ability to enjoy benefits and privileges in more than one polity.

iv)   Dual citizenship is allowed with naturalization (for migrants).

An MSSD research is further appropriate for the analysis of post-Soviet cases as there are a significant number of similarities between them. Namely, they

i)   emerged during the collapse of the Soviet Union;

ii)   entered cease-fire agreements with their parent state during the period the 1992-1994, with limited progress being made regarding the future status of the territories;

iii) have had significant assistance from a single patron state (Russia/Armenia);

iv)   have a dual citizenship policy.

Based on the above, it would be possible to compare Abkhazia, South Ossetia, Transnistria, and Nagorno-Karabakh using the MSSD method. However, Nagorno-Karabakh would be an outlier as it has received substantial support from Armenia, while for the other three polities the only patron-state is Russia. Therefore the case of Nagorno-Karabakh will not be used in this study[30]. Abkhazia and Transnistria have the most divergent dual citizenship policies, with the former allowing dual citizenship only with Russia whereas the latter places no restrictions on its citizens. Also, the former has a citizenship policy on diaspora, while the latter lacks one. The South Ossetian Nationality Law (2006, Art.6) states that its citizens "without renouncing the citizenship of the Republic of South Ossetia, have the right to acquire the citizenship of the Russian Federation". A literal reading may seem that South Ossetia does not explicitly prohibit South Ossetians from acquiring dual citizenship with a country other than Russia, however, in practice this Article is interpreted as South Ossetians being allowed to have dual citizenship only with Russia (Giotes, 2013). Furthermore, South Ossetia like Transnistria lacks any citizenship policy on diaspora. Thus, South Ossetia would fall somewhere in between Abkhazia and Transnistria on the continuum of dual citizenship policies (*see Appendix, p.59*). As a result, to conduct an ideal MSSD research this thesis will focus on the two territories that are heavily influenced by the Russian Federation while simultaneously having the most different dual citizenship policies. Only when deemed necessary the cases of South Ossetia will be used to strengthen the analysis.

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[30] Another reason for not analyzing Nagorno-Karabakh is that the Law on Citizenship of Nagorno-Karabakh (1995) lacks specificity on the government's position on dual citizenship. Therefore not a lot of information can be extracted from it. It says is that dual citizenship is allowed, but provides no further details of the conditions (Art.4).

Under Abkhazian Nationality Law (2005), Abkhazian citizens can only hold dual citizenship with the Russian Federation (in addition there are provisions for ethnic Abkhaz diaspora to gain Abkhazian citizenship without losing their present citizenship). Under Transnistrian Nationality Law (2002), multiple citizenships are allowed without restriction, including with the parent state. The two polities have very opposing citizenship policies despite similar historic and political circumstances of their emergence (i.e. part of a republic of the USSR, declared independence upon the dissolution of the USSR, strong Russian influence in the territory, non-recognition by parent state/international community, multi-ethnic, different ethnic composition than the parent state). Because of this a MSSD qualitative comparative research is the most appropriate. Furthermore, as will be discussed in Chapter 6, since these cases fall on opposite ends of **Hypotheses 1**, **2**, and **5**, it is be possible to explore how these differences impact the dual citizenship policies of the two unrecognized states.

For this comparative analysis the primary sources used are official state documents (e.g. Laws, reports, press-releases). Whenever deemed necessary mass-media outputs will be used as a secondary source. In order to answer the research question of what factors contribute to the adoption of divergent dual citizenship policies by unrecognized states in the post-Soviet space, this thesis will combine qualitative content analysis of official documents with process tracing. Content analysis makes it possible be possible to analyze the various components of the old and new dual citizenship policies. This will then be put into the historical and political context within each unrecognized state, in order to discover how it contributed to the development of the citizenship policy[31].

To get greater insight into the factors that affect dual citizenship policies I conducted several in-depth, semi-structured interviews with government officials, academics, and lawyers (*see Appendix, pp.60-61*). I would like to emphasize that I made efforts to interview with as many individuals as possible, and was in the end able to conduct four interviews in Abkhazia and three interviews in Transnistria. Additionally, any follow up questions were clarified via email correspondents. The interviews were conducted in Sukhum, Abkhazia (24th-25th April) and in Tiraspol, Transnistria (12th-13th April).

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[31] Krasniqi (2010) uses a similar method to analyse Kosovo's citizenship policy by looking at the historical and political factors that have influenced the current citizenship laws.

For a clear analysis, Chapter 5 will be separated based on the various underlying themes and Hypotheses identified in Chapters 2 and 3 (i.e. utilitarian reasons, liberal-democratic aspirations, migration/diaspora, citizenship identity, and patron state influence).

Chapter 5 – Comparative Analysis

This chapter, being the main component of this thesis, will be divided into three main parts. The first part of the chapter will provide the background of the two *de facto* states, Abkhazia and Transnistria, to familiarize the reader with the historical and political conditions that would influence their dual citizenship policies. The subsequent section will list the dual citizenship policies presented in the current and previous citizenship laws of Abkhazia and Transnistria. Following this, the chapter will go on to test the hypotheses formulated in Chapter 3.

5.1 Historical Background of Abkhazia

According to the Abkhaz narrative, the country traces its origin back to the Kingdom of Abkhazia (8th Century). Between the 10th and the 13th Century the Abkhaz people were in a union with Georgia, and afterward remained an independent principality until 1810, when Abkhazia was absorbed into the Russian Empire. However, it remained politically autonomous until 1864 when Abkhaz uprisings resulted in the Tzar deporting them en masse to the Ottoman Empire (Jafarova, 2015, p.25).

Abkhazia remained under Russian influence during the Soviet period, forming a confederation with Georgia from 1921-1931, and later being downgraded to the status of an Autonomous Soviet Socialist Republic (ASSR) within the Georgian Soviet Socialist Republic (SSR) (Littlefield, 2009, p.1466; Jafarova, 2015, pp.25-26; *see Appendix, Figures 1-2, p.62*). In the 1897 census the Abkhaz[32] and Georgians respectively made up 55% and 24% of the population of Abkhazia. By 1959 the percentage of Abkhaz had decreased to 15% (despite the population itself increasing) while Georgians now made up 39% of the population, and by 1989 this number had climbed to 46% (Naseleniye Abkhazii, n.d.). The Georgification along with the limiting of rights and political power in their own homeland, led the Abkhaz to fear cultural extinction (Coppieters, 1999, pp.16-17). This resulted in their desire to protect their *nation*, and became a root cause for the escalation of the conflict between Abkhazia and Georgia, which eventually led to war in 1992-1993. Another root cause and trigger for the

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[32] For the purposes of this study, the term "Abkhaz" will refer to the ethno-linguistic group who trace their origins to modern day Abkhazia, and the term "Abkhazian" will refer to citizens of Abkhazia regardless of ethnic background. In all other instances, the term "Abkhazian" will be used over "Abkhaz".

war was the dissolution of the Soviet Union, which created sudden power vacuums in several former republics where no (legitimate) authority was able to exercise control over the entirety of their territory (Coppieters, 1999, p.19). As a consequence several entities (i.e. Abkhazia, Chechnya, Gagauzia, Nagorno-Karabakh, South Ossetia, Transnistria) declared independence from their parent state, leading to military conflicts.

On 25th August 1990 the Supreme Council of the Abkhaz ASSR declared sovereignty as the Abkhaz SSR (Declaration on the State Sovereignty of the Abkhaz SSR, 1990). However, this was not accepted by Georgia, and tensions rose until war broke out (August 1992 – September 1993)[33], which resulted in Georgia, the parent state, losing *de facto* control to the Abkhazian government. Following the end of the war, under Russian and UN mediation, several cease-fire agreements were signed in 1993, 1994 and 1997, and saw the deployment of a Commonwealth of Independent States (CIS) peacekeeping force, comprised primarily of Russian forces[34]. Henceforth, Georgia has maintained that Abkhazia is an integral part of its territory and has taken steps to limit the participation of the *de facto* state in the global system, because of which cooperation/negotiations between the two parties have been limited (e.g. Geneva Discussions). Furthermore, in 1966 the CIS put economic and political sanctions in place, adding to the isolation of Abkhazia. It was only when Russia ceased to observe the CIS sanctions in 1999 that the Abkhaz economy began to improve (Frear, 2014, p. 88). In October 1999, Abkhazia held a referendum, which asked whether the citizens approved the 1994 Constitution. The referendum passed with 97.7% and was interpreted to confirm the desire of Abkhazians to remain independent. Following this the Abkhazian government issued the Act on State Independence (Abkhazian Representation in PMR, n.d.). However, Georgia opposed this and no international recognition was received.

The status quo remained until July 2006, when Georgia began anti-Criminal Operations in the Kodor valley (Jafarova, 2015, p.27), and finally escalated with the onset of the 2008 Russo-Georgian war, when the Russian Federation intervened in the region under the claim of protecting Abkhaz and Russian nationals from Georgia (*see Appendix, Figure 3, p.63*). Following this Abkhazia was able to gain some international recognition, namely by Russia,

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[33] This conflict resulted in at least 2000 deaths, but the conflicting parties disagree about the exact figure. See
http://ucdp.uu.se/#/statebased/839
[34] For list of agreements see
http://peacemaker.un.org/document-search?keys=&field_padate_value[value][date]=&field_pacountry_tid=Georgia&field_paregion_tid[0]=19&field_paconflict_tid[0]=2&field_paconflict_tid[1]=1&&order=field_padate&sort=asc

Nicaragua, Venezuela, Nauru, Tuvalu, and Vanuatu[35]. However, with the exception of Russia, due to the relatively small economies of these far-away countries, the economic benefits for Abkhazia are limited (Frear, 2014, p.86). In other words, even though these recognitions are important for Abkhazia, they are largely symbolic. Of great importance is the Treaty of Friendship, Cooperation and Mutual Assistance that Russia concluded with Abkhazia soon after the intervention. This, along with subsequent agreements[36], shows Abkhazia's reliance on Russia for security and economic support. Russia further signed the Memorandum of Understanding on Cooperation in International Affairs with Abkhazia, which outlined that "Russia would actively seek the recognition of Abkhazia by third parties and the inclusion of Abkhazia in international organizations of which Russia is a member" (Frear, 2014, p. 89). This demonstrates that Russia has taken on the role of a patron state for Abkhazia whose heavy reliance on Russia has resulted in the country becoming vulnerable to Russian pressures, and even to an extent becoming a *de facto* Russian space (this development is even more pronounced in South Ossetia). However, according to Frear (2014, p. 89), this external dependence does not mean that internal sovereignty is absent (*see Footnote 28, p.24*), and since 2008 the economic, political, and social situation has continued to improve steadily despite efforts by Georgia (and its allies) to internationally isolate Abkhazia[37].

5.2 Historical Background of Transnistria

The main part of modern-day Moldova lies between the Prut and Dnestr rivers. From the 14th Century to 1812 this area, together with areas of modern-day Romania, was part of the Principality of Moldavia, which was aligned with the Ottoman Empire. In the 18th Century the Russian Empire began its westward expansion and in 1812, and this area fell under the control of Imperial Russia.

The land that makes up modern-day Transnistria fell within the Russian domain slightly earlier, in 1792, following the sixth Russo-Turkish war. Prior to this, this area was under the control of varying regional powers. Thus it was in 1812 that the two lands were for the first time brought together under single a control and renamed Bessarabia. This situation prevailed until the Russian Revolution, when the area west of the Dnestr river was united with Romania. In order to boost Soviet claims over Bessarabia, Moscow, in 1924, went on to

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[35] In 2013 Vanuatu withdrew its recognition, and the following year Tuvalu also did the same.
[36] For a list of agreements see http://presidentofabkhazia.org/en/doc/mezhdunarodnye-dogovory.php
[37] For further analysis of the situation in Abkhazia see Jafarova (2015) and Francis (2011).

carve out the Moldavian ASSR, which then fell under the administration of the Ukrainian SSR (OSCE, 1994, p.1; *see Appendix, Figure 4, p.64*). In August 1940, the Moldavian SSR was created out of parts of the Moldavian ASSR and parts of Bessarabia that it obtained following the Molotov-Ribbentrop Pact. However, the Nazi invasion in July 1941 "made this arrangement irrelevant", and only when Soviet troops crossed the Dnestr river in 1944 were they able to regain administrative control over the Moldovan SSR (Lynch, 2004, p.32; *see Appendix, Figure 5, p.65*). Thies administrative situation would remain until the late 1980s when the Soviet Union began slowly disintegration.

Even though the Moldovan SSR was united from 1944 onwards, the different historical paths of the territories on either side of the Dnestr river created quite different identities. Beginning in 1944 the right bank was purposefully Sovietized and Russified and was given an identity that highlighted "the uniqueness of Moldova and non-Romanian identity" (Lynch, 2004, p.32; OSCE, 1994, p.1)[38]. On the other hand, the left bank had been under Russian/Soviet influence for a longer period of time, had had a multi-national population made up of Russians, Moldovans, Ukrainians, and small communities of Bulgarians, Poles, and Jews, and has used Russian as its primary language for over a century. This resulted in the people on this side of the river being more easily able to identify themselves with the Soviet identity. It is these differences in ethnic, linguistic, and historical backgrounds that became the catalysts that led to the emergence of the conflict between Transnistria and Moldova[39].

The Soviet disintegration resulted in a "contest over the identity and orientation of the new state", with the Popular Front (a political movement) calling for the Chisinau administration to adopt the Moldovan language, written in the Latin script, as the official language[40] (Lynch, 2004, p.32). They succeeded and in August 1989 the Supreme Council of the Moldavian SSR adopted Moldovan as the official language, and in the following year adopted the Romanian national anthem and tri-color as official state symbols (OSCE, 1994, p.1). As a result of this, restrictive language policies became the first "battleground" between the peoples in Moldova

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[38] To achieve this the USSR highlighted for example the uniqueness of the Moldovan language and changed its script from Latin to Cyrillic.

[39] Lynch (2004, p.33) also argues that there were political and economic reasons behind the divergence of the political trajectories. During Soviet rule, the Moldovan SSR was governed by an elite from Transnistria. The Soviet disintegration caused this elite to lose their hold in Moldova and threatened their control over local (Transnistrian) industries. Thus, to maintain control, the Transnistrian elite chose sever ties from the Moldovan SSR by declaring independence.

[40] The difference in script is the primary difference between Romanian and Moldovan languages.

(Lynch, 2004, p.32). The Popular Front of Moldova also called for Moldova's eventual reunification with Romania and sought to distance itself from Moscow, and demand that led the parliament to adopt the declaration of Sovereignty of the Moldovan SSR in June 1990. These actions caused other minorities to feel threatened and alienated, in particular the highly Sovietized and Russophone left-bank population, and they soon began to hold demonstrations (Lynch, 2004, p.32). Eventually, to counter Chisinau's actions, an ad-hoc assembly (the Second Congress of the Peoples' Deputies of Transnistria), based in Tiraspol, proclaimed the Pridnestrovian Moldavian SSR (independent from Moldovan SSR) on 2nd September 1990 (Supreme Council of the PMR, n.d.). Soviet President Mikhail Gorbachev was quick to dismiss this and called the proclamation null and void, citing a lack of legal grounds[41]. Nonetheless, Transnistrians wished to remain independent from both the Moldavian SSR, and following the Soviet collapse, of independent Moldova. As a result, a year later on 25th August 1991, the Transnistrian authorities declared independence from the Soviet Union[42]. The people's desire to remain independent was also confirmed by referenda held in Transnistria in 1991 and 2006.

However, the Chisinau authorities refused to accept the legitimacy of the Tiraspol government and their declaration, and took (military) steps to take control over areas under Transnistrian control. This resulted in sporadic clashes that soon escalated into a state of war (2nd March 1992 – 21st July 1992)[43]. The conflict ended following Russian intervention and the signing of a ceasefire agreement[44] between the parent state (Moldova) and Russia, and the deployment of Russian, Moldovan, and Transnistrian battalions/peacekeepers in the area (OSCE, 1994, p.3). Additionally, from 1993 the OSCE has maintained an observation mission to monitor the peacekeeping activities in the border zones[45].

In spite of Russia being the security guarantor, the political future of Transnistria has remained unresolved, although some cooperation (primarily in non-political areas) has happened between Chisinau and Tiraspol. Over the years, Transnistrian authorities have

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[41] During the same period (August 1991) the Gagauz declared independence, and in 1994 they accepted a proposal for autonomy within the Republic of Moldova.
[42] Document available at http://mfa-pmr.org/ru/DTp
[43] According to available sources there were less than 600 deaths. See http://ucdp.uu.se/#/statebased/841
[44] Agreement available at http://peacemaker.un.org/sites/peacemaker.un.org/files/MD%20RU_920000_AgreementPrinciplesPpeacefulSettlementDniestrConflict.pdf
[45] For further information see http://www.osce.org/mission-to-moldova

achieved firm control over the left bank and built stable state institutions, which means that Transnistria has become a *de facto* state (*see Appendix, Figure 6, p.66*). Nonetheless, it must be noted that, unlike Abkhazia and South Ossetia, Transnistria is yet to be recognized by a single UN member state, including the Russian Federation. Despite of this, the Transnistrian government continues to get support from Moscow, thus ensuring its long-term survival.

5.3 Formation of Citizenship Law in Abkhazia and Transnistria

The disintegration of the Soviet Union resulted in millions of Soviet citizens becoming citizens of one of the former 15 Republics. In other words, a "new" citizenship associated with each post-Soviet state was created in order to accommodate and provide a legal status to the millions of Soviet citizens. Georgia and Moldova also followed this *new state model* of citizenship. The primary point of this model is that new states, arising from the breakup of larger states and not having previously had an independent citizenship policy, define their initial body of citizens based on territory (Brubaker as cited in Krasniqi, 2010, p.2). This means that all individuals residing on that territory at the time of its breakup became its citizens, and thus made up the bulk of the citizenry of the new country.

Similarly, with the *de facto* separation of Abkhazia and Transnistria from their parent states it became necessary to define who is eligible for citizenship. The formation of the initial Citizenship Laws of Abkhazia (1993) and Transnistria (1992) were thus the result of the *de facto* independent status achieved following the secessionist conflict and aided by the geopolitical changes in the region. I have, however, not been able to find similarly clear triggers behind the adoption of new citizenship laws in Abkhazia and Transnistria a decade later. I can only assume that the amendments are a result of the natural process of political debate and legal development. As the direct triggers for the new laws in 2002 (Transnistria) and 2005 (Abkhazia) are not immediately clear, it is the goal of this analysis to uncover them and to thereby contribute to the wider discussion on citizenship policies.

5.3.1 Dual Citizenship Law of Abkhazia

When discussing the dual citizenship policies of Abkhazia there are two legal documents that must be discussed. They are the 1993 Law on Citizenship and its replacement, the 2005 Law on Citizenship. The following table lists the clauses that refer to dual citizenship, which will

facilitate the subsequent analysis.

Table 1: Comparison of the Laws on Citizenship of Abkhazia

Law on Citizenship of RA (1993) 10th December 1993 Amended in 1995 & 2992	Law on Citizenship of RA (2005)[46] 8th November 2005 Amended in 2013
Article 7	**Article 6**
An Abkhazian citizen may acquire any other citizenship, as established by the current law (**Refer Art.23**).	An Abkhazian citizen, with the exception of those acquiring citizenship under **Art.5§a,** may acquire only the citizenship of the Russian Federation.
N/A	**Article 17**
	An Abkhazian citizen, who possesses another citizenship in contravention to the current law, will forfeit their Abkhazian citizenship.
Article 15	**Article 5§a / Preamble 3**
Abkhaz diaspora may apply for Abkhazian citizenship without the need to fulfill standard naturalization requirements, including the renunciation of their previous citizenship (**Refer Art.16**).	All ethnic Abkhaz (i.e. diaspora) are automatically entitled to Abkhazian citizenship, regardless of where they reside or whether they have any other citizenship, unless such individuals are involved with activities that threaten the sovereignty of Abkhazia. Abkhaz who acquire Abkhazian citizenship under this article are not required to renounce their previous citizenship (**Refer Art.6**).
Article 16	**Article 13**
A naturalized Abkhazian citizen (with the exception of Abkhaz diaspora) must renounce their current citizenship(s).	
Article 23§1	**Article 27§1**
The President of Abkhazia takes the final decision with regards to i) acceptance into the citizenship of RA; ii) approval of dual citizenship for Abkhazian citizens.	The President of Abkhazia[47] takes the final decision with regards to i) acceptance into the citizenship of RA.
Article 7	**Article 6**
Just like many other states, Abkhazia also emphasizes the master nationality rule. Abkhazia (unless agreed by an international agreement) will consider the dual national only as a citizen of Abkhazia.	Abkhazia will consider the dual national only as a citizen of Abkhazia.

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[46] It is worth noting that there are many similarities with this law and South Ossetia's Law on Citizenship (2006, Art.6/Art.13/Art.27). There are also many similarities between the Abkhazian law and the Law on Citizenship of the Russian Federation (2002). The obvious reason is the close relationship between the two countries, which aided in the diffusion of the Russian citizenship law into the Abkhazian law.

[47] The Constitution of RA (1994, Art.53§24) also states that the President of Abkhazia, in accordance with the law, has the authority to make the final decision on issues of citizenship.

Evidently, the 2005 Law on Citizenship has both ethnic[48] and civic notions of citizenship. The main reason for its adoption was to "clarify the issue of citizenship" (Clogg, 2008, p.312), and in effect address the loopholes of the 1993 Law.

The most significant change with regards to dual citizenship is the restriction of dual citizenship to the Russian Federation (Art. 6). Taniya (2017) and Papaskiri (2017) suggested that the change was simply the act of codifying the *de facto* reality of Abkhazia, since by this time a large number of Abkhazians had acquired Russian citizenship, and this was for many their only secondary citizenship. This new legal restriction had therefore in practice little significance for ethnic Abkhaz, Russians, and Armenian (Clogg, 2008, p.312).

Another reason was to prevent the simultaneous possession of Abkhazian and Georgian citizenship, which was legally possible under the 1993 Law, despite the ongoing conflict. This was seen as a loophole, and according to Taniya (2017) and Papaskiri (2017), a significant reason behind restricting dual citizenship to only Abkhazian-Russian dual citizenship. This change meant that ethnic Georgians, living in Abkhazia and possessing Georgian citizenship, now had to renounce their Georgian citizenship if they desired to get Abkhazian citizenship (Clogg, 2008, p.312)[49].

Since Abkhazia's current dual citizenship policy **(a)** allows dual citizenship only with the Russian Federation, and **(b)** allows it with any other country only for ethnic Abkhaz, the Abkhazian law falls somewhere in the middle of the dual citizenship continuum (*see Appendix, p.59*).

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[48] The ethnic notion of both the 1993 and 2005 Citizenship Laws is with regards to the preferential treatment given to ethnic Abkhaz to acquire Abkhazian citizenship, without renouncing their previous citizenships.
[49] It must be noted that Abkhazia has been heavily criticized for its treatment of ethnic Georgians living in the Gal district, in particular with regards to their legal status. Following the war, over 40,000 ethnic Georgians chose to return to the area (Clogg, 2008, p.308). However, during the time they had lived as displaced persons in Georgia they had acquired Georgian citizenship. But with their return, they were seen as a fifth column by many Abkhazians (Clogg, 2008, pp.311 & 320). According to Clogg citizenship "[is] conferred on any individual or group that is in line with the political position on Abkhaz independence" (2008, p.320). As a result ethnic Georgians have been restricted from acquiring Abkhazian citizenship (Cucuberia, 2009; Parliament of RA, 2014; Kalandia, 2015). Furthermore, the failed 2009 Amendment and the approved 2013 Amendment to the Law on Citizenship were related to the issue of ethnic Georgians (Cucuberia, 2009; Taniya, 2017). Only in 2017, was their legal status resolved, after they were granted Abkhazian residency permits (passports) (Jopua, 2017; *see Appendix, Figure 9, p.68*). It is important to understand that the Abkhazian-Georgian dimension of citizenship merits its own independent research, which is why I will limit the discussion here to issues related to Abkhazian-Georgian dual citizenship.

5.3.2 Dual Citizenship Law of Transnistria

Similar to Abkhazia, there are two primary legal documents that outline the citizenship policies of the PMR. They are the 1992 Law on Citizenship and its replacement, the 2002 Law on Citizenship[50]. The following table outlines the clauses that refer to dual citizenship.

Table 2: Comparison of the Laws on Citizenship of Transnistria

Law on Citizenship of PMR (1992) 25th August 1992 Amended in 1993, 1995, 1999 & 2000	Law on Citizenship of PMR (2002) 5th March 2002 Amended in 2005 & 2007
Article 5	**Article 5**
A Transnistrian citizen has the right to hold dual citizenship with any other state, if that state allows it (i.e. dual citizenship)[51].	A Transnistrian citizen has the right to acquire multiple citizenships[52].
Article 18	**N/A***
A Transnistrian citizen will forfeit his citizenship upon acquiring another citizenship, if the other state requires the renunciation of previous citizenships.	
Article 12	**Article 12**
The Law makes no mention of the need to renounce one's previous citizenship upon naturalization.	
Article 24	**Article 23**
The President of Transnistria takes the final decision on all questions of citizenship (i.e. acceptance, naturalization, renunciation).	
N/A**	**Article 5§2**
	Transnistria also emphasizes the master nationality rule. The law states that Transnistria will consider the dual citizen as a citizen of Transnistria when they are on its territory.

N/A* signifies that the content highlighted in Article 18 of the 1992 Law does not appear in the 2005 Law.
N/A** signifies that there was no direct reference to the master nationality rule in the 1992 Law.

In addition to the above two documents, the Constitution of the PMR (1996, Art.3) also recognises the right of its citizens to have the citizenship of another state (i.e. dual citizenship). In 2006, the question was arose whether "multiple citizenships" as allowed under the Citizenship Law contradicted the clause in the Constitution which, depending on

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[50] At the time of conducting this research the PMR government was in the process of formulating a new Law on Citizenship. See
http://pravopmr.ru/View.aspx?id=JJyd5Sq%2bSdMk%2f4TrlrO5ww%3d%3d&q=двойное+гражданство and
http://en.vspmr.org/news/committees/grajdaninom-bitj-obyazan.html
[51] The section "if that state allows it" was removed by the an Amendment on 27th June 1993.
[52] The emphasis on the right of citizens to have "multiple citizenships", instead of simply dual citizenship was added in the May 2007 Amendment.

the interpretation, could be taken to mean that "only dual citizenship" is allowed. However, it was concluded that there is no contradiction and that it is permissible to interpret "dual citizenship" in a much broader context, analogous to mean "multiple citizenships" (Minister of Justice of the PMR, 2006).

From Table 2 it is clear that little has changed with regards to the laws dual citizenship. The interviews I conducted in Transnistria raised another point of interest. It was continuously stressed that Transnistria does not allow just dual citizenship, but rather multiple citizenships, and in effect places no regulation to limit multiple citizenships (Luzhansky & Lysenko, 2017). This demonstrates that Transnistria's citizenship policy is very liberal and falls further towards the "unrestricted acceptance of dual citizenship" end of the dual citizenship continuum (*see Appendix, p.59*).

5.4 Dual Citizenship, Liberal-Democratic Aspirations and Utilitarianism

Existing literature cites the utilitarian appeal of dual citizenship for unrecognized states, since by possessing a citizenship of a recognized country, the individual can more easily travel abroad, receive diplomatic protection and socio-economic benefits (e.g. higher pensions, and access to job-markets and healthcare) from the second country of citizenship, as well as maintain ties with their kin (Artman, 2013, p.690-691). Mühlfried (2010, p.9) uses the case of Abkhazia to cite the benefits of a Russian passport over an Abkhazian or Georgian one. Citizens of Abkhazia who acquire Russian citizenship become eligible for Russian pensions and are able to freely travel to and work in Russia.

Such advantages were highlighted in all the interviews I conducted in Tiraspol and Sukhum. Interviewees stated that dual citizenship facilitates the freedom of movement of their nationals to countries that do not recognize Abkhazia/Transnistria and their travel documents (Galinsky, 2017; Yastrebchak, 2017; Smyr, 2017; Chirikba, 2107). They further discussed how it increased access to property, health care, higher pensions, and education abroad.

While there are thus many advantages to dual citizenship, its downsides were also occasionally highlighted, such as questions on judicial authority over citizens, and issues of military service and tax regulation (Luzhansky & Lysenko, 2017). Also, the issue of military service has lead to Transnistrians renouncing their citizenship (even though their citizenship

de jure is not recognized), so that they could serve in the Russian military/government (Luzhansky & Lysenko, 2017)[53]. However, overall, and especially in Abkhazia, the respondents had trouble identifying any prominent and often-occurring problems resulting from having dual citizenship.

While dual citizenship has aided both Transnistria and Abkhazia, the question that comes next is whether the reasoning behind the adoption of dual citizenship policies is based on liberal-democratic aspirations (**Hypothesis 3**), or simply out of utilitarian calculations (**Hypothesis 4**). Alternatively, it could be a combination of the two reasonings.

During the interviews, the respondents repeatedly confirmed that due to political, economic, and travel difficulties citizens of Abkhazia and Transnistria had no choice but to acquire a passport of a recognized country. And in order for this act to be legally possible the two governments adopted their respective citizenship laws. According to Taniya (2017) and Papaskiri (2017), the Abkhazian government was compelled to make provisions for dual citizenship. Papaskiri even postulated that the more accepted the Abkhazian passport would be, the less there would be a need for dual citizenship (based purely on utilitarian considerations).

Interviewees in both capitals agreed that increasing individual rights and liberal-democratic aspirations can correlate with unrestricted dual citizenship policies (Galinsky, 2017; Chirikba, 2017; Papaskiri, 2017). Chirikba added that the permission for unrestricted dual citizenship goes hand in hand with the freedom of an individual to choose their citizenship. In Transnistria, it was stressed that the primary reason for allowing multiple citizenships was to increases an individual's rights and to give them more avenues to defend their rights (Luzhansky & Lysenko, 2017). These answers are in line with existing academic literature, as dual citizenship opens up rights and opportunities in multiple countries (Blatter, 2011, p.778).

When asked about the restrictive nature of Abkhazian dual citizenship law, the Abkhazian interviewees agreed, that in an ideal situation, there should be no restrictions on the choice on one's second citizenship (with the exception of Georgia) (Smyr, 2017; Chirikba, 2017).

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[53] This is because the Russian law requires its nationals to renounce any other citizenship when joining the Russian military/government service. See http://www.consultant.ru/document/cons_doc_LAW_73037/ and http://www.consultant.ru/document/cons_doc_LAW_48601/

However, Luzhansky & Lysenko (2017) and Papaskiri (2017) felt that dual citizenship with Russia provides individuals with adequate access to rights, and that there is as of yet no need to permit citizens to hold any alternative citizenship. Additionally, they cited the inappropriateness of allowing dual citizenship with countries that do not recognize Abkhazia (Smyr, 2017; Papaskiri, 2017)[54]. Papaskiri (2017) even went on to suggest that in Abkhazia there is no (direct) link between liberal-democratic aspirations and dual citizenship, as the decision to allow dual citizenship was not made to increase Abkhazia's international legitimacy - this is a crucial statement.

It also seems that in both cases, but especially in Abkhazia, the reason behind adopting dual citizenship policies was to enhance individual rights, rather than to simply foster liberal-democratic aspirations. By obtaining Russian passports, Abkhazians were able to move from "one zone of indistinction – that is, total lack of political recognition – to another – dependence on the Russian state" (Artman, 2013, p.697). A similar, but less prominent, motivation could be observed in Transnistria. Thus dual citizenship has allowed both unrecognized states to ensure that they and their citizens are able to survive and improve their situation amid international isolation. Therefore, I conclude that both cases confirm **Hypothesis 4**.

However, if I analyze the reasoning behind the unrestricted nature of Transnistria's dual citizenship policy, then the argument of liberal-democratic aspirations can be brought forward. This leads me to the supposition that while the granting of permission for a secondary citizenship in unrecognized countries is based on utilitarian concerns, the reasoning for allowing more than two citizenships may be based on a state's desire to display its level of liberal democracy by allowing its citizens the freedom to choose any (additional) citizenship. However, this argument needs to be tested further, and it is as of yet not possible to either accept or reject **Hypothesis 3**.

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[54] Smyr (2017) and Papaskiri (2017) suggested that reciprocal recognition of dual citizenship could be used as a bargaining chip in Abkhazia's efforts to gain international recognition. Taniya, 2017 and Smyr, 2017 suggested that Abkhazia may allow its citizens to have citizenship of countries besides Russia, in exchange for international recognition. Furthermore, this restriction is also seen as a measure to protect Abkhazia's statehood (Taniya, 2017).

5.5 Recognition of the Passport as a Valid Document

A physical symbol or manifestation of a state's sovereignty and individual's citizenship is the passport issued by that state. Therefore it is useful to discuss how Abkhazian and Transnistrian citizenships materialize through the passport, and how this it is related to dual citizenship.

Just like in the Soviet Union and Russia, the Republic of Abkhazia issues both internal (green) and external (blue) passports. Internal passports are used as personal identification documents, similar to ID cards, and carry basic personal information along with household registration information, marriage details and details of children. The external passport's purpose is to facilitate international travel of the citizen. On occasion, internal passports of certain countries are accepted as valid international travel documents. This is analogous to use of ID's issued by EU member states, which can be used to travel within the European Union.

Following the collapse of the USSR many Abkhazian residents lacked valid documents, and kept using their (internal) Soviet passports as valid identification documents. Individuals who did not have (internal) Soviet passports were able to receive external USSR passports along with Form №40 (Papaskiri, 2017). The form indicated the person's household registration information and was used to prove that they were Abkhazian residents[55]. Only in 2006 did Abkhazia begin issuing its own internal passports, each with a 10-year validity (1tv.ru, 2006; Malaev, 2017). A new version of the internal passport has been in circulation from 2016 (Begunov, 2016; Sputnik, 2016; *see Appendix, Figure 7, p.67*), and external passports have been distributed from 2010 (Lenta.ru, 2010; *see Appendix, Figure 8, p.68*). However, they are currently recognized as valid travel documents only in Russia, Nicaragua, Venezuela, Nauru, Vanuatu, Nagorno-Karabakh, South Ossetia, Transnistria, and the Cayman Islands (Malaev, 2017)[56].

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[55] The Russian Federation began issuing its first external passports only in 1997, but previously issued external USSR passports remained valid.

[56] Taniya (2017) stated that his government has made requests to governments that do not recognize Abkhazia, to accept its passports as valid travel documents (similar to the situation of Taiwan, Kosovo, and Palestine). Another practical issue that Abkhazia faces are the restrictions third countries place on Abkhazian citizens holding Russian passports issued by the Russian Consulate in Sukhum. Since many states consider Abkhazia an occupied territory they question the legality under which the passports are issued (Taniya, 2017; Chirikba, 2017; Papaskiri, 2017). Because of this there have been cases where Abkhazian-Russian citizens have been denied visas and been discriminated/restricted in their travel. However, according to (Taniya, 2017) there is no legal

Transnistria began issuing internal (red) passports in 2001 (*see Appendix, Figure 10, p.68*)[57]. Prior to this Transnistrians used either old Soviet passports[58] or a passport of another government with an extra insert (Malaev, 2017). Notably, unlike Abkhazia, Transnistria has refrained from distributing its own external passports due to its lack of international recognition. There exists nonetheless a Law on the Passport of the PMR Citizen (2002), which provides guidelines on external (blue) passports. Transnistrian (internal) passports are recognized as valid travel documents only in Abkhazia and South Ossetia, in addition to being also recognized as a valid internal document in Moldova (Protocol on mutual recognition of activities on the territory of Transnistria and Moldova documents issued by the competent authorities of the Parties, 2001)[59].

It is clear that the absence of state passports until 2001 in Transnistria and 2006 in Abkhazia contributed to the government's desire to ensure that their citizens can easily travel beyond their territory by other means. And as discussed in the previous section, allowing dual citizenship with an internationally recognized states was seen as the only way to achieve that goal. This situation did not change even after the distribution of Abkhazian internal/external passports and Transnistrian internal passports as they received limited international recognition. Thus it was only logical for these states to maintain policies that accommodate the legal acquisition of another citizenship and make it possible for their citizens to obtain an internationally recognized passport. This evidence further supports **Hypothesis 4**, which stated that unrecognized states adopt favorable dual citizenship policies for utilitarian reasons, which is in this case the ability to travel.

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basis for such treatment since under Russian/international law all Russian passports are equal regardless of where the passport was issued.

[57] The first passports were issued in 2001 in accordance with the Presidential Decree on the Passport of the PMR Citizen. See http://pravopmr.ru/View.aspx?id=A4UGQGqXtAsVqKOHrcHv5A%3D%3D

[58] Soviet Passports lost their validity in the PMR on 31st December 2003. See http://pravopmr.ru/View.aspx?id=UMkiAMiqUtKBRGmxIaTQeg%3d%3d&q=двойное+гражданство

[59] Yastrebchak (2017), citing this protocol, argued that if Moldova recognizes the Transnistrian passport as an identification document, then other governments should also be willing to recognize it. In 2017, the Transnistrian government, following Russia's recognition of the Donetsk and Luhansk passports as valid travel documents, sent a request to the Russian government asking for it to recognize the internal Transnistrian passport as a well. This was the not the first time such a request happened, but according to Luzhansky & Lysenko (2017) and Yastrebchak (2017), the PMR government decided to publicize this event because it felt the need to make the international society aware of "what is happening".

5.6 Dual Citizenship, Migration, and Diaspora

Hypothesis 1 suggested that if a state has either a large immigrant population, a large emigrant population, or a large diaspora this affects the likelihood of an unrecognized state adopting favorable dual citizenship policies.

Under Abkhazia's Law on Citizenship (2005, Art.5§a), the Abkhaz diaspora, regardless of their place of residence, are automatically entitled to Abkhazian citizenship without having to give up their previous citizenship(s), a provision that increases the liberal nature of the Abkhazian dual citizenship policy[60]. This is because the national narrative is that Abkhazia is the ancestral land of the Abkhaz, which is why the Abkhaz diaspora should have the right of return to their motherland (Preamble 3)[61]. Smyr (2017) used this argument to state that Abkhazia has the right to give priority to ethnic Abkhaz, particularly with regards to them acquiring Abkhazian citizenship more easily, because historically the Abkhaz were forced to flee their homeland and had until recently limited opportunities to return. Thus, this legal provision gives Abkhaz the opportunity to return to their homeland (Khashig, 2005; Clogg, 2008, p.319)[62]. In practice this has convinced a number of Turkish-Abkhaz and Syrian-Abkhaz to move to Abkhazia (Clogg, 2008, p.309; Begunov, 2016).

Papaskiri (2017) also suggested that Abkhazia is promoting the return of the Abkhaz diaspora to prevent a demographic crisis where the Abkhaz would (once again) become the minority

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[60] During research, I discovered that there is an additional interpretation for Articles 5 and 6. According to Article 5§a, ethnic Abkhaz, regardless of where they are born and whether they have another citizenship, are considered to be Abkhazian citizens. This would mean that ethnic Abkhaz who are born on the territory of Abkhazia and migrate to a country besides Russia (third country) are allowed to acquire the citizenship of that country. However, in order to travel to a third country, they would first need to have a Russian passport. Thus, upon naturalizing in a third country, if that country does not require the renunciation of previous citizenships, the ethnic Abkhaz could potentially come to acquire three citizenships, since under all laws, including the Law on Citizenship of the Russian Federation (2002, Art.6), this would be possible. But even if a third country (which does not recognize the Abkhazian citizenship) required the renunciation of the current citizenship, the individual would only have to renounce their Russian citizenship. In effect the individual would remain a dual citizen of the third country and Abkhazia. Based on this interpretation, it can be argued that, compared with minorities, ethnic Abkhaz living in Abkhazia are given more avenues to defend their rights. As it is unlikely for such a scenario to occur in actuality, one can as of now only speculate about the discrepancy this may result in. Further research would need to be done to explore the implications of this loophole.
The main reason why I did not become aware of this contradiction earlier on and kept interpreting Article5§a as directed to the diaspora, is because that was the narrative/explanation used during the interviews.
[61] Interestingly, this is not the only case of a state applying preferential rules for an ethno-cultural group affiliated with it. Countries like Germany, Denmark and Spain give their respective diaspora easy access to citizenship (Pogonyi, 2011, p.699).
[62] The Abkhazian Parliament has also passed other laws, such as the Law on Repatriates (1998), to encourage the return of Abkhaz diaspora. See
http://presidentofabkhazia.org/upload/iblock/e85/Закон_о_репатриантах_2015_03_31_13_16_13_782.pdf

in their ancestral land. Despite the general freedom the Abkhaz enjoy with regards to their second citizenship there is one important caveat. If desired, it is possible to restrict ethnic Abkhaz from simultaneously having Abkhazian and Georgian citizenship by citing Article 5§a, which prevents ethnic Abkhaz who work against the sovereignty of the Republic of Abkhazia from acquiring its citizenship.

In contrast to Abkhazia, Transnistria lacks a true diaspora as Transnistria is not the ancestral homeland of any particular ethnic group, but a region in which over the centuries different peoples have settled. Thus, it is quite logical that the Transnistrian Citizenship Law lacks any reference to a diaspora, which could be used to incentivize Transnistrians to resettle in the region[63].

When considering the immigrant argument for the allowing of dual citizenship, it is unlikely to be a reason for the adoption of the current citizenship policies in Abkhazia and Transnistria[64]. This is because there is a very low level of immigration to these regions that could result in demographic pressure to accommodate the immigrants via the adoption of favorable citizenship policies. That said, it must be noted that the naturalization laws of both countries differ[65]. As mentioned above, Transnistrian law does not require the renunciation of one's previous citizenship (Art.12), while Abkhazian law does require it (Art.13). There is, however, one exception. A very literal interpretation of Article 13 may suggest that even Russian citizens have to renounce their Russian citizenship upon naturalization. However this is in practice not the case and naturalizing Russian citizens are not required to renounce their Russian citizenship (Papaskiri, 2017).

A similar conclusion holds true for the emigrant argument of the hypothesis since all Abkhazian and Transnistrian emigrants would already have to have a secondary citizenship

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[63] Ironically, ethnic Russian Transnistrians who go to work and live in Russia are in fact "returning to their ancestral homeland".

[64] Luzhansky & Lysenko (2017) stated that there is a large Transnistrian emigrant population in Russia, Italy, Israel, Germany, Canada, and the US. There is also a large level of out-migration from Abkhazia to Russia (Clogg, 2008, p.309).

[65] If we compare the naturalization laws of the two polities in general, it emerges the Transnistrian naturalization laws are less restrictive more liberal. In Transnistria an immigrant needs to only fulfill a one-year residency requirement, simply have been a former Soviet citizen or be married to a Transnistrian (Art.12). But in order to naturalize in Abkhazia an individual has to meet stricter requirements. For example, they have to have continuously lived in Abkhazia for ten years and be able to communicate in Abkhaz - national language (Art.13).

Also note, that members of the Abkhaz diaspora are not required to fulfill the conditions in Art.13 as they, by the simple virtue of being ethnic Abkhaz, are automatically entitled to Abkhazia citizenship.

in order to be able to travel abroad in the first place[66]. Therefore, there is no reason for the two governments to promote the retention of citizenship upon naturalization in another country.

Thus, based on analysis of the two cases, the following conclusions may be reached with regards to **Hypothesis 1**;

i) Immigration /Emigration has no obvious effect on dual citizenship policies.

ii) Existence of a diaspora causes a government to adopt favorable dual citizenship policies towards it.

5.7 Dual Citizenship and Identity

Hypothesis 2 envisages to explore whether the type of national identity (civic vs. ethnic) has an impact on the dual citizenship policies of unrecognized states. Abkhazia's foundations are based on ethnic (Abkhaz) nationalism[67], because, as discussed in *Section 5.1*, the primary reason behind the foundation of post-Soviet Abkhazia is the need to protect the national identity of Abkhazia from foreign influence (i.e. Georgia). In this sense, the idea of not being considered Georgian played an important role in the development of the Abkhazian identity (Artman, 2013, p.693).

Upon reading the Abkhaz Law on Citizenship one may immediately get the impression that it is quite restrictive with regards to who can gain Abkhazian citizenship. The Abkhazian law, as discussed in *Section 5.6*, gives preferential treatment on the issue of dual citizenship to ethnic Abkhaz. This provision may seem quite logical since the nation-state of Abkhazia is considered to be the only homeland of the Abkhaz, which is why steps must be taken to protect and promote their *national* identity and unity. That said, such a clause contradicts the universalist principles of belonging, which are being promoted in many (liberal democratic) states across the word.

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[66] An important duty of governments is to protect their citizens when they travel outside the country. But the lack of recognition makes it is difficult for these governments to protect their citizens and obliges them to work with the individual's second citizenship country (Luzhansky & Lysenko, 2017; Yastrebchak, 2017; Taniya, 2017; Papaskiri, 2017).
[67] This ethnic nature of nationalism is revealed in several legislations. For example, according to the Constitution of RA (1994, Art.49), only an ethnic Abkhaz can become the president. That said, according to the constitution all citizens of Abkhazia, who meet educational and age requirements, are eligible to hold other government/official positions. Also, the Law on State Language (2007), while guaranteeing ethnic minorities the right to freely use their languages, recognizes Abkhaz as the only state language and states that Abkhazian citizens must be able to speak Abkhaz (Art.2). Russian has the status of an official/working language.

Through the discussion with the interviewees, however, I was able to get greater insights, and realized that Abkhazia is not as much of an ethno-nationalist state as I thought it was. In my interview with Taniya (2017), he highlighted his government's efforts to promote a civic identity over an ethno-national one. He highlighted the importance of differentiating between the terms "Abkhaz", which has an ethnic connotation, and "Abkhazian", which has a civic connotation. Taniya further stressed the multicultural makeup of Abkhazia and the efforts undertaken to promote national unity while simultaneously protecting the ethnic identity of all peoples in Abkhazia[68]. According to a 2011 census, Abkhaz comprised just over 50% of the population, while Georgians, Armenians and Russians made up 19%, 17%, and 9% of the population respectively (Naseleniye Abkhazii, n.d.). In addition there also live smaller groups of Ukrainians, Greeks, Ossetians, and Turks in the country, clearly making Abkhazia a multi-ethnic society. Taniya further highlighted that a mono-ethnic Abkhazia would not be able to survive in the 21st Century, making it important to promote multiculturalism and peaceful relations with all peoples of Abkhazia. Such reasoning falls within the liberal-democratic discourse, which stresses the importance of consolidating all the ethnic groups of Abkhazia (Clogg, 2008, p.324), and demonstrates the slow movement of Abkhazia from an ethnic state to a civic state. This narrative is confirmed by numerous press releases from the President's Office and the Parliament have highlighted the multicultural makeup of Abkhazia[69].

Despite this rhetoric of multiculturalism, there is still limited amount of legislation that addresses minority rights (Clogg, 2008, p.311). What is more, there is even an opposing nationalist discourse among a section of society that emphasizes the importance of preserving the Abkhaz *nation* and preventing its assimilation (Clogg, 2008, pp.318-319). Thus, while there seems to be a change in adopting a more multicultural and civic identity, more time is

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[68] One example given by Kaniya (2017) and Smyr (2017) was the debate over mandatory quotas for ethnic minorities in parliament. They believed that quotas are not appropriate as they would further divide the nation along ethnic lines instead of helping build a civic and multicultural identity where everyone had equal opportunity to participate in politics. Kaniya also mentioned his ministry's efforts to promote multiculturalism, by recruiting staff from minority groups without the explicit use of quotas. Other examples that can be observed in society, according to Kaniya, are the increasing number of mixed marriages and reduced opposition to them within society. Furthermore, the Abkhazian government promotes the education of ethnic minorities in their own language, and runs schools that teach in Russian and Armenian (Clogg 2008, p.310; Smyr, 2017).

[69] For examples see the following links
http://presidentofabkhazia.org/about/info/news/?ELEMENT_ID=2535&sphrase_id=1624415 and
http://presidentofabkhazia.org/about/info/news/?ELEMENT_ID=5274&sphrase_id=1624415 and
http://www.parlamentra.org/rus/news/detail/detail.php?ELEMENT_ID=876

needed for this idea to be accepted across Abkhazia.

Papaskiri (2017) also highlighted that all citizens are equal before the law, and they cannot be discriminated against based on ethnicity (Constitution of the RA, 1994, Chapter 2). The multicultural make-up of Abkhazia was even highlighted in the Declaration on the State Sovereignty of the Abkhaz SSR, which stated that all peoples living in Abkhazia are considered to be citizens of the Abkhaz SSR (Supreme Council of the Abkhaz ASSR, 1990, Art.2). Thus, in effect it can be argued that there is a special treatment of ethnic Abkhaz when it is being considered who can become a citizen of Abkhazia, but once an individual gains citizenship they have equal rights as any other citizen, regardless of ethnicity.

Transnistria, on the other hand, is a civic state because its foundations are not based on ethnic nationalism. Transnistria has always been a multi-ethnic region[70], and its identity is not centered around ethnicity, but is rather an offshoot of the Soviet identity, which was also primarily a civic identity. According to Yastrebchak (2017), the Transnistrian identity is an identity based on territory and the multiculturalism resulting from a mix of multiple ethnic groups[71]. Furthermore, Transnistria, having been a separate region from the rest of Moldova/Romania throughout much of its history, has created a separate and distinctly non-Moldovan/Romanian identity (Galinsky, 2017). This is combined with another important component in the Transnistrians' identity, namely their identity as Russian speakers, regardless of ethnic background. This naturally strengthens their connection with the Russian Federation. This is helped with the fact that Transnistria sees itself, along with the Russian Federation, as the continuer state of the USSR as it, unlike Moldova, never declared independence from the Soviet Union (Galinsky, 2017).

Because of these factors, it was stated that ethnicity plays no role in Transnistrian Citizenship Law (Luzhansky & Lysenko, 2017). Additionally, the master nationality rule was stressed on several occasions which implies that an individual is always first a Transnistrian, and only

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[70] According to the 2015 Census the ethnic composition was: Russians 29.1%, Moldovans 28.6%, Ukrainian 22.9%, Transnistrian 0.2%, other ethnicities 5.6%, undeclared 13.8% (Tynyaev, 2017). This was also the first instance where respondents began writing down "Transnistrian" as an ethnic identity. These proportions have remained relatively unchanged from the previous census. See
http://pop-stat.mashke.org/pmr-ethnic-loc2004.htm
Also, in 2015 there were 475,665 permanent residents in Transnistria, a reduction of almost 80,000 compared to the 2004 census (Government of Transnistria, 2016).
[71] For an analysis of the Transnistrian identity development see Solnari (2003).

then a citizen of the other state(s) of citizenship (Yastrebchak, 2017). Hence it was often echoed that the secondary citizenship has little to do with identity, but is rather a citizenship of convenience (i.e. utilitarian) acquired to make life easier (Galisnkii, 2017; Yastrebchak, 2017). And the acquisition of a secondary citizenship is not seen to undermine the patriotism of Transnistrian citizens (Galinsky, 2017)[72].

Another argument in favor of unrestricted dual citizenship put forward in Transnistria is the opportunity it provides citizens to maintain contact with their kin state (Luzhansky & Lysenko, 2017). This means that ethnic Moldovans, Russians, Ukrainians, and other minorities are able to maintain ties with their kin states and their families living in them[73]. Such reasoning was not cited in Abkhazia. The obvious reason for this is that ethnic Russians make up less than 10% of the population (2011 figure) (Naseleniye Abkhazii, n.d.).

Despite the differences in the ethnic/civic notions on which Abkhazia and Transnistria are founded, there are several important commonalities. Firstly, in both states the ethnicity of the person is still written down in the internal passports[74] - even though this is not a mandatory requirement in Transnistria (Law on the Passport of the PMR Citizen, 2002, Art.2§5и; *see Appendix, Figure 7 & 11, pp.67-68*). The most likely reason behind this is that it is simply a leftover from the time of the USSR, and does not really have any legal (discriminatory) basis (Smyr, 2017). However, this does not mean that individuals cannot be discriminated against in daily life when their ethnicity is easily identifiable from their passports.

Another commonality concerns the question of dual citizenship for government officials. Under the citizenship laws of many countries it is often the case that government officials are limited/prevented from having a secondary citizenship, due to possible conflicts of interest that could arise. However, due to the necessity of international travel and the limited recognition of Abkhazian/Transnistrian passports, officials of both countries are required to maintain a second citizenship. According to Luzhansky & Lysenko (2017) and Yastrebchak

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[72] It is also interesting to note that in Transnistria, unlike for example in Russia, citizens are not legally required to declare their other citizenships (Luzhansky & Lysenko, 2017; Yastrebchak, 2017).

[73] Similar reasoning was put forward by Krasniqi (2010, p.17) in his study on Kosovo, where he found that by allowing dual citizenship, Kosovo was able to accommodate the needs of the Serb minority who primarily live along the border with Serbia.

[74] In a 2015 census in Transnistrian, stating one's ethnicity was optional (Question 7). See http://mer.gospmr.org/gosudarstvennaya-sluzhba-statistiki/perepis-2015/obrazczy-blankov-perepisi.html In the Soviet passport, ethnic identity was also included (called the Fifth Line) until 1990, and this is clearly a leftover from that period. For further information see http://slavculture.ru/mir/1474-pyataya-grafa.html

(2017), there is no official decree in Transnistria on which secondary passport the civil servant/official should which is why each department makes their own regulation. That being said, according to Galinsky (2017) *de facto* officials are required/encouraged to have only a Russian passport. In Abkhazia, on the other hand, where dual citizenship is only allowed with Russia, all Abkhazian officials unsurprisingly hold a Russian passport, and are compelled to use standard Russian passports when travelling for official work to a country that does not recognize Abkhazian passport (Chirikba, 2017).

Consequently, it is possible to conclude that a state (like Abkhazia) whose foundations are based on ethnic nationalism will have citizenship policies that favor the majority ethnic group, while a state (like Transnistria) that has civic foundations will have more universalist policies, granting individuals equal opportunity to gain the citizenship of that country, regardless of their ethnicity. This confirms **Hypothesis 2**.

5.8 Dual Citizenship, Passportization, and Patron State Influence

Section 3.2 discussed how patron states have played an active role in the phenomenon of passportization. Russia has made use of passportization policies in Abkhazia, South Ossetia, and Crimea, and has also provided easy access to Russian passports for Transnistrians. Thus, this section will test the **Hypothesis 5**, which proposed that a high level of passportization by the patron state influences the unrecognized state to adopt restrictive dual citizenship policies.

The passing of the Law on Citizenship of the Russian Federation (2002, Art.14) in May paved the way for simplified procedures for former Soviet citizens to acquire Russian citizenship. Under this law, former USSR citizens not possessing a citizenship of any of the former Soviet Republics could acquire Russian citizenship. This new law was exploited to increase the conference of citizenships to residents in Abkhazia (International Crisis Group, 2006, p.18), and from June 2002, the Congress of Russian Communities of Abkhazia[75] began collecting Soviet documents from civilians and took them to Sochi in order to swap them for Russian passports (Khashig, 2002). Since Abkhazians still carries our-dates Soviet passports and refused to accept Georgian passports (Littlefield, 2009, pp.1471-1472), the Sukhum government encouraged this activity. Furthermore the government saw this activity as a guarantee of protection in case Georgia was to engage militarily in the future (Mühlfried,

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[75] This is an Abkhazian political party.

2010, p.10; Artman, 2013, p.690). This point was confirmed by Taniya (2017), who said that his government had greatly welcomed this move[76]. In other words, Abkhazia had no choice but to accept Russia's passportization policy, as it was the only logical and readily available option (Papaskiri, 2017). Gaining Russian passports further served as a symbol of "un-belonging" from Georgia (Artman, 2013, p.695).

This passportization policy was active in Abkhazia until the country's recognition by Russia in 2008. However, with Abkhazia's recognition, Abkhazians who had yet to acquire Russian citizenship became ineligible, as all individuals applying for naturalization in Russia have to renounce any other citizenship (Law on Citizenship of the Russian Federation, 2002, Art.14§2.1c; EA Daily, 2016)[77]. Prior to this, this regulation did not apply to Abkhazian citizens because Abkhazia was not recognized by Russia, meaning that their citizenship was also not recognized. Those who had applied for Russian citizenship before 2008 had been considered as stateless persons by the Russian Federation (Littlefield, 2009, p.1473). However, the Agreement between the Russian Federation and the Republic of Abkhazia on Alliance and Strategic Partnership (2014, Art.13)[78] took steps to simplify the procedures for Abkhazians to gain Russian citizenship (without renouncing their Abkhazian citizenship). Currently the two governments are in the process of finalizing a bilateral agreement on dual citizenship (Avidzba, 2017)[79].

When asked if the passportization was a threat to Abkhazian sovereignty as it could lead to the full integration of Abkhazia in to the Russian Federation, Taniya (2017) stated that Russia's actions should rather be seen as strengthening of Russia's position vis-à-vis Georgia, and therefore as something positive. Furthermore, according to Toal & O'Loughlin's (2014) research, the majority of Abkhazians, including ethnic Russians, oppose unification with Russia. This goes to show that passportization/acceptance of Russian citizenship does not need to correlate with the desire to unite with one's patron/kin state, and instead occurred

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[76] Interestingly, prior to this Abkhazian officials had attempted to acquire neutral international travel documents for residents but were unsuccessful (Littlefield, 2009, pp.1472-1473; Chirikba, 2017; Papaskiri, 2017).
[77] Naturally, those who acquired Russian citizenship before this date could maintain both Russian and Abkhazian citizenships following Abkhazia's recognition by the Russian Federation.
[78] To see a previous draft version of this Agreement see
http://parlamentra.org/rus/news/detail/detail.php?ELEMENT_ID=1080
[79] Any such agreement will be made in accordance with the 2005 Law on Citizenship (Art.2). It is important to note that if the international agreement establishes rules that are different to that of the 2005 Law, then the rules of the international agreement will take precedence.

instead out of utilitarian needs, like proposed in **Hypothesis 4**[80]. Papaskiri (2017) added that legally, under Abkhazian law there can be no discussion on integration with the Russian Federation as this is prohibited by the Law on Voting (Referendums) (1996, Art.4). The above statements demonstrate there is no fear/desire of being absorbed into the Russian Federation.

When discussing the reasons behind the restriction in the 2005 Citizenship Law, Smyr (2017) stressed that the motivation for limiting dual citizenship solely to Russia was that Abkhazia felt that it was important to build strong connections with those countries that help it the most, and having a more restrictive policy was seen to help this goal. Additionally, Papaskiri (2017) postulated that since by 2005 many Abkhazian citizens had already acquired Russian citizenship, the 2005 Law, simply legalized the *de facto* situation in Abkhazia. Therefore, Abkhazia was *de facto* not restricting the rights of Abkhazians, since for most their only option for secondary citizenship had been with Russia.

By contrast Russia's passportization policy in Transnistria has been minimal. Luzhansky & Lysenko (2017) and Galinsky (2017) refuted the existence of any specific passportization/Russification policy, such as the one that was observed in Abkhazia and South Ossetia[81]. In fact, according to Galinsky (2017), following the breakup of the USSR it was not easy for Transnistrians to acquire Russian passports, and for many the most practical option was to acquire a Moldovan passport for international travel. Only when Russia simplified its policy of granting citizenship to former USSR citizens and their descendants in 2002, were Transnistrians able to easily acquire Russian citizenship. According to Yastrebchak (2017), his government unofficially encouraged its citizens to acquire Russian citizenship whenever possible[82]. This is sometimes complicated by the fact that the Russian government requires individuals, who apply through the simplified procedures, to prove that they do not have Moldovan citizenship (Law on Citizenship of the Russian Federation, 2002,

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[80] A contrasting situation is that of South Ossetia, where the majority of the population desires to unite with their kin in North Ossetia, and thus in effect with Russia (Toal & O'Loughlin, 2014). As a result, the passportization process and other association agreements have put South Ossetia on its desired path to eventually become a territory of the Russian Federation.

[81] Also, when asked if the country of secondary citizenship (Russia, Moldova, Ukraine) interferes in the internal affairs of Transnistria by trying to protect its citizens in Transnistria, Yastrebchak (2017) said that this rarely happens. A similar response was received during my interview with Kaniya (2017) in Sukhum.

[82] This is in line with the desire to closely associate with Russia, which was confirmed in the 2006 Referendum, as well as by Toal & O'Loughlin's (2014) research, which showed that around 50% of the population desire to be integrated into Russia. Also, according to the Russian Public Opinion Research Center (2016), 86% of Transnistrians see their future in a unification with Russia.

Art.14§2.1c). Currently, Tiraspol is working with Moscow to further simplify the procedures for the acquisition of Russian citizenship, and the Duma is currently in the process of considering amendments to its Law on Citizenship, so that Russian speakers could more easily acquire Russian citizenship (Shushkina, 2017; Supreme Council of the PMR, 2017). Despite the lack of a passportization policy, strong ties have been promoted through Russia's policies towards its compatriots, who are broadly defined as individuals who have a historical affiliation with Russia. Through such policies, Russia facilitates cultural, social, and political interaction with its compatriots, encourages their resettlement in the Russian Federation, and assists in their education (Law on Russian Compatriots, 1999, Art.13 & Art.17§6). These policies were also mentioned during the interviews (Luzhansky & Lysenko 2017; Galinsky, 2017).

Based on this analysis it is possible to say that Russia's passportization policy contributed to Abkhazia's decision to restrict dual citizenship through the 2005 Law. Conversely, in Transnistria, despite the absence of a visible passportization policy, the mere act of receiving Russian assistance has created a favourable image of Russian, which has resulted in the *de facto* preference by citizens to hold Russian citizenship as their secondary citizenship. Thus, these findings confirm **Hypothesis 5**.

5.9 Dual Citizenship and Influence from the Parent State

During the interviews, it became clear that there was one factor that I had not considered. That was the influence of the parent state on the citizenship policies of Abkhazia and Transnistria.

Following the breakup of the USSR, Georgia and Moldova followed the *new state model* of citizenship, and both states consider all people born within their *de jure* territory as well as those who lived on the territory at the time of the disintegration of the USSR to be their citizens (Littlefield, 2009, p.1471; Mühlfried, 2010, p.9; Supreme Council of the PMR, 2017; Luzhansky & Lysenko, 2017). Therefore, according to Georgia all Abkhazian residents are its citizens (Law on Citizenship of Georgian, 1993, Art.3), and under Moldova's complicated citizenship law many Transnistrian residents are eligible for and thus considered to be Moldovan citizens (Law on Citizenship of Moldova, 1991, Art.2; Law on Citizenship of

Moldova, 2000, Art.11-12)[83]. The only legal way not to be considered a Georgian/Moldovan citizen is to officially renounce the citizenship according to existing Georgian/Moldovan legal procedures[84]. This position is widely accepted internationally, and not having a Georgian/Moldovan passport does not prove that an Abkhazian/Transnistrian is not a citizen of the parent state that claims them. Because of this it has been argued that under international law Abkhazian/Transnistrian citizens should not be considered as stateless as they were never denied citizenship, but rather intentionally refused to accept the citizenship of the parent state (Littlefield, 2009, p.1471-1473)[85]. However, at the same time, such individuals are also considered to be stateless by some countries (e.g. Russia). This ambiguity in the international system was highlighted by Papaskiri (2017), who stated that Abkhazian citizens, until they began acquiring Russian passports, fell into a gray zone where they were simultaneously considered as *de jure* Georgian citizens and stateless persons, depending on the authorities. This shows that the international system still lacks comprehensive regulations.

Luzhansky & Lysenko (2017) stated that it has been occasionally observed that Moldova forces Transnistrians to acquire a Moldovan passport and has made it difficult for Transnistrians (especially those holding a non-Moldovan passport) at border crossings. But in most cases the Transnistrian document is adequate as the Transnistrian passport is *de facto* accepted in lieu of a Moldovan passport/residency permit since the 2001 Protocol on mutual recognition of documents issued by Moldova and Transnistria. However, according to Galinsky (2017), Moldova has recently become more restrictive in granting citizenship to Transnistrians.

It was also continuously stressed that, due to the international non-recognition of Transnistria, its citizens are not legally obliged to renounce their Transnistrian citizenship when acquiring a citizenship of a country that does not accept dual citizenship. As a result, there are very few individuals who formally renounce Transnistrian citizenship. Similarly, most third countries (i.e. excluding Russia) would not require naturalizing Abkhazians to renounce their Abkhazian citizenship. However, as per laws of Abkhazia, they would be required to renounce their Abkhazian citizenship (*see Footnote 60, p.44*).

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[83] It must be also noted that Georgia and Moldova only allow dual citizenship under restricted circumstances (Law on Citizenship of Georgian, 1993, Art.1; Law on Citizenship of Moldova, 2000, Art. 24-26).
[84] These procedures are very complicated (Law on Citizenship of Georgian, 1993, Art.31 & Chapter 6; Law on Citizenship of Moldova, 2000, Art. 33, 37 & 38).
[85] The same can be said for South Ossetia.

One difference between Abkhazia and Transnistria is that the former does not allow dual citizenship with its parent state while the latter does. The restriction is completely logical, due the continuance of the conflict between the parent state and the state seeking secession. The Abkhazia-Georgia conflict has been more violent than the Transnistria-Moldova conflict. Not only were more people killed, injured, and displaced during the 1992-1993 war, but, following this period, cooperation has been limited if not non-existent. These factors, together with the historic grievances of the Abkhaz, make it reasonable for Abkhazia to prevent the existence of Abkhazian-Georgian citizens by adopting restrictive dual citizenship laws.

In the case of Transnistria there is no restriction on having the citizenship of the parent state. Following the collapse of the USSR, it was still possible to travel with the USSR passport, and as it came into disuse over time, Transnistrians had to acquire the passport of a recognized state. For many the easiest option was to apply for Moldovan citizenship, as Ukrainian and Russian citizenships were harder to get (Yastrebchak, 2017). Additionally, according to Galinsky (2017), there is no ethnic animosity towards the Moldovan people – the conflict is rather about on the "character" (i.e. political identity) of Transnistria. The government has therefore no reason to restrict its citizens from acquiring Moldovan citizenship in order to improve their welfare. I **hypothesize/conclude** then that the severity of the conflict has an influence on the restrictiveness of the dual citizenship policies towards the parent state. This in turn makes the Transnistrian Citizenship Law more liberal than that of Abkhazia.

Having hereby concluded the analysis, the following chapter will summarise the findings of this research. It will also discuss the caveats of the results presented and outline possible avenues for future research.

Chapter 6 - Conclusion

This research has shown that Abkhazia and Transnistria represent two divergent approaches to dual citizenship, despite arising out of similar historical and political circumstances. Both *de facto* states were part of a former Republic of the USSR, both declared independence upon the dissolution of the USSR, and both have failed to gain widespread international recognition. In addition, both have experienced strong Russian influence in their territory, are multi-ethnic and have a different ethnic composition from their parent state. Despite these similarities, however, Abkhazia limits its citizens to have dual citizenship only with Russia, while Transnistria places no such restrictions on its citizens. What makes Abkhazia's policy even more restrictive is that, upon naturalization, non-Abkhaz and non-Russian immigrants are required to renounce previous citizenships. Additionally, Abkhazia has preferential citizenship policies towards the Abkhaz diaspora, while Transnistria does not have such a policy.

Having identified these differences, this research went on to test five hypotheses in order to answer the research question, namely: what factors contribute to the adoption of divergent dual citizenship policies by unrecognized states in the post-Soviet space?

By analyzing academic literature and official documents, and conducting in-depth expert interviews I was able to identify the factors that lead to the divergent dual citizenship policies among the two post-Soviet unrecognized states. The research showed that;

1. The main reason for unrecognized states to allow dual citizenship is based on utilitarian concerns aimed at ensuring the survival of their citizens and themselves (**Hypothesis 4**);
2. Immigration/Emigration has no influence on in the dual citizenship policies of the two unrecognized states, but a (large) diaspora results in the state adopting favorable dual citizenship policies towards its diaspora (**Hypothesis 1**);
3. A state with a civic national identity (like Transnistria) will have more liberal dual citizenship policies than a state (like Abkhazia) that is built on ethnic nationalism (**Hypothesis 2**);
4. Heavy passportization by a patron state (like Russia) influences the *de facto* state (like Abkhazia) to adopt restrictive dual citizenship policies, which favor the patron state (**Hypothesis 5**);

5. Unrecognized states (like Abkhazia) that have a greater level of conflict with their parent state will not allow dual citizenship with the parent state;

6. It was not possible to either accept or reject **Hypothesis 3,** which postulated that unrecognized states that have liberal-democratic aspirations are more likely to adopt unrestrictive dual citizenship policies.

Consequently, the factors that play a significant role in the development of dual citizenship policies in *de facto states* are: utilitarian concerns based on the need to improve the citizens' welfare, the existence of a diaspora, the type of national identity (civic/ethnic), and the influence exerted by the patron state. Overall, it can be concluded that Transnistrian citizenship policy is more liberal than the Abkhazian citizenship policy due to differing degrees of influence of these factors.

This being the first of its kind comparative research into dual-citizenship policies of *de facto* states in the post-Soviet space, the reader may be curious to know about its generalizability. It may indeed be possible to deduce that similar factors also play in other unrecognized states, particularly those in those of the past-Soviet space (i.e. South Ossetia and Nagorno-Karabakh). This is because my research has demonstrated that, the main reason behind allowing for dual citizenship (with at least one recognized state) is utilitarian and driven by necessity. Beyond that, however, the type of national identity, the existence of a large diaspora, and the degree of support given by the patron state would result in the divergence of dual citizenship policies within the unrecognized states. Also, another influencing factor, especially for Armenia and South Ossetia, and to a lesser extent as observed in Transnistria, might be the desire of the *de facto* state to unite with their patron state, which I assume would lead to more favourable policies towards the patron state.

Despite the overall success in finding conclusive answers with regards to the reasons for the varying dual citizenship policies of the two cases, there are three caveats, without which this research would have been even stronger. The first limiting factor is that the research had to be conducted within the short span of three months under budgetary constraints. Because of this it was not possible to spend more time in Abkhazia and Transnistria to gather even more detailed insights. This restriction also made it impossible to travel to South Ossetia and Nagorno-Karabakh to expand the scope of this study. The second caveat regards the access to experts. It was only possible to secure a total of seven interviews during the period I spent
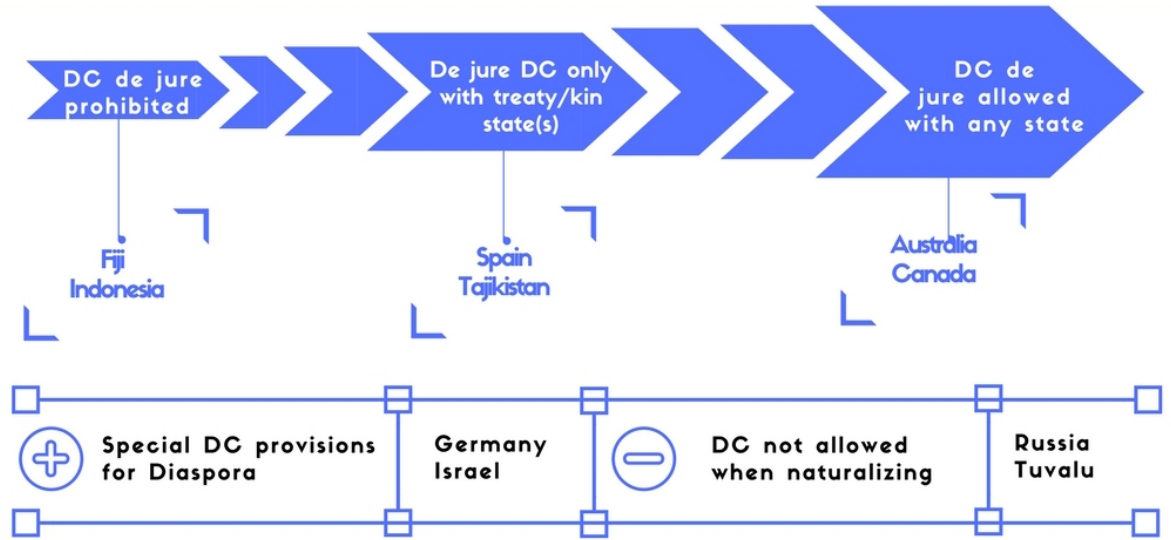
visiting the *de facto* states, and thus it is important to point out that a greater number of interviews might have led to different or more nuanced results. Lastly, the lack of online resources on parliamentary debates in relation to dual citizenship made it difficult to access the legislative side of the dual citizenship policies.

I am certain that, had it been possible to eliminate the above caveats, it would have been possible to improve the findings, and thereby the research's conclusiveness and generalizability. I would like to ask the reader to also keep in mind that this study was explorative in nature and should therefore be taken as only the first step towards a new research area of dual citizenship policies in unrecognised states in the post-Soviet space. During the research, it became for example evident that there is in some instances a discrepancy between the written law and its interpretation/application, which would make it interesting to go into greater detail and analyze these nuances. An obvious next step would also be to expand the number of cases to include all the post-Soviet *de facto* states, or to compare all existing unrecognized states using qualitative or quantitative analysis. Additionally, it is worth exploring how unrecognized states provide consular assistance to their citizens, and how the broader citizenship policies in the unrecognized states have evolved. Thus I hope that this research has added to both the field of citizenship studies and the study of unrecognized states, and will inspire other researchers to work in this new field.
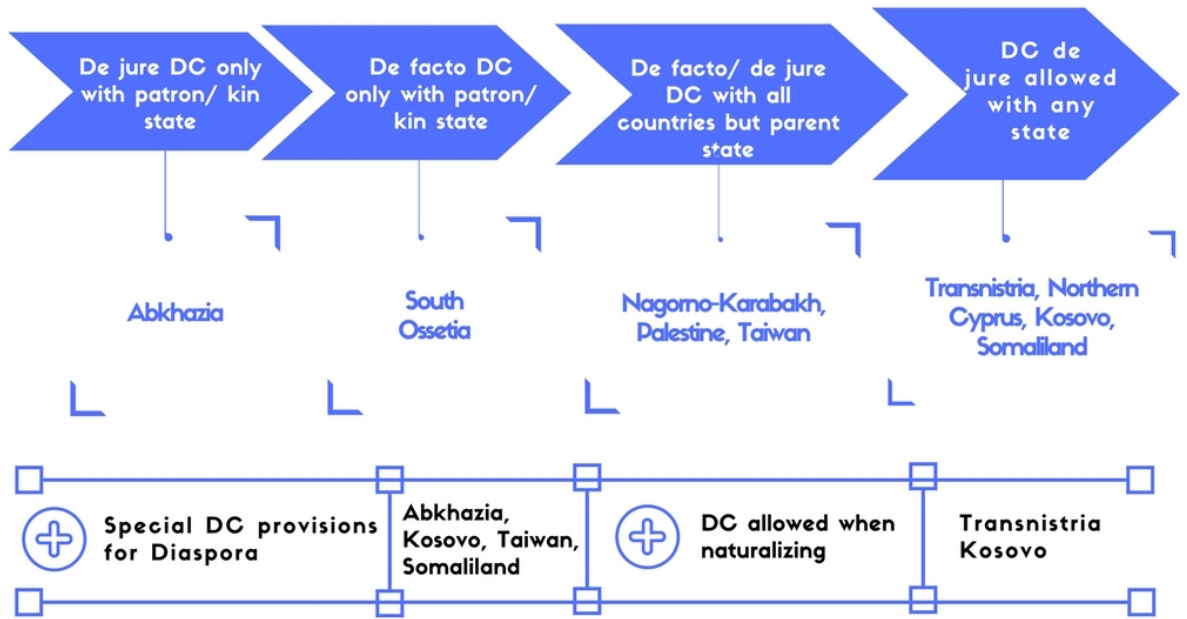
Appendix

Dual Citizenship Continuums

DUAL CITIZENSHIP (DC) CONTINUUM FOR RECOGNIZED STATES

DC de jure prohibited — De jure DC only with treaty/kin state(s) — DC de jure allowed with any state

Fiji
Indonesia

Spain
Tajikistan

Australia
Canada

⊕ Special DC provisions for Diaspora | Germany Israel | ⊖ DC not allowed when naturalizing | Russia Tuvalu

DUAL CITIZENSHIP (DC) CONTINUUM FOR UNRECOGNIZED STATES

De jure DC only with patron/ kin state — De facto DC only with patron/ kin state — De facto/ de jure DC with all countries but parent state — DC de jure allowed with any state

Abkhazia

South Ossetia

Nagorno-Karabakh, Palestine, Taiwan

Transnistria, Northern Cyprus, Kosovo, Somaliland

⊕ Special DC provisions for Diaspora | Abkhazia, Kosovo, Taiwan, Somaliland | ⊕ DC allowed when naturalizing | Transnistria Kosovo

List of Interviewees

Name	Position	Date of Interview	Place of Interview
Kan Taniya	Deputy Foreign Minister, RA	24th April 2017	Sukhum, Abkhazia
Sergey Smyr	Dean of the Faculty of Law, University of Abkhazia	24th April 2017	Sukhum, Abkhazia
Vyacheslav Chirikba	Former Minister of Foreign Affairs, RA	24th April 2017	Sukhum, Abkhazia
Oleg Papaskiri	Lawyer	25th April 2017	Sukhum, Abkhazia
Vladimir Luzhansky	Chief of the Consular and Legal Department, Ministry of Foreign Affairs, PMR	12th April 2017	Tiraspol, Transnistria
Vladlena Lysenko	Director of the Centre for Legal Innovations, Pridnestrovian State University named after T.G. Shevchenko	12th April 2017	Tiraspol, Transnistria
Ilya Galinsky	Head of the Department of Political Science, Pridnestrovian State University named after T.G. Shevchenko	13th April 2017	Tiraspol, Transnistria
Vladimir Yastrebchak	Advisor to the Supreme Council of the PMR Former Ministry of Foreign Affairs, PMR	13th April 2017	Tiraspol, Transnistria

Interview Questions

1. What are the advantages of dual citizenship for the citizens of the PMR/RA?

2. Are there any shortcomings related to dual citizenship in the PMR/RA?

3. Why did the PMR/RA government decided to allow dual citizenship? What led to changes in the provisions on dual citizenship in the Citizenship Laws PMR(2002)/RA(2005)?

4. Could you provide me any statistics on dual citizenship/naturalization/renunciation?

5. What is the government of PMR/RA doing to protect the interests/diaspora of citizens living abroad?

6. How important is the recognition of a passport as a recognized travel document?

7. Why does your government allow/not allow dual citizenship with the parent (Moldova/Georgia) state?

8. Has your relationship with Russia affected your citizenship policies in any way? How? Why?

9. Does the Russian Consulate being able to provide consular assistance to its citizens who are also citizens of PMR/RA undermine your sovereignty?

10. Does dual citizenship affect PMR/RA's domestic politics/policy? How?

11. Do government officials having dual citizenship create a conflict of interests?

12. Does one's identity get reflected on citizenship or vice versa? How?

13. Is there a link between democratization and citizenship law/dual citizenship law?

14. Do you see any future changes to the citizenship law?

Maps of Abkhazia

Figure 1: Map of the South Caucasus (1920s)
Source: Buxton (1926)

Figure 2: Map of the Caucasus in USSR (1952-1991)
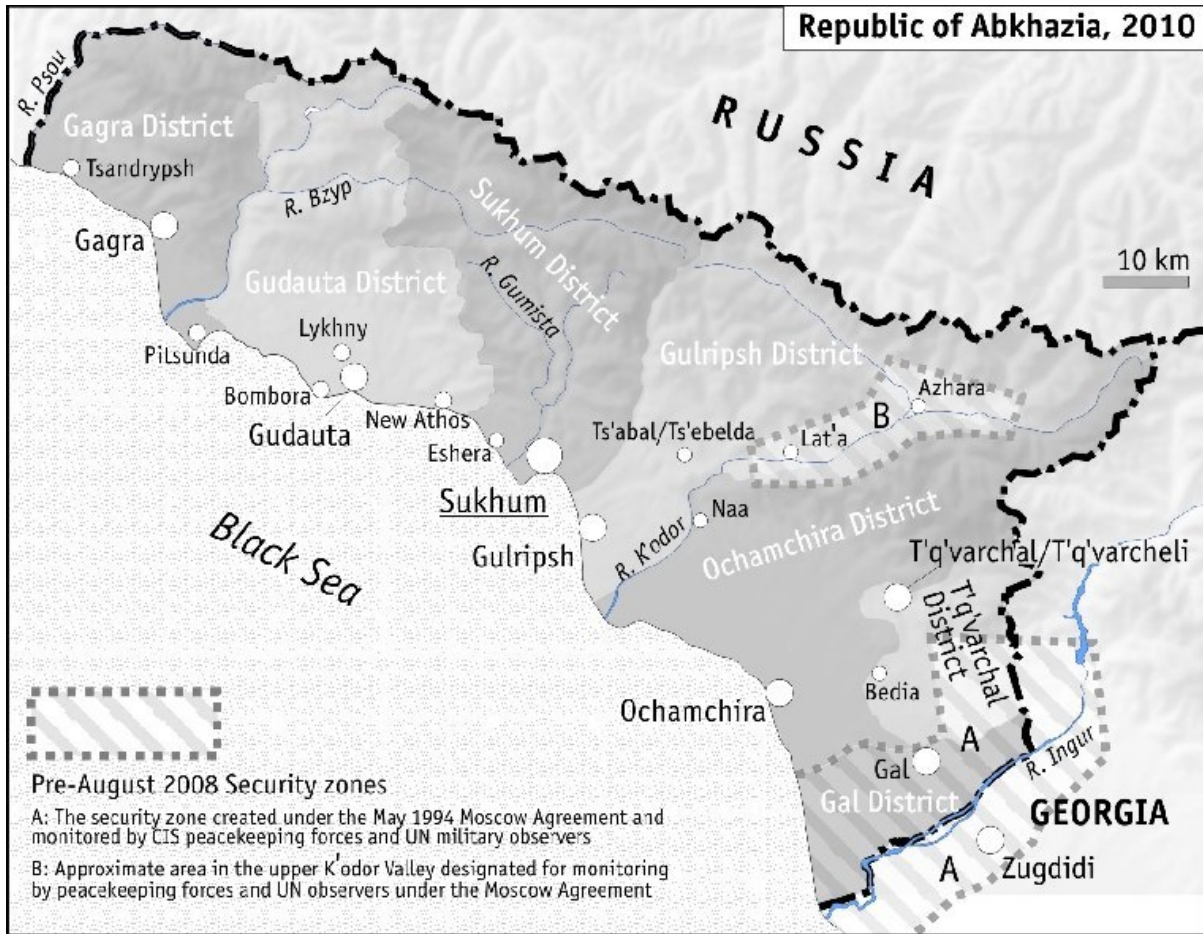**Source:** Armenica.org (n.d.)

Figure 3: Map of the Republic of Abkhazia (2010)
Source: Abkhaz World (n.d.)

Maps of Transnistria

Figure 4: Map of Greater Romania and Transnistrian ASSR (1918-1940)
Source: Anderson, A. (2005)

Figure 5: Map of Moldavian SSR (1941-1991)
Source: Anderson, A. (2005)
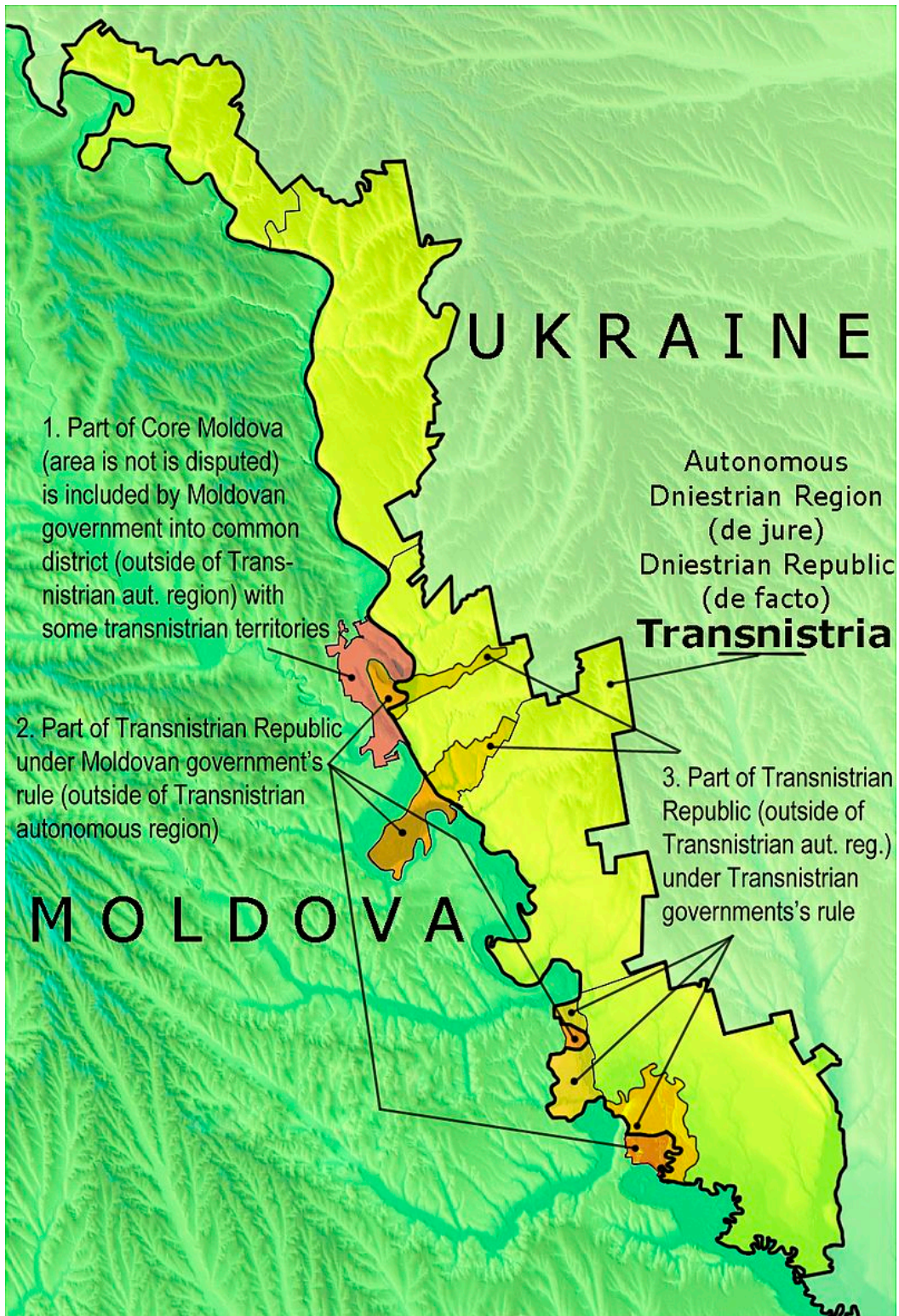
Figure 6: Map of Transnistria (post-1992)
Source: Cepleanu, S. I. (2014)
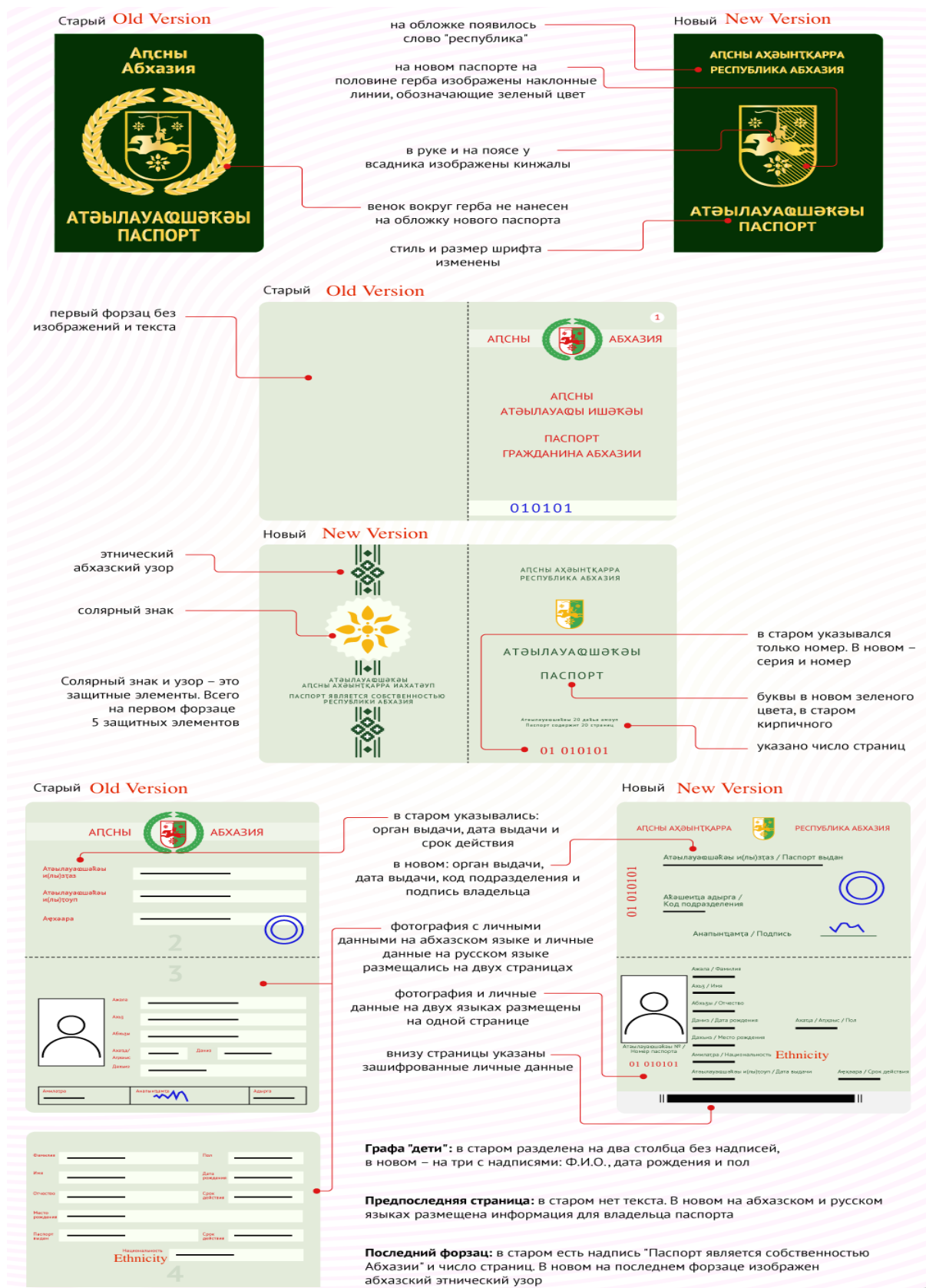
Images of Passports from Abkhazia and Transnistria

Figure 7: Changes in the Internal Abkhazian Passport
Source: Sputnik (2016)

Figure 8: External Passport of Abkhazia
Source: Apsny Press (2010)

Figure 9: Residency Permit (Passport) of Abkhazia
Source: OC Media (2017)

Figure 10: Internal Passport of Transnistria (with two different "red" colour covers)
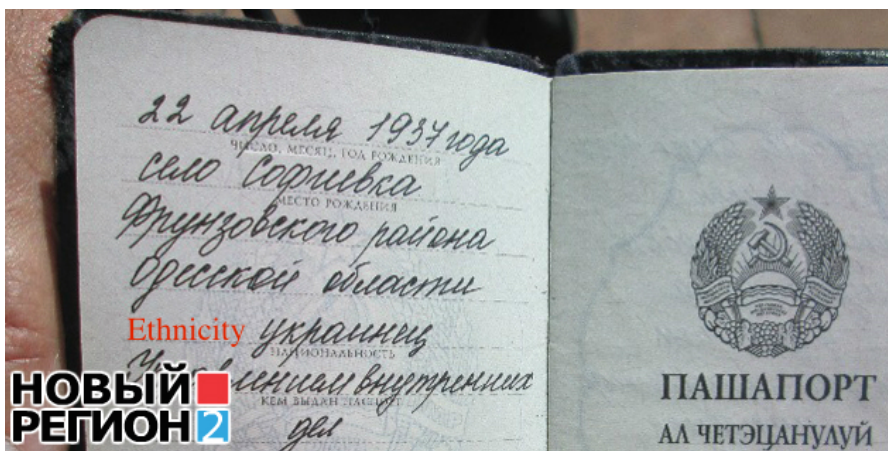**Sources:** Academic.ru (n.d.) and Ermachkova, T. (n.d.)

Figure 11: Internal page of passport where ethnicity is mentioned.
Source: NR2.it (2013)

Bibliography

Legal Documents

Abkhaz Republican Budget for 2016 (2015, December 31). О Республиканском бюджете на 2016 год. Retrieved from http://presidentofabkhazia.org/en/doc/const/

Abkhazian Representation in PMR (n.d.). 12 октября 1999 года принят Акт «О государственной независимости Республики Абхазия» [On 12th October 1999 the Act "On State Independence of the Republic of Abkhazia" was adopted]. Retrieved from http://abkhazia-pmr.org/holidays.php?id=51&rz=1

Agreement between the Russian Federation and the Republic of Abkhazia on Alliance and Strategic Partnership, (2014, November 24). Договор между Российской Федерацией и Республикой Абхазия о союзничестве и стратегическом партнерстве. Retrieved from http://kremlin.ru/supplement/4783

Amendment to the Law on Citizenship of PRM (1993, June 27). О внесении изменений и дополнений в закон ПМР «О гражданстве». Retrieved from http://zakon-pmr.com/DetailDoc.aspx?document=36355

Amendment to the Law on Citizenship of PRM (2007, May 4). О внесении изменений и дополнений в закон ПМР «О гражданстве ПМР». Retrieved from http://zakon-pmr.com/DetailDoc.aspx?document=62049

Charter of the United Nations (1945, June 26).

Constitution of the PMR (1996, January 26). Конституция Приднестровской Молдавской Республики. Retrieved from http://zakon-pmr.com/DetailDoc.aspx?document=36826

Constitution of the Republic of Abkhazia (1994, November 26). Конституция Республики Абхазия. Retrieved from http://presidentofabkhazia.org/en/doc/const/

Constitution of the Russian Federation (1993, December 12). Chapter 2: Rights and Freedoms of Man and Citizen. Retrieved from http://www.constitution.ru/en/10003000-03.htm

Council of Europe ETS 149 (1993, February 2). *Second Protocol amending the Convention on the Reduction of Cases of Multiple Nationality and Military Obligations in Cases of Multiple Nationality.* Retrieved from http://www.refworld.org/docid/3ae6b37f20.html

Council of Europe ETS 166 (1997, November 6) *European Convention on Nationality.* Retrieved from http://www.refworld.org/docid/3ae6b36618.html

Council of Europe ETS 43 (1963, May 6). *Convention on Reduction of Cases of Multiple Nationality and Military Obligations in Cases of Multiple Nationality.* Retrieved from http://www.refworld.org/docid/3ae6b37814.html

International Covenant on Civil and Political Rights (1966, December 19).

International Covenant on Economic, Social and Cultural Rights (1966, December 16).

Law on Citizenship of Georgia (1993, March 25). Retrieved from http://eudo-citizenship.eu/NationalDB/docs/GEO%20Organic%20Law%20on%20Citizenship%20of%20Georgia%20of%2025_3_1993,%20as%20amended%2020_12_2011%20(consolidated%20English%20translation).pdf

Law on Citizenship of Moldova (1991, June 5). Lege Nr. 596; cu privire la cetăţenia Republicii Moldova. Retrieved from http://lex.justice.md/viewdoc.php?action=view&view=doc&id=311903&lang=1

Law on Citizenship of Moldova (2000, June 2). Lege Nr. 1024; cetăţeniei Republicii Moldova. Retrieved from http://lex.justice.md/md/311522/
English version available at http://www.refworld.org/cgi-bin/texis/vtx/rwmain/opendocpdf.pdf?reldoc=y&docid=5509808b4

Law on Citizenship of Nagorno-Karabakh (1995, November 18). *Lghh k'aghak'ats'iut'yan himnakan skzbunk'neri masin*. Retrieved from http://www.nankr.am/hy/1250

Law on Citizenship of PRM (1992, August 25). Закон «О гражданстве ПМР». Retrieved from http://zakon-pmr.com/DetailDoc.aspx?document=36354

Law on Citizenship of PRM (2002, June 10). Конституционный Закон «О гражданстве ПМР». Retrieved from http://zakon-pmr.com/DetailDoc.aspx?document=60966

Law on Citizenship of RA (1993, December 10). Закон «О гражданстве Республики Абхазия». Retrieved from http://www.abhazia.com/book17-30.html

Law on Citizenship of RA (2005, November 8) Закон «О гражданстве Республики Абхазия». Retrieved from http://presidentofabkhazia.org/vize_president/dejatelnost/zacon_ra.pdf
English version available at http://presidentofabkhazia.org/en/vize_president/dejatelnost/zacon.pdf

Law on Citizenship of South Ossetia (2006, August 23). Конституционный Закон «О гражданстве Республики Южная Осетия». Retrieved from http://osembassy.ru/consul/constitutional-law/

Law on Citizenship of the Russian Federation (2002, May 31) Федеральный закон «О гражданстве российской федерации». Retrieved from http://www.consultant.ru/document/cons_doc_LAW_36927/
English version available at http://www.refworld.org/pdfid/50768e422.pdf

Law on Russian Compatriots (1999, May 24). Федеральный закон «О государственной политике Российской Федерации в отношении соотечественников за рубежом». Retrieved from http://www.kremlin.ru/acts/bank/13875

Law on State Language (2007, November 29). Закон «О государственном языке

Республики Абхазия». Retrieved from Retrieved from
http://presidentofabkhazia.org/en/doc/const/?PAGEN_1=2

Law on the Passport of the PMR Citizen (2002, March 2002). Закон «О паспорте
гражданина ПМР». Retrieved from
http://zakon-pmr.com/DetailDoc.aspx?document=61014

League of Nations TS 179 №4127 (1930, April 13). Convention on Certain Questions
Relating to the Conflict of Nationality Law. Retrieved from
https://treaties.un.org/doc/Publication/UNTS/LON/Volume 179/v179.pdf

Minister of Justice of the PMR (2006, November 20). Приложение к Распоряжению
Президента ПМР от 20 ноября 2006 года № 870РП [Annex to the Order of the
President of the PMR of November 20, 2006 No. 870RP]. Retrieved from
http://pravopmr.ru/Controls/EnterForce/EnterForceList.aspx?sd=20.11.2006

Montevideo Convention on the Rights and Duties of States (1933, December 26).

OSCE (1975, August 1) Final Act of Helsinki. Retrieved from
http://www.refworld.org/docid/3dde4f9b4.html

Protocol on mutual recognition of activities on the territory of Transnistria and Moldova
documents issued by the competent authorities of the Parties (2001, May 16).
Протокол о взаимном признании действия на территории Приднестровья и
Республики Молдова документов, выдаваемых компетентными органами Сторон.
Retrieved from http://mfa-pmr.org/ru/JNc

South Ossetian State Budget for 2016 (2015, December 24). Закон «О Государственном
бюджете Республики Южная Осетия на 2016 год». Retrieved from
http://south-ossetia.info/postanovlenie-parlamenta-respubliki-yuzhnaya-osetiya-o-zako
ne-respubliki-yuzhnaya-osetiya-o-gosudarstvennom-byudzhete-respubliki-yuzhnaya-os
etiya-na-2016-god/

Supreme Council of the Abkhaz ASSR (1990, August 25). Декларация О государственном
суверенитете Абхазской ССР [Declaration on the State Sovereignty of the Abkhaz
SSR]. Retrieved from http://www.apsuara.ru/portal/book/export/html/1013

Supreme Court of Canada (1998). Reference re Secession of Quebec, 2 S.C.R 217. Retrieved
from https://scc-csc.lexum.com/scc-csc/scc-csc/en/item/1643/index.do

The law on voting (referendum) (1996, March 8). Закон о всенародном голосовании
(референдуме). Retrieved from
http://presidentofabkhazia.org/doc/const/?PAGEN_1=5

UNGA Doc. A/RES/2625(XXV), (1970, October 24) *Declaration on Principles of
International Law concerning Friendly Relations and Cooperation among States in
accordance with the Charter of the United Nation*. Retrieved from
http://www.refworld.org/docid/3dda1f104.html

UNGA Doc. A/RES/1514(XV) (1960, December 14). *Declaration on the Granting of*

Independence to Colonial Countries and Peoples. Retrieved from
http://www.un.org/ga/search/view_doc.asp?symbol=A/RES/1514(XV)

Other Documents

1tv.ru (2006, January 23). В Абхазии начали выдавать первые собственные паспорта [Abkhazia begins issuing its first passports]. Retrieved from
http://www.1tv.ru/news/2006-01-23/225258-v_abhazii_nachali_vydavat_pervye_sobstvennye_pasporta

Anderson, B. (1991). *Imagined Communities: Reflections on the Origin and Spread of Nationalism* (Rev ed.). New York: Verso.

Artman, V. M. (2014, March 14). Annexation by passport. *AlJazeera*. Retrieved from
http://america.aljazeera.com/opinions/2014/3/ukraine-russia-crimeapassportizationcitizenship.html

Artman, V. M. (2013). Documenting Territory: Passportisation, Territory, and Exception in Abkhazia and South Ossetia. *Geopolitics, 18*(3), 682-704. DOI: 10.1080/14650045.2013.769963

Avidzba, B. (2017, April 20). Кове: соглашение о двойном гражданстве с Россией поступит в Парламент [Cove: the agreement on dual citizenship with Russia will be discussed in Parliament]. *Sputnik*. Retrieved from http://sptnkne.ws/ezar

Begunov, V. (2016, March 23). Из Сирии с надеждой. Три истории репатриантов [From Syria with hope. Three stories of returnees]. *Sputnik*. Retrieved from
http://sptnkne.ws/ezg5

Begunov, V. (2016, June 9). Выдача паспортов в Абхазии пройдет без дополнительных трат бюджета [The issue of passports in Abkhazia will pass without additional spending of the budget]. *Sputnik*. Retrieved from http://sptnkne.ws/ezgB

Blatter, J., Erdmann, S. and Schwanke, K. (2009). Acceptance of Dual Citizenship: Empirical Data and Political Contexts. *Working Paper Series Glocal Governance and Democracy, University of Luzern*. Retrieved from

Blatter, J. (2011). Dual citizenship and theories of democracy. *Citizenship Studies, 15*(6–7), 769–798.

Bloemraad, I., Korteweg, A., and Yurdakul, G. (2008). Citizenship and Immigration: Multiculturalism, Assimilation, and Challenges to the Nation-State. *Annual Review of Sociology, 34*, 153-179.

Bobick, M. S. (2012). *Performative Sovereignty: State formation in the Transnistrian Moldovan Republic*. Doctoral Dissertation, Cornell University, USA.

Boll, A. M. (2007). *Multiple nationality and International Law*. The Netherlands: Martinus Nijhoff Publishers.

Caspersen, N. (2012). *Unrecognized States*. Polity Press: Cambridge.

Clogg R. (2008). The Politics of Identity in Post-Soviet Abkhazia: Managing Diversity and Unresolved Conflict, *Nationalities Papers, 36*(2), 305-329. DOI: 10.1080/00905990801934371

Coppieters, B. (1999). The roots of the Conflict. *Accord 7*, 14-19.

Cucuberia, A. (2009). Парламент Абхазии отменил поправки в закон о гражданстве [Parliament of Abkhazia abolished amendments to the law on citizenship]. *Kavkazsky Uzel*. Retrieved from http://www.kavkaz-uzel.eu/articles/157569/

Dahlin, E. C. & Hironaka, A. (2008) Citizenship Beyond Borders: A Cross-National Study of Dual Citizenship. *Sociological Inquiry, 78*(1), 54–73.

Dubrovin, D. (2013, November 12). Рогозин: договор об ассоциации Молдавии с ЕС приведет к экономической блокаде Приднестровья [Rogozin: the Moldova-EU Association Agreement will lead to an economic blockade of Transnistria]. *TASS*. Retrieved from http://tass.ru/blizhnee-zarubezhe/745383/amp

EA Daily (2016, May 10). В Абхазии возобновят выдачу российских паспортов [The issue of Russian passports will be resumed in Abkhazia]. Retrieved from https://eadaily.com/ru/news/2016/05/10/v-abhazii-vozobnovyat-vydachu-rossiyskih-pasportov

EUDO (n.d.). *Citizenship or Nationality?* Retrieved from http://eudo-citizenship.eu/databases/citizenship-glossary/terminology

European Court of Human Rights (2009). *Independent International Fact-Finding Mission on the Conflict in Georgia*. Retrieved from http://echr.coe.int/Documents/HUDOC_38263_08_Annexes_ENG.pdf

Famagusta Gazette (2011, February 14). "Turkish Cypriots are citizens of the Republic of Cyprus" - President. Retrieved from http://famagusta-gazette.com/turkish-cypriots-are-citizens-of-the-republic-of-cyprus-president-p11218-69.htm

Francis. C. (2011). *Conflict resolution and status; The case of Georgia and Abkhazia (1989-2008)*. Belgium: Brussels University Press.

Frear, T. (2014) The foreign policy options of a small unrecognised state: the case of Abkhazia. *Caucasus Survey, 1*(2), 83-107. DOI: 10.1080/23761199.2014.11417293

Gerber, A. (2016, November 20). Student rails against 'stateless' ID. *Taipei Times*. Retrieved from http://www.taipeitimes.com/News/front/archives/2016/11/20/2003659621

Giotes, A. (2013, September 10). Ленингорский район: проблемы и их решение [Leningor district: problems and solutions]. *Ujnaya Ossetia*. Retrieved from http://ugo-osetia.ru/index.php/society/item/1706-leningorskiy-rayon-problemyi-i-ih-reshenie

Glazer, N. (2010). Dual Nationality: Threat to National Identity, or Harbinger of a Better World. *Procedia Social and Behavioral Sciences, 2*, 6813–6821.

Government of Transnistria (2016, May 13). *Краткие предварительные итоги переписи населения Приднестровья 2015 года* [Short preliminary results of the Transnistrian population census of 2015]. Retrieved from http://gov-pmr.org/item/6831

Grossman, A. (2001). Nationality and the unrecognised state. *International and Comparative Law Quarterly, 50*(4), 849-876.

Hailbronner, K. (2003). Introduction: The trend towards dual nationality. In D. A. Martin and K. Hailibronner (Eds.), *Rights and duties of dual nationals* (pp. 19-26). The Netherlands: Kluwer Law International.

Howard, M. M. (2005). Variation in dual citizenship policies in the countries of the EU. *IMR, 39*(3), 697-720.

Howard, M. M. (2006). Comparative Citizenship: An Agenda for Cross-National Research. *Comparative Citizenship, 4*(3), 443-455.

International Crisis Group (2013). *Abkhazia: The Long Road to Reconciliation: Europe Report No. 224*. Retrieved from https://www.crisisgroup.org/europe-central-asia/caucasus/abkhazia-georgia/abkhazia-long-road-reconciliation

International Crisis Group (2006). *Abkhazia Today: Europe Report No. 176*. Retrieved from https://www.files.ethz.ch/isn/23764/176_abkhazia_today.pdf

Jafarova, E. (2015). *Conflict resolution in South Caucasus*. Lexington Books: Lanham.

Kalandia, B. (2015, November 7). *Zurab Erk'vania– evropast'an viza-liberalizats'ia, pasportizats'ia da ukontrolo teritoriebi* [Zurab Erkvani - Visa liberalization with Europe, passportization and uncontrollable territories]. *Timer*. Retrieved from http://www.timer.ge/zurab-erqvania-evropasthan-viza-liberalizacia-pasportizacia-da-ukontrolo-teritoriebi/

Khashig, I. (2002, June 27). Abkhaz Rush for Russian Passports: Tbilis's relations with Moscow worsen as hundreds of thousands of Abkhazians take up Russian citizenship. *Institute for War & Peace Reporting*. https://iwpr.net/global-voices/abkhaz-rush-russian-passports

Khashig, I. (2005, November 10). Abkhazia Offers Citizenship to Diaspora. *Institute for War and Peace Reporting*. Retrieved from https://iwpr.net/global-voices/abkhazia-offers-citizenship-diaspora

Kobrinskaya, I. (2008, May). *"Unrecognized States" in Russia's Domestic and Foreign Policy*. *PONARS Eurasia Memo No. 10*. Retrieved from http://www.ponarseurasia.org/sites/default/files/policy-memos-pdf/pepm_010.pdf

Kolstø, P. (2006). The Sustainability and Future of Unrecognized Quasi-States. *Journal of Peace Research, 43*, 723-740. DOI: 10.1177/0022343306068102

Krasniqi, G. (2010). The Challenge of Building an Independent Citizenship Regime in a Partially Recognised State: The Case of Kosovo. *CITSEE Working Paper Series 4*.

Lenta.ru (2010, July 31). Абхазия наладила выдачу собственных загранпаспортов [Abkhazia begins issuing of its own external passports]. Retrieved from https://lenta.ru/news/2010/07/30/passports/

Littlefield S. (2009). Citizenship, Identity and Foreign Policy: The Contradictions and Consequences of Russia's Passport Distribution in the Separatist Regions of Georgia. *Europe-Asia Studies, 61*(8), 1461-1482. DOI: 10.1080/09668130903134848

Lynch, D. (2004). *Engaging Eurasia's separatist states*. Washington: United States Institute of Peace.

Malaev, M. (2017, Feb 20). Какой статус имеют паспорта Приднестровья, Абхазии и Южной Осетии [What status do passports of Transnistria, Abkhazia and South Ossetia have?]. *Kommersant.ru*. Retrieved from http://www.kommersant.ru/doc/3224414

Marshall, T. H. (1950). *Citizenship and Social Class*. London: Cambridge University Press.

Martin, D. A. (2003). Introduction: The trend towards dual nationality. In D. A. Martin and K. Hailbronner (Eds.), *Rights and duties of dual nationals* (pp. 3-18). The Netherlands: Kluwer Law International.

Meckstroth, T. W. (1975). "Most Different Systems" and "Most Similar Systems": A Study in the Logic of Comparative Inquiry. *Comparative Political Studies, 8*(2), 132-157.

Mühlfried, F. (2010). Citizenship at War: Passports and nationality in the 2008 Russian-Georgian conflict. *Anthropology Today, 26*(2), 8-13.

Naseleniye Abkhazii (n.d.) [Population of Abkhazia]. Retrieved from http://www.ethno-kavkaz.narod.ru/rnabkhazia.html

Oeter, S. (2012). Self-Determination. In: B. Simma *et al.* (Eds.), *The Charter of the United Nations: A Commentary*. Oxford University Press, (pp. 313-334).

OSCE (1994). *Transdniestrian Conflict; Origins and Main Issues*. Retrieved from http://www.osce.org/moldova/42308

Parliament of RA (2014). *Заявление депутата Парламента Республики Абхазия Аслана Кобахия* [Statement by the Deputy of the Parliament of the Republic of Abkhazia Aslan Kobakhia]. Retrieved from http://parlamentra.org/rus/news/detail/detail.php?ELEMENT_ID=978

PMR Ministry of Finance (n.d.). *Информация о расходовании гуманитарной помощи Российской Федерации в 2015 году* [Information on the expenditure of humanitarian assistance of the Russian Federation in 2015]. Retrieved from

http://www.minfin-pmr.org/otchety-ministerstva/1075-informatsiya-o-raskhodovanii-gumanitarnoj-pomoshchi-rossijskoj-federatsii-v-2015-godu

Pogonyi, S. (2011). Dual citizenship and sovereignty. *Nationalities Papers, 39*(5), 685-704. DOI: 10.1080/00905992.2011.599377

Riegl, M. (2014). Prospects and limits of economic development of unrecognized states: between organized hypocracy and private interests. *European Scientific Journal, 10*(4), 17-35.

RT (2017, February 20). Moscow's recognition of Donetsk, Lugansk passports doesn't contradict international law – Kremlin. Retrieved from https://on.rt.com/83ow

Russian Public Opinion Research Center (2016). *Пресс-выпуск № 3130* [Press Release No. 3130]. Retrieved from https://wciom.ru/index.php?id=236&uid=115738

Ryumin, A (2017). Россия занялась упрощением получения гражданства РФ жителями Приднестровья [Russia began to simplify the acquisition of Russian citizenship for Transnistrian residents]. *Interfax*. Retrieved from http://www.interfax.ru/russia/549892

Sejersen, T. B. (2008). "I Vow to Thee My Countries": The Expansion of Dual Citizenship in the 21st Century. *International Migration Review, 42*(3), 523-549.

Sercrieru, S. (2015). The two big factors that could shift the status quo on Transnistria. *Russia Direct*. Retrieved from http://www.russia-direct.org/opinion/two-big-factors-could-shift-status-quo-transnistria

Shushkina, A. (2017, March 16). Законопроект, упрощающий получение гражданства РФ для носителей русского языка, рекомендован к принятию в первом чтении [A bill simplifying the acquisition of Russian citizenship for native speakers has been recommended for adoption in the first reading]. *Parliment Newspaper*. Retrieved from https://www.pnp.ru/politics/2017/03/16/zakonoproekt-uproshhayushhiy-poluchenie-grazhdanstva-rf-dlya-nositeley-russkogo-yazyka-rekomendovan-k-prinyatiyu-v-pervom-chtenii.html

Solonari, V. (2003). Creating a "People": A Case Study in Post-Soviet History-Writing. *Kritika: Explorations in Russian and Eurasian History, 4*(2), 411-438.

South Ossetia Today (2016, August 12). Леонид Тибилов: «Наша республика находится в преддверии серьезного политического мероприятия» [Leonid Tibilov: "Our republic is on the eve of a serious political event"]. Retrieved from http://south-ossetia.info/leonid-tibilov-nasha-respublika-naxoditsya-v-preddverii-sereznogo-politicheskogo-meropriyatiya/

Sputnik (2016, June 10). Абхазский паспорт: старый и новый [Abkhazian passport: old and new]. Retrieved from http://sptnkne.ws/cuyW

Jopua, R. (2017, March 30). Форму "паспорта" для неграждан Абхазии утвердил Кабмин республики [The form of the "passport" for non-citizens of Abkhazia was approved by the Cabinet of the Republic]. *Sputnik*. Retrieved from http://sptnkne.ws/ezhk

Supreme Council of the PMR (n.d.). *History*. Retrieved from
    http://www.vspmr.org/about/history/

Supreme Council of the PMR (2017, April 10). *Russian law "On Citizenship": our proposals*.
    Retrieved from
    http://en.vspmr.org/news/supreme-council/rossiyskiy-zakon-o-grajdanstve-nashi-predlo
    jeniya.html

Toal, G. & O'Loughlin, J. (2014, March 20). How people in South Ossetia, Abkhazia and
    Transnistria feel about annexation by Russia. *The Washington Post*. Retrieved from
    http://wapo.st/1ijx3aY?tid=ss_tw&utm_term=.a2561d7368b6

Tynyaev, I. (2017, March 9) . Перепись населения ПМР [Population census of PMR].
    Pridnestrovia. Retrieved from http://newspmr.com/novosti-pmr/obshhestvo/15927

Wallbott, T. (2014). Citizenship and immigration in Western Europe: National trajectories
    under postnational conditions? A qualitative comparative analysis of selected countries.
    MMG Working Paper 14-12.

UN DESA (2013). *International Migration Policies; Government Views and Priorities*.
    Retrieved from
    http://www.un.org/en/development/desa/population/publications/pdf/policy/Internation
    alMigrationPolicies2013/Report PDFs/z_International Migration Policies Full
    Report.pdf