

# **Dual Citizenship and Quasi-Citizenship Policies of Emigration States: Comparative Case of Turkey and Mexico**

**RUSEN YASAR**

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# **Dual Citizenship and Quasi-Citizenship Policies of Emigration States: Comparative Case of Turkey and Mexico\***

Rusen Yasar<sup>†</sup>

## **ABSTRACT**

Migration and citizenship policies of emigration states have recently received increasing scholarly interest. Especially the studies on Mexican migrants in the USA advanced this line of research. The case of Turkish migrants in Europe in general and in Germany in particular display remarkable similarities to the Mexican-American case, and deserves a closer attention. However, Mexican policies have been less permissive to dual citizenship than American policies, and Turkish policies have been more permissive than German policies. The resulting equilibria in two cases have taken different forms: acceptance of dual citizenship with limited transmission in the case of Mexico, and the invention of a status of quasi-citizenship in the case of Turkey. Drawing on secondary research, the first purpose of this paper is to describe Turkish case as one of emigration state by way of highlighting its similarities with Mexico. Second, different outcomes of citizenship regime will be explained by analysing the evolution of the policies of these two sending states towards emigrants.

## **I. Introduction**

### **A. Review of the Background Literature**

Recent decades have witnessed a renewed interest in the concept of citizenship due to changing political reality and discourse, and an extended analytical focus involving its multiple components or dimensions such as status, rights and identity (Joppke, 2007a; Kymlicka and Norman, 2000, 1994). However, a unified conception of national citizenship is difficult to maintain in the face of globalising forces, inability to define a coherent political community, weakening relevance of territoriality, etc.; and scholarly attention should be paid to the disarticulation and rearticulation of its components (Benhabib, 2007; Cohen, 1999; Ong, 2006; Spiro, 2008). For instance, Rogers Brubaker's (Brubaker, 1994) status-based approach understands citizenship as membership in a state, both an instrument and the object of closure that creates boundaries between people based on the idea of nationhood. Yet the nation state is

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<sup>†</sup> PhD Candidate at the Department of Politics and International Studies, University of Cambridge. Email: ry237@cam.ac.uk.

under severe pressure, and national citizenship is not immune to its transformation (Sassen, 2006).

The idea that citizenship is being decoupled from its national character leads to a post-national conception of citizenship linked to universal personhood (Soysal, 1994) for which the differences between the rights of nationals and non-citizen residents are disappearing. Nonetheless, adopting T. H. Marshall's (Marshall, 1965) framework of three generations of rights, political rights are still strongly tied to national citizenship while civil and social rights can be more easily possessed through residence – a central issue of criticism for the citizenship policies of liberal states from normative perspectives (Bosniak, 2006; Carens, 1987; Shachar and Hirschl, 2007). Therefore, even in the dimension of rights only, a partial rearticulation of components of citizenship can be observed for non-citizens.

Evidently, one of the most important factors for this phenomenon is transnational migration, and the sovereign power of liberal states on and their responses to immigration between values and political constraints, which shape the patterns of integration/exclusion through citizenship (Joppke, 2010, 2007b, 2005, 1999). Transnational migration challenges the congruence between geographic and social/political spaces that made nation-building and national citizenship possible (Pries, 2000; Smith and Guarnizo, 1998). Immigrants or trans-migrants 'build social fields that link together their country of origin and their country of settlement' (Schiller et al., 1995, 1992), and the implication for citizenship practices is 'overlapping memberships between territorially separated and independent polities', which create sites through which formally separate polities are becoming more and more interconnected and necessarily interactive, i.e. citizenship constellations (Bauböck, 2010, 2003).

In this context, the study of citizenship has to deal with a tripartite relationship between immigration state, emigration state, and migrants, which is not necessarily institutionalised through full citizenship. For instance, although plural citizenship has become increasingly widespread and acceptable (Martin, 2003; Pogonyi, 2011; Spiro, 2007), the use of political rights for home country politics is problematic in practical and normative terms (López-Guerra, 2005; Nohlen and Grotz, 2007; Rubio-Marín, 2006). Therefore, it is very likely that migrants stand in a relationship of 'quasi-citizenship' with either immigration or emigration states or both, culminating the components of conventional citizenship only partially.

As emigration state policies towards migrants have gained visibility later than immigration state policies, they received relatively less scholarly attention. For instance, the term 'denizenship', proposed by Thomas Hammar (Hammar, 1990) has long been used to denote the status of non-citizen legal permanent residents. For this reason, the investigation of quasi-citizenship in this paper will focus on the relationships between emigration states and migrants. Most of the work in this subject is concerned with

emigrants of Latin American and especially Mexican origin living in the United States (Fitzgerald, 2009, 2006a, 2006b; Goldring, 2002; Itzigsohn, 2000; Jones-Correa, 2001). Thereby, the study of emigration state policies in another context will be a good contribution to this literature, for which Turkish emigrants in Europe and especially in Germany constitute an important case.

## **B. Presentation of the Paper**

With regard to the Turkish emigrants, Østergaard-Nielsen's works (Østergaard-Nielsen, 2003a, 2003b, 2003c) not only compile a large array of case studies, but also include a pioneering study of Turkish state's reaching out efforts towards emigrants. Furthering this line of research, the major aim of this paper will be focusing on citizenship policies in Turkey conceived as an emigration state, which has not received due attention. This will be based on secondary research and utilize existing works on citizenship policies in Turkey and Turkish migration to Germany in order to further the description of the Turkish case as one of emigration state by way of comparison with Mexico, and highlight the prevalence of the aspect of citizenship in this respect.

The central strategy will be identifying major characteristics of emigration states for which the Mexican case will be taken as an established example, and describing the Turkish case on this basis. Showing the similarities between Turkey and Mexico will thus justify the compatibility of the former with the label 'emigration state' and the comparability between the two at the same time. Thereby, alongside descriptive purposes, the comparative study will try to explain the specificities of the Turkish case. In particular, citizenship policies of both states have resulted in an equilibrium between single and dual citizenship in different forms. While Mexican policies are inclined to pull the equilibrium towards single citizenship through limitations on transmission, Turkish policies pushed the equilibrium towards dual citizenship through the invention of a quasi-citizenship. To explain this difference, it will be argued that the decisive aspect that determines the form or degree of quasi-citizenship is the reciprocal preferences of emigration and immigration states for single or dual citizenship, which shape the evolution of already existing home-country citizenship regimes.

To specify, the configuration of four types of factors will be put forward as the determinant of the resulting equilibria. First, the historical experience of emigration states with migration as a desirable or undesirable development shapes the restrictive or permissive tendency towards the citizenship of emigrants. Second, whether political or economic contributions that the emigrants could make are valued more by the home state influences the degree of promotion of dual citizenship. Third, the asymmetry set by the receiving state limits possible actions that could be taken by the sending state. Fourth, a radical transformation of already existing citizenship regimes is difficult, and the adaptation to changing conditions must be compatible with them.

Following this line of thinking, it can be briefly noted that, in the Mexican case, the legacy of negative views on emigrants, lower relevance of citizenship for economic

contributions and the strength of territorial conception of citizenship lead to a suspicious attitude towards external citizenship which had to be limited vis-à-vis liberal American regime. In the Turkish case, the perception of emigration as positive or neutral, higher relevance of citizenship for political contributions and the strength of ethno-cultural conception of citizenship lead to the promotion of dual citizenship for which alternative strategies needed to be developed vis-à-vis German insistence on single citizenship. In what follows, after a brief outline of the comparative logic, these aspects will be presented in context, and the explanatory argument will be built upon them.

## **II. Comparative Framework**

The comparative approach adopted here draws in a conventional manner on J. S. Mill's (Mill, 1973) method of difference, also known as most similar systems design relying on a quasi-experimental environment (Przeworski and Teune, 1970). Accordingly, by taking cases similar in as many aspects as possible, the aim of this comparison is to virtually develop a framework of control, i.e. isolating the explanatory and explained variables by matching a great number of other potential factors, hence assuming them constant (Lijphart, 1971; Sartori, 1991). The comparability of cases can also be established between those belonging to the same category, and categories are defined by the characteristics attributed to them (Sartori, 1970). Based on the idea that comparability and classification are parallel, comparing Turkey with Mexico taken as an ideal-typical illustration of emigration state will also suit the aim of presenting the Turkish case as one of emigration citizenship policies. In other words, the comparative framework adopted here serves the purpose of both description and explanation.

Although description through comparison is not problematic methodologically, one major problem with the use of comparative method of most similar systems for explanation is the question as to whether similar enough cases can be found and explanatory variables can be isolated realistically, which J. S. Mill also drew attention to. In addition, the reliance on deterministic relations and the existence of one cause without interaction effects as well the difficulty of generalising findings are among the main problems with small-N comparative method (Lieberson, 1991; MacIntyre, 1971). As it is clear from the main argument outlined above, the following discussion will try to offer an explanation as complex as possible, putting forward multiple sources of explanation and logical interlinks between them. Yet the internal and external validity of findings must be considered in the light of the problems inherent to comparative method. For internal validity, arguments proposed here must be taken as indicative and open to further empirical scrutiny, and for external validity, their scope of applicability must be taken with respect to the definition of emigration state adopted below.

## **III. Potential Factors Influencing Emigration State Policies**

The category of 'emigration states' could be conceived as part of diaspora relations (Bauböck and Faist, 2010; Østergaard-Nielsen, 2003a) which would include ancient

spreading of people from a homeland (e.g. Jewish communities around the world), legacy of colonial empires (e.g. Indian community in the UK), result of historical tragedies (e.g. Armenian communities in Western Europe and American), or old migration flows (e.g. Italian community in the US). Providing an account relevant to this broad range of phenomena is beyond the scope of this paper. In order to narrow down the issue, emigration states will be understood here as those with a more recent experience of migration with continuing official ties with migrants, and the reference period will be taken as the twentieth century. Another defining characteristic will be emigration in the form of labour export from peripheral (low or middle income) countries to advanced industrial countries.

With regard to this category, the factors proposed for understanding emigration state policies are centred around domestic politics of the home country, its position within the global system and international politics, and the situation of migrants in their country of residence country (Itzigsohn, 2000; Smith, 2003). Moreover, different reasons that create incentives for emigration states to reach out emigrants are relevant (Østergaard-Nielsen, 2003d), the actorness of emigrants must be recognised, and the interactive nature of these relations must be emphasised (Barry, 2006). Thereby, these aspects will be integrated into the descriptive account along the dimensions of domestic conditions during emigration, incentives to reach out emigrants, situation of emigrants in their countries of residence, and the policies of emigration states oriented towards emigrants with an emphasis on citizenship.

## **A. Domestic Conditions during Emigration**

### *i. Demographic Pressures*

As emigration naturally has implications for demographic conditions; it would be undesirable for an under-populated country but desirable for an over-populated country. Although emigration from Mexico dates back to the nineteenth century, for the purposes of this paper the starting point can be taken as the US Emergency Quota Act of 1921 which exempted Mexicans (indeed Latin Americans) from introduced restrictions as a sign of active migration becoming an important policy issue. In early twentieth century, Mexico was an under-populated country, and for this reason, the government sought to prevent outflow of population roughly until 1940s (Fitzgerald, 2009, 2006a). Such attempts largely failed due to the lack of control over borders on the part of Mexico and the welcoming of the crossers by the US.

In the following decades, population growth in Mexico made emigration a viable option for demographic management. Coinciding with the labour shortage in the US due to the Second World War, Mexico had the negotiating power on emigration through bilateral agreements, and had the ability to control emigration by choosing those who would emigrate within this framework. The resulting Bracero Programme was based on the idea that immigration would supply temporary workers who would eventually return. Family members were not allowed for this reason, and other incentives were used such

as holding 10% of salaries to be paid upon return. This programme ended in mid-1960s as a result of the US's ceased need for labour and unwillingness, and the plans for return did not materialise as expected since illegal or uncontrolled migration had always been in place before and during the implementation of this programme. Overall, the difficulty of controlling such flows by the US created for Mexico a great flexibility to leave the burden of restrictions on the US, hence the option of following the 'policy of not having a policy' (Martinez-Saldana, 2003).

Demographic management was also an important part of the Turkish migration policies broadly, but emigration was not a problem that infringes with under-population. Turkey also suffered from under-population in the early twentieth century, due to wars that lasted more than a decade<sup>1</sup>, and the exigence of demographic management is reflected in the welcoming policies toward immigrants from former territories of the Ottoman Empire (Aybay, 2004). Meanwhile, freedom of travel was also legally restricted until 1961, but there was no need for serious measures to prevent emigration since there were no easily reachable attractive destinations among bordering or nearby countries.

Turkey's history of emigration starts directly with intergovernmental agreements with Germany (Abadan-Unat, 2011, 2002). Although emigration was initially planned to be temporary and both states were seeing benefits in this, 'guest workers' (*Gastarbeiter*) turned out to be permanent residents and prepared the basis for further migration through family unification which was not allowed in the first place. Both governments gradually accepted the fact that those migrants were not going back, and when bilateral agreements ended as Germany sought to stop the inflow of migrants and encourage return due to 1973 Oil Crisis and ensuing stagflation and unemployment, Turkish government shifted to passive policies while German government increased restrictive measures. Illegal or uncontrolled migration also became an option, by going to Germany as tourists and settling there, usually with the help of relatives or acquaintances who had already migrated.

#### *ii. Economic Pressures*

As the above discussion shows, economic concerns are an important part of the immigration state attitude towards immigration. The same should also be true for emigration states. Above all, labour shortage and unemployment are corollary to under-population and over-population. Thereby, sustaining an appropriate level of labour force for the national economy could become a substantial reason for attempts to restrict emigration, while the presence of excess labour force makes its export more beneficial through promotion of emigration. Whereas Mexico experienced both situations, Turkish case falls rather in the second category.

More important is the links between emigration and economic policies. In this respect, the adoption of import substitution industrialisation (ISI) by Mexico as the development strategy was closely related to emigration (Canales, 2003). First, this strategy was partly responsible for the problem of not being able to create sufficient employment

opportunities (Alba, 1978). Moreover, the basic logic being the construction of domestic industries which would produce goods that are normally imported, the orientation of ISI towards a protected internal market and reliance on the ability to import capital and intermediary goods entailed severe trade deficits (Hirschman, 1968). Thus, additional sources of foreign exchange inflow were needed and emigration could be seen as a channel of 'migradollars' in this regard. Overall, although emigration could not solve the employment problem by itself, it was a temporary measure to mitigate its effects, and remittances were much appreciated.

Turkey also adopted ISI as a development strategy (Barkey, 1990). Interestingly, the beginning of this type of economic policies coincides with controlled emigration in 1960s, similarly to Mexico where they both began in 1940s. Accordingly, three major aims of the Turkish authorities in deciding to allow, encourage and organise migration were reducing unemployment, expanding foreign exchange reserves and upgrading human capital (Sayari, 1986), in line with ISI objectives. As it is the case with Mexico, the expectations about returning emigrants were largely disappointed, and hence the objective of human capital upgrade was not met through emigration. Yet, it was a positive contribution to the economic policies in reducing unemployment at least temporarily and increasing foreign exchange reserves.

### *iii. Political Pressures*

Domestic political situation, especially the democratic quality and stability of the regime, can also be seen as related to emigration policies. For instance in the Mexican case, undemocratic character of the regime and the inability to reform the system can be considered among the factors that prevent the development of successful migration policies (Martinez-Saldana, 2003). Moreover, politically motivated emigration by dissidents became an additional layer. In the Mexican case, while opposition from abroad was seen as a serious threat early in the twentieth century before the consolidation of the regime, later emigration as an exit option was perceived as contributing to the political stability (Fitzgerald, 2009, 2006a).

Turkey differs from Mexico in that the single party rule established in Turkey in 1920s did not last as long as PRI's monopoly in Mexico, and emigration took place mostly in multi-party environments. However, it is difficult to consider Turkey as a democracy of high standards because of interruptions with military interventions throughout the second half of the twentieth century. For this reason, Turkey can be conceived as a partial democracy, with regime consolidation spread over decades. In this context, asylum seeking in Germany became common during the political turmoil of 1970s and especially following the military intervention of 1980. Not only the movement of opposition abroad became part of the emigration flows, but also this gave the military regime the option to relieve political pressures by depriving fleeing dissidents of their citizenship (Kadirbeyoglu, 2007).

## **B. Incentives for Reaching Out Emigrants**

### *i. Economic Benefits*

Once a significant number of people emigrate, the country of origin faces a completely new challenge. The option of ignoring them usually does not happen, and sending states try to develop specific policies to reach out emigrants for several reasons including securing economic resources, mobilising political support and providing protection and upward social mobility (Østergaard-Nielsen, 2003d). The last aspect may be either genuinely benevolent as expected from a state towards its citizens, or a way of enhancing economic and political benefits.

As it is evident from the above discussion, the most important form of economic benefits that sending countries expect from emigrants are remittances, and their importance were not limited to the ISI period since current account deficits have continued to be a serious challenge. In this respect, the role of remittances in the Mexican economy has been remarkable up until today. For instance, according estimates made in 1996, the inflow of \$ 2 billion corresponds to 3% of GDP and 10% of total output (Durand et al., 1996), and this has continued to be the case until recently<sup>2</sup>. In Turkey as well, a particular importance was attached to remittances not only during ISI period, but also after the neo-liberalisation of the economy. Yet compared to Mexico, on the one hand, the overall relevance of remittances was lower in Turkey, and on the other hand, their relative significance declined over time<sup>3</sup>.

### *ii. Political Benefits*

Political mobilisation of emigrants in favour of the home country presumes, in the first place, popular influence on the foreign policy of the receiving state by an immigrant-origin group of people, which is quite a delicate situation. Yet an acceptable form of mobilisation is relevant for both Mexican-American and Turkish-German cases with respect to regional integration. For instance, during the formation process of North Atlantic Free Trade Association (NAFTA), an important role was attributed to Mexican emigrants as the Mexican government which was a proponent of the project was seeking to overcome the reluctance of the US government (Goldring, 2002).

The perception of Turkish emigrants in Germany in particular and in Europe in general as a political asset to support Turkey's cause of accession to the EU is quite similar to the Mexican case. The major difference lies, however, in the fact that Mexico was a founding member of NAFTA whereas Turkey is trying to become a member of an organisation existing for decades, but EU is the embodiment of a much more advanced level of regional integration and a stronger political status compared to NAFTA, with higher perceived benefits for Turkey. In this sense, accession to the EU is quite high in Turkish political agenda, and emigrants are potentially a great opportunity to influence the attitude of current members, especially those which are most sceptical about the accession of Turkey such as Germany (Østergaard-Nielsen, 2003c, 2003e).

## C. Features Related to the Situation of Emigrants

### *i. Views on Emigrants in Home Countries*

How emigration states and emigrants view each other is an indicator of the specificities of the relationships between them and reflect major characteristics discussed so far. Not surprisingly, these views can be quite negative especially in terms of social perceptions of cultural aspects (Fitzgerald, 2009). For instance, derogative labels such as *pochos* and *pachucos* are used for Mexican-Americans to refer to their dissimilation from Mexican culture, assimilation to American culture, and indeed a subculture which is neither Mexican nor American. The legacy of Mexican experience with undesired emigration is reflected in such views incorporating the aspect of abandoning the homeland. Yet, in later periods, the promotion of the idea that they support their homeland from abroad improved their image, especially in the official discourse (Martinez-Saldana, 2003). The economic value of Mexican emigrants for Mexico also led to an understanding of cultural loss at the price of economic gains.

In the Turkish case, similar features of contempt exist in society; the term *almanci* usually carries derogative connotations, and the subculture of emigrants are seen as traditional, backward, degenerative, or at best 'in-between' (Kaya, 2005). As different from the perception of Mexican-Americans, neither an element of betrayal is reflected in these views, nor economic contributions of emigrants are taken as the compensation of their cultural 'degeneration'. Instead, the official discourse is mostly concerned with the goal of proving Turkey's Europeanness. In this respect, emigrants are expected to represent the modern and secular Turkey, but the image of them staying traditional upsets such expectations (Østergaard-Nielsen, 2003e). Still, Turkish emigrants in Germany and other countries of the EU display a hyphenated identity that entails identification with Turkey, their country residence and Europe at the same time (Kaya and Kentel, 2005a, 2005b; Kaya, 2005).

### *ii. Emigrants' Views on Home Countries*

As for emigrants' views on the reaching out efforts of the sending states, one must not expect a group of people ready to support their home country politics; emigrant attitudes can become quite critical, and they are usually mixed. Mexican-Americans' feelings for Mexico as a nation are positive, but their attitudes towards Mexican government are generally critical and they have little interest in Mexican politics (Garza and DeSipio, 1998). Accordingly, although they can influence policies concerning Mexico, the basis of their actions will be their interests but not abstract national attachments to the homeland. Therefore, when emigrant support is sought for economic or political goals, either this should fall within an area of overlapping interests between emigrants and the sending state, or the latter should be able to offer something in return (Barry, 2006).

Similarly, Turkish-Germans' views on the Turkish state are mixed and critical attitudes constitute an important part of them. Yet this complicated picture is quite parallel and linked to the domestic situation of Turkey. Turkish emigrant community in Germany is

divided along party-political, religious and ethnic lines (Østergaard-Nielsen, 2003c). Thereby, leftists rather than nationalists, Alevis rather than Sunnis, and Kurds rather than Turks are in a constant position of opposition to the regime in Turkey. Although this displays an interest in Turkish politics, emigrants value their status in Germany and are cautious about not becoming or being perceived as a 'fifth column'. Turkish state must have learnt from its experiences so far that it cannot mobilise emigrants unilaterally without taking into consideration their interests and demands. For instance, Turkish accession to the EU is not only compatible with the hyphenated identity of emigrants, but also serves their interests, and several studies also show that they expressly support this goal (Kaya and Kentel, 2005a, 2005b). This is probably one of the few areas in which Turkey can receive support transcending internal divisions of emigrants.

### *iii. Receiving Country Contexts*

Emigration is the result of an asymmetrical relationship between sending and receiving countries, embodied by the expression 'labour export'. This is also visible in the disposition of the receiving states to try to determine the terms and conditions of migration, for instance, shifting between welcoming and restrictive policies according to domestic economic needs as seen in both American and German cases. However, immigration is not a reversible process, and today, both Mexican-origin immigrants in the US and Turkish-origin immigrants in Germany constitute the most significant migrant communities<sup>4</sup>. Since the societal conditions of receiving countries are reshaped by the presence of immigrants, several aspects of the receiving country politics are of crucial importance for the integration of immigrants, and the US and Germany stand in stark contrast in this regard.

Today, restrictions and control in the US are the illustration of the high point of anti-immigration policies. This may also be accompanied by an anti-immigrant discourse, including but not exclusive to those of Mexican origin. However, the fact that the US is historically an immigration country has created a remarkable legacy of liberal regime. Accordingly, the self-recognition as an immigration country is strongly linked to the civic conception of the nation. Thereby, the citizenship regime has a strong territorial component (*jus soli*), enabling anyone born on the American territory to acquire its citizenship. The liberal character of American citizenship is also visible in its relatively easy naturalisation procedures. Last but not least, despite the virtual incompatibility of citizenship oath, plural citizenship has long been a common feature, since there is no formal requirement of renouncing any existing citizenship (Bloemraad, 2007).

Germany, another country which seeks to prevent immigration at present, is based on a completely different historical legacy. First of all, Germany is infamous with its ethno-cultural conception of nation as a community of descent, reflected in its history of immigration policies (Brubaker, 1994; Koopmans et al., 2005). Looking at its experience with immigration before the post-war era, apart from the movement of

ethnic Germans, policies of imported labour can be seen in the Prussian model with strict regulations of temporary work and mandatory return, and the Nazi model of forced labour (Klusmeyer, 2009). The Federal Republic understandably tried to avoid any comparison with these models, but found it difficult to depart from the basic conception of nationhood and to recognise that it had become an immigration country.

The effects are also visible in the citizenship regime with strong genealogical component (*jus sanguinis*), difficult naturalisation procedures and insistence on single citizenship (Hailbronner, 2010, 2002). Noticeable signs of the recognition of having become an immigration country came later with impacts on the citizenship regime, but the basic rules did not change substantively. Although the introduction of a model of conditional *jus soli* and the facilitation of naturalisation are remarkable developments, insistence on single citizenship continues with the requirements of choosing German citizenship over another or renouncing the previous one. It is in this sense that German citizenship regime can be described as a case of partial liberalisation against the background of a general trend of liberalisation and ensuing acceptance of dual citizenship (Howard, 2009; Weil, 2001).

#### **D. Policies towards Emigrants**

##### *i. Institutionalisation of Relations*

A condition for successful emigration state policies should be having contact points with emigrants, for which migrant organisations are important as well as the efforts of other relevant actors and the construction of structures specifically designed for this task. Migrant organisations of Mexican-Americans are based on the model of hometown associations which had emerged from internal migratory flows of Mexico (Fitzgerald, 2009). Although this model carries the risk of scattered representation, they became important contact points for the government, political parties and the Church, and they displayed the capacity to act politically within the frameworks of both Mexican and American politics. Moreover, the Mexican state created its own structure for addressing issues related to Mexicans: Institute of Mexicans Abroad (*Instituto de los Mexicanos en el Exterior*).

Turkish emigrants also initially organised in associations linked to the locality of origin, but these functioned for the provision of several services, their participation in German social life while preserving cultural identity, but the Turkish state could not make use of them as contact points (Adigüzel, 2009). More importantly, internal divisions of the emigrant community along multiple dimensions have been reflected in their organisational patterns (Østergaard-Nielsen, 2003c). Attempts to form umbrella platforms and a unified political movement to represent the Turkish community as a whole failed. Political parties and religious groups could find corresponding organisations, but reaching the entire community through them was impossible. Turkey also constituted purpose-specific structures, such as the Consultation Council (*Danisma Kurulu*) which channels the representation of emigrants in domestic politics, and more

recently the Secretariat of Turks Abroad and Kin Communities (*Yurtdisi Türkler ve Akaraba Topluluklar Baskanligi*) which also incorporates the Consultation Council. Attempts of more systematic institutionalisation of relations are conducted under this new secretariat<sup>5</sup>.

*ii. Dual and/or quasi-citizenship*

It has been noted earlier that emigration states may seek to provide protection and upward social mobility to the emigrants in their country of residence in addition to expected economic and/or political benefits, and that they can make demands in return for their contributions to the home countries. In this context, enabling emigrants to acquire the citizenship of the receiving state is not only essential for protection and social mobility, as well as for empowerment to have political influence, but also desired by emigrants themselves very probably (Barry, 2006). In addition, accepting dual citizenship in the domestic legal system appears as the most effective strategy for this purpose (Jones-Correa, 2001). As shown below, both Mexico and Turkey have made moves to respond to these demands. For instance, the acceptance of dual citizenship by Mexico is linked to the motive of providing the emigrants with the political means to protect themselves, i.e. with American citizenship, in the face of anti-immigrant legislations such as California Proposition 187 of 1994, Welfare Reform Act and Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (Castañeda, 2004). Turkey accepted dual citizenship as early as 1981, perhaps pre-emptively when it became evident that there would be a significant Turkish population living outside the territory. The continuous tendency to promote the acquisition of German citizenship can also be attributed to the expectation from expatriates to help to transform German politics towards more sympathy for Turkey (Kadirbeyoglu, 2007).

To discuss the citizenship regimes separately, the current version of the constitutional definition of Mexican citizenship is codified in Article 30 in 1997 at the same time with the acceptance of dual citizenship as the following<sup>6</sup>:

- I. Those born on the territory of the Republic, regardless of the nationality of their parents.
- II. Those born abroad, children of Mexican parents born in the national territory, of a Mexican father born in the national territory, or of a Mexican mother born in the national territory.
- III. Those born abroad, children of Mexican parents by naturalisation, of a Mexican father by naturalisation, or of a Mexican mother by naturalisation.
- IV. Those born in Mexican ships or aircraft, merchant or war.

Assuming that potential dual citizens are those who are entitled to a foreign citizenship by virtue of being born on a foreign country, which corresponds to the situation of emigrants in the US, dual citizenship is allowed only to those who emigrated and the first generation born abroad according to this definition. Thereby, Mexican authorities sought to allow dual citizenship but limit unconditional transmission of citizenship to further generations abroad. The previous version was a model of mixed *jus soli* and *sanguinis*, providing the opportunity to become a citizen to anyone born on the territory

and born to Mexican parents regardless of territory (Fitzgerald, 2005; Ramírez Becerra, 2000). Yet this was counterbalanced by the restriction on acquisition of another nationality: any Mexican national who acquired another citizenship would automatically lose Mexican nationality or anyone entitled to another citizenship would have to choose. Despite temporary policies in its history to deny citizenship to certain groups on ethnic bases, it can be safely said that Mexican citizenship displays a civic character based on the constitutional formulation, and especially with respect to the prevailing strength of its territorial component after last amendments.

On the other hand, Turkish citizenship is defined in the Article 66 of the constitution by the statement that 'Everybody linked to the Turkish state with a citizenship bond is Turk', also codifying the birthright acquisition of citizenship through that of parents. Provisions of the Citizenship Law refers to *jus soli* only under special circumstances, and there is no restriction on *jus sanguinis* transmission abroad. Related to the prominence of genealogical aspect, the strength of the ethno-cultural component of Turkish citizenship has been subject to debates (Kasaba, 1997; Kirisci, 2000). While the official position claims that the constitutional formulation is a technical definition of the word 'Turk' charging it with a civic meaning, scholars drew attention to the monolithic character of Turkish citizenship assuming a unique identity, constituted on republican but state-centric premises, and culturally embedded in the national identity (İçduygu et al., 1999; Kadioglu, 2005; Keyman and İçduygu, 2005; Soyarik-Sentürk, 2005). While these aspects have remained more or less static, the major changes to the Turkish citizenship regimes have been realised to address new conditions caused by emigration (Kadirbeyoglu, 2007). Therefore, dual citizenship have been considered as compatible with the general character of the citizenship regimes since emigrant citizenship would imply ties of ethnicity and culture, or 're-ethnicisation' (Joppke, 2003).

Nonetheless, the implementation of dual citizenship would not be effective for emigrants living in Germany because of the latter's insistence on single citizenship regime and renunciation requirement for both birthright acquisition and naturalisation. Before German legislators remedied certain legal loopholes, Turkish authorities utilised them as a back door for German-Turkish dual citizenship. More specifically, when there was no restriction on the acquisition of another citizenship by those who already possess German citizenship, emigrants could become dual citizens by renouncing and re-acquiring Turkish citizenship, for which Turkish authorities were being extremely helpful (Hailbronner, 2010; Rumpf, 2003).

However, in the current context, acquiring German citizenship would mean losing both official ties with Turkey and the rights associated with its citizenship. In order to deal with these disincentives, Turkish authorities invented a status of quasi-citizenship, known as blue (formerly pink) card, offered to those former citizens who renounced Turkish citizenship in order to acquire another one, and covering almost all rights associated with citizenship except the political. This was therefore falling in the sovereign powers of Turkey without any legal infringements with the German regime

(Aybay, 2010). The first formulation in the Citizenship Law created a status that could be transmitted by descent without any limit, which became the object of many criticism (Tarman, 2010). After the ensuing amendments, the current form limits the transmission to the children born before the loss of citizenship. However, blue card has not been as popular as expected among emigrants in Germany, probably showing that the meaning of citizenship is more than the practicalities that this status offer, and for many, single Turkish citizenship seems more valuable than the combination of German citizenship and Turkish quasi-citizenship (Caglar, 2002; Offe, 1999).

### *iii. Incorporation into Home Country Politics*

Finally, migrants can be expected to demand effective political rights to participate in the domestic politics of their home country. This can be seen as a counterpart of the contributions that emigrants make, which is indeed normatively controversial. In addition, the implementation of arrangements necessary for political participation of external citizens has to face serious practical difficulties (Thompson, 2007). Still, external voting immediately followed the acceptance of dual citizenship. Controversies have also been apparent very soon as illustrated by the case of 'Tomato King' who was elected to a local office without being a resident of Mexico (Castañeda, 2004).

A modest version of external voting has been in place in the Turkish electoral system for quite a long time in the form of placing ballot boxes in the border zones during 70 days before elections. In addition to this, Turkish government has been willing to accept voting from abroad and the legal basis for this is ready, but judicial authorities do not allow it for reasons of electoral fairness (Kadirbeyoglu, 2007). Since German government is not willing to cooperate on this issue, making necessary arrangements to ensure the fairness of external voting becomes difficult. Thereby, while Mexico implements external voting and faces its controversies, Turkey wants to implement it but cannot do so by fear of such controversies.

## **IV. Accounting for Similarities and Differences**

### **A. Conceiving the Turkish Case as One of Emigration State Policies**

Taking the Mexican case as an ideal-typical example of emigration state policies, all the similarities that Turkey displays with it can be counted as reasons for conceiving it as another typical emigration state, and as characteristics of it being as typical of emigration state. To summarise them, emigration from Turkey has been an important component of domestic politics including demographic management of population, economic policies of development strategies, and regime consolidation. Here, it is interesting to see that the coincidence of the timing of controlled emigration with that of common development programmes, and the interplay of emigration with partially democratic character and instability of the regime display similar patterns across two parts of the world and across time.

Moreover, the presence of a significant population abroad creates incentives to establish and/or maintain relations with them, and Turkey acted upon these incentives to secure economic and political benefits. Yet the effectiveness of this action depends on the cooperation of emigrants, thus on the extent to which Turkish state focuses on areas of common interests such as accession to the EU. It can be seen as a natural tendency that the assimilation of emigrants into a foreign culture, or their invention of a culture of their own is met with contempt in the society of their home countries, while the reflection of this social disposition on the official discourse is shaped by the value attributed to emigrants. Accordingly, the common sense perceptions of emigrants are the source of a disappointment for Turkish authorities in relation to their European cause.

Receiving state policies are evidently not an integral part of emigration state policies, but they are important in terms of setting the circumstances under which the latter has to act. In addition, Turkish citizenship regime has been put forward as significantly different from the Mexican citizenship regime. However, appropriating the link between these home and receiving country citizenship regimes from the following section, an additional characteristic of emigration states can be described as advancing policies that respond to the circumstances set by the receiving state. Turkey fits into this description by virtue of its practices including the circumvention of German restriction on dual citizenship when this was possible, and the development of an alternative status that reduces the costs of acquiring German citizenship.

## **B. Explaining the Specificities of the Turkish Case**

On the other hand, the above discussion has also drawn attention to several differences between Turkish and Mexican cases, which will form the basis for explaining the specificities of the Turkish case in terms of the quasi-citizenship status as opposed to the movement of the Mexican citizenship regime towards one of dual citizenship with restrictions on transmission. Apart from this distinction, which was defined as the main point of interest of this paper to be explained by the comparative framework, other differences can be summarised as follows: Turkey has a shorter history of emigration with less or no negative experience, political rather than economic motives have become more important for Turkish efforts to reach out emigrants, Turkish citizenship regime is based on a more ethno-cultural conception with stronger *jus sanguinis* rules rather than a civic conception and *jus soli* rules, and German citizenship regime has set a context very unfavourable for dual citizenship in contrast to the liberal American regime.

Accordingly, the configuration of these differences must account for the diverging citizenship regimes, and the most evident and strongest source of explanation appears as receiving country regimes and policies. Thereby, in the first instance, it can be deduced that Mexico sought to limit the transmission of citizenship abroad, together with its acceptance of dual citizenship, since in the context of the liberal American citizenship regime accepting dual citizenship unconditionally would lead to unnecessary expansion

of external citizenship; and Turkey sought to invent a status short of citizenship, because in so far as Germany continues its insistence on single citizenship, this will be the only way of offering the option of keeping some sort of official ties with the Turkish state and rights associated with citizenship, and acquiring German citizenship at the same time to the emigrants.

However, this can hardly be the sole explanatory factor. It is difficult to maintain that Mexico put limitations only to counterbalance the American regime, or that Turkey accepted and promoted dual citizenship with the confidence that Germany would never allow it. Instead, the explanations looked for as to why Mexico has not been enthusiastic about extending the external citizenship to further future generations born abroad as Mexican-origin individuals, and why Turkey has been so enthusiastic about enabling emigrants to acquire German citizenship. As a background for the answers to these questions, the compatibility of potential paths to be followed by sending countries with their existing citizenship regimes is relevant. Mexican regime was quite flexible with almost equal weight of *jus soli* and *sanguinis* components, and a strong civic character, but had a stronger inclination to single citizenship, and the disposition to limit *jus sanguinis* and dual citizenship eventually prevailed. Meanwhile, Turkish regime has already been based on an ethno-cultural conception and *jus sanguinis*, thereby having no trouble with the transmission of citizenship abroad. Still, transmission of quasi-citizenship was limited, probably due to the willingness to prevent its possession by future generations who have no real ties with Turkey, hence a disposition similar to Mexico's.

The remaining two differences can thus explain the (lack of) enthusiasm on the part of Mexico and Turkey for enabling expatriates to acquire the citizenship of their country of residence. First, the legacy of Mexico's negative experience with emigration as an undesirable phenomenon may have left some suspicions about whether emigrants really deserve citizenship, while such an aspect is absent in the Turkish context. Second, economic factors are more prevalent for Mexican policies towards emigrants as compared to Turkish policies for which political factors have become more important, and the relevance of residence country citizenship differs to attain these goals. In fact, economic benefits in the form of remittances are mostly related to family ties on which citizenship would not have an immediate effect. However, political mobilisation in the country of residence presumes the possession of necessary political means, i.e. citizenship, and for this reason, its acquisition is the precondition to support their home country. In other words, the relevance of receiving country citizenship is higher for the goals of political mobilisation than for the goal of securing economic resources through remittances.

To put all of these in a logical structure, the explanation can be summarised as follows: In Mexico, given the general character of the citizenship regime, authorities would opt for either sustaining *jus soli/sanguinis* mix or moving to a stronger *jus soli* system. Although several benefits could be seen in dual citizenship, the choice has been towards

the territorial conception, since expected economic contributions from emigrants did not specifically require citizenship links, and since there was no sufficient reason to consider expatriates as natural and eternal members of the society. Also considering the favourable context provided by the US, accepting dual citizenship would directly be effective and it should be contained. For this reason, the transmission of citizenship abroad is limited through a territorially inclined citizenship regime. In Turkey, it would be difficult to depart from the citizenship regime that favours *jus sanguinis*. Also without much negative image of emigrants, maintaining citizenship ties with them was in conformity with this regime, and dual citizenship was easily acceptable. Moreover, due to the increasing political relevance of emigrants, the acquisition of the citizenship of the country of residence has become essential. Thus, in the face of German reluctance to allow dual citizenship, Turkey sought to enable emigrants to acquire German citizenship while maintaining ties with them through another status.

## **V. Conclusion**

This paper has looked at the phenomenon of migration from the perspective of sending states and tried to incorporate the aspect of citizenship to the analysis of emigration state policies. Put briefly, it addressed the question as to why different citizenship regime outcomes have developed in Mexico-US and Turkey-Germany country constellations and, in particular, how Mexico ended up pulling the equilibrium towards single citizenship while Turkey pushed it towards dual citizenship. In doing so, it proposed to scrutinise demographic, economic and political conditions in sending countries during emigration; economic and political incentives to reach out emigrants once they settle; situation of emigrants with regard to their perception in and views on their home countries and to the receiving country context; and policies of emigration states including the institutionalisation of relations with emigrants, recognition of dual or quasi-citizenship and incorporation of emigrants into home country politics.

Analysing the two empirical constellations along these lines, it has been argued that whereas the attitude of receiving states has a major impact on emerging citizenship regimes, the outcome is better understood as result of a more complex picture also shaped by experiences of migration and internal dynamics of the sending states. This tentative explanation basically relies on the study of Mexican and Turkish cases as emigration states, and thus can be seen as partly speculative. However, there is good reason to believe that it provides fertile ground for the understanding of emigration state policies and citizenship regimes as Mexico constitutes an ideal-typical example of emigration state and Turkey is shown to display important similarities. Therefore, empirical validity and explanatory power of the suggested approach beyond these cases remain to be assessed by further research, and more detailed studies as well as the examination of more cases are likely to be fruitful in this sense.

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**Notes:**

1 Turkish (Ottoman) Armies fought in Libya in 1911, in the Balkans in 1912 and 1913, in the First World War between 1914 and 1918, and in the War of National Independence that followed between 1919 and 1922, resulting in a drastic decline of population.

2 According to World Bank Migration and Remittances Factbook 2008, remittances in the Mexican economy constituted 2.9% of the GDP in 2006. Although this figure fell to 2% in 2011 according to World Bank data, this is still a remarkable share, especially compared to Turkey (see infra note). Data are accessible on the URL: <http://econ.worldbank.org/> (retrieved on 27/05/13)

3 According to World Bank Migration and Remittances Factbook 2008, remittances in the Turkish economy constituted 0.3% of the GDP in 2006. This figure fell almost to 0% in 2011 according to World Bank data. Data are accessible on the URL: <http://econ.worldbank.org/> (retrieved on 27/05/13)

4 According to recent estimates, Mexican immigrant population in the US amounts to 11.5 million, corresponding to 30% of the total foreign-born population, 3.8% of the total US population, and 10.4% of the total population of Mexico, being the largest immigrant group according to the country of origin (Brick et al., 2011). People with current or previous Turkish citizenship living in Germany amount to 2.5 million, corresponding to 15.8% of people with immigrant background, 3.1% of the total German population, and 3.4% of the total population of Turkey, being the largest immigrant group according to the country of origin (DESTATIS, 2012, 2011).

5 For instance, Ostergaard-Nielsen (Østergaard-Nielsen, 2003e) notes the frustration of the NGOs of Turkish emigrants about being bypassed during the nomination of representatives in the Consultation Council. Through personal contact with the officials of the Secretariat, it is revealed that a database of such NGOs was in the process of preparation in 2012.

6 The constitution is officially known as 'Political Constitution of the Mexican United States' (*Constitución Política de los Estados Unidos Mexicanos*). The article is translated by the author from the original text. It should be noted that this constitution differentiates between nationality and citizenship, the former being the fundamental status. To avoid terminological confusion, the fundamental status is referred to as citizenship here.

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