

Plural Citizenship and Quasi-Citizenship in Emigration State Contexts: A Comparative Study of Mexico and Turkey

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Abstract

In two of the busiest migration corridors of the twentieth century, namely Mexico-US and Turkey-Germany, migrants can today be dual citizens. The general trend towards plural citizenship has occurred over a lengthy process which witnessed several forms of legal status short of full citizenship. This paper examines such statuses through the concept of quasi-citizenship as a transitional equilibrium which emerges from an incompatibility between citizenship regimes of sending and receiving states in a given constellation, and argues that their reciprocal preferences for single or dual citizenship explain the form of emerging quasi-citizenship. Although receiving states are economically and politically more powerful, internal dynamics of emigration countries also shape the trajectory of reform toward plural citizenship. A comparison of Mexico and Turkey highlights the factors which lead the former case to pull the equilibrium away from plural citizenship but the latter case to push it towards plural citizenship. The differences in their preferences, trajectories to plural citizenship and forms of quasi-citizenship are explained by the legacy of undesired emigration in Mexico and the relevance of citizenship for the international political benefits that Turkey seeks.

1 Introduction

Transnational migration has been challenging the traditional congruence of political authority, population and territory, and concomitantly a unified conception of citizenship. Immediate implications have been faced by receiving countries with growing numbers of resident aliens, reconsiderations of naturalisation and citizenship acquisition practices, and social and cultural integration, among others.

Meanwhile, emigration entailed several challenges and opportunities for sending states, for which citizenship policies have come to the fore as an important tool to achieve specific aims. As a result, while it is possible to observe a general trend towards the acceptance of plural citizenship on both sides of transnational migration, the reconfiguration of different dimensions of citizenship led to new categories which usually fall short of full citizenship.

This paper examines such categories by conceptualising them as quasi-citizenship: a status which is highly similar to citizenship, but differs from it in at least one crucial aspect. A familiar form of quasi-citizenship corresponds to denizens who enjoy a stable status of residence but not citizenship, whose rights are almost identical to those of citizens, usually with the exception of political participation, and who are not seen as complete strangers, but probably seen as culturally distinct. This paper focuses on the corollary of denizenship for the links with emigration countries, hence emigrant quasi-citizenship, which is a relatively understudied yet crucial aspect of transnational migration. Accordingly, if residence can entitle migrants to certain benefits in receiving countries, absence can also disqualify them from those in sending countries; and if residence is not sufficient for full membership, absence may not be an obstacle to certain privileges.

Quasi-citizenship is a reasonable option when it is either impossible or costly to hold the full citizenship of both sending and receiving states, thus it is likely to emerge when one state party has a more conservative approach to citizenship than the other. Such an asymmetry does not necessarily reflect the asymmetry in economic and political power which underlies transnational migration. In fact, emigration states vary in their approaches as much as their counterparts, and have the potential to shape the overall trajectory of citizenship reform in different directions. This variation is illustrated in the cases of Mexico and Turkey, countries with two of the largest emigration waves of the twentieth century. When the reluctance for plural citizenship occurs on the part of the sending state, such as Mexico for the most of the twentieth century, quasi-citizenship is a tool to pull the regime towards single citizenship; when the reluctance occurs on the part of the receiving state, such as Germany (the main destination of Turkish emigrants) until recently, quasi-citizenship is a tool to promote plural citizenship by other means.

In this respect, it is argued that quasi-citizenship is a transitional equilibrium on the path from single to plural citizenship, emerging from an incompatibility in the regimes of sending and receiving states in a citizenship constellation. Furthermore, the specific form of quasi-citizenship and its timing as a transitional equilibrium are determined by the interplay of reciprocal preferences for single or plural citizenship. Thus, in Mexico, responding to the permissive regime of the US, quasi-citizenship emerged as a status of nationality more restricted than full citizenship. In Turkey, responding to the conservative regime of Germany, quasi-citizenship emerged as a status of privileged aliens for former citizens. A compar-

ison between the two shows that the incentives for pushing or pulling the tendency towards plural citizenship depend on perceptions about emigrants and relevance of citizenship for expected benefits. The following sections will, first, conceptualize quasi-citizenship with regard to the theories of transnationalism and citizenship; second, describe the differences in citizenship constellations of Mexico-US and Turkey-Germany; third, analyse posited explanatory factors in relation to the experience of emigration; and fourth, summarise and discuss the findings.

2 Transnational migration and quasi-citizenship

2.1 Conceptualising quasi-citizenship

According to a unitary conception of citizenship, citizenry would be a group of people living in a well-defined territory as equal members of a political community and subject to the same political authority. However, in the context of transnational migration, such an overlap no longer exists, with the presence of non-citizens in the territory and under the authority of immigration states, and with the absent citizens outside the territory and beyond the reach of the political authority of emigration states. Therefore, transnational citizenship can be understood as resulting from the non-congruence between geographic and social/political spaces that made nation-building and national citizenship possible (Pries, 2000), resulting in ‘overlapping memberships between territorially separated and independent polities’ (Bauböck, 2003, p. 720).

These grey areas constitute the context from which quasi-citizenship emerges. The emergence of a new category less extensive than full citizenship can be explained by the idea that the main components of citizenship have been disarticulated from each other, and partially rearticulated in transnational spaces (Cohen, 1999). These components can be taken in terms of the dimensions of status, rights and identity (Joppke, 2007). The status dimension refers to the expression of legal ties between the individual and the state, thus, both an instrument and the object of closure that creates boundaries between people and allocates them to distinct entities (Brubaker, 1994). Given transnational spaces, the physical distribution of people will not match such a legal allocation. The identity dimension refers to the expression of social ties which may display both civic and cultural components. Yet the cultural dissimilarity created by immigration and cultural similarity that became the primary link with expatriates lead immigration states to de-emphasise and emigration states to re-emphasise ethnic aspects of citizenship (Joppke, 2003).

As for the dimension of rights, this can be further disaggregated into three components, following Marshall (1965): civil, political and social rights. According to several rights-focused theories, national citizenship has become obsolete

since rights are now attached to universal personhood rather than membership in a nation state (Soysal, 1994). Nonetheless, it is difficult to sustain this claim for all generations of rights. While it is true that civil rights are universal, and that social rights are more or less detached from citizenship depending on the welfare system, political rights are still almost exclusively linked to citizenship¹. In this sense, due to the disarticulation and rearticulation of rights, transnational spaces may witness different configurations of rights, and the presence or absence of political rights is usually the crucial feature which demarcates full citizenship from other categories.

In this framework, the content of quasi-citizenship becomes a question of which components of full citizenship are articulated to define new categories of people. At this point it is important to distinguish quasi-citizenship from the 'lightening' of citizenship (Joppke, 2010). Although it comprises of a partial rearticulation of citizenship, it can easily become redundant where full citizenship is available. In this sense, it is a stage between single and plural citizenship regimes, given an overall trend towards the latter which has long been in place (Spiro, 2007). Therefore, quasi-citizenship is understood as a transitional equilibrium when plural citizenship is not available, and it accommodates the conditions of transnational spaces which in fact call for multiple memberships. In other words, quasi-citizenship emerges when there exist forces which decelerate the transition to plural citizenship, and these forces can be observed in diverging preferences of sending and receiving states.

Since sending and receiving states are reciprocal actors with the ultimate power over legislative and administrative decisions, transition to plural citizenship is only effective when both actors are willing to reform their respective regimes in this direction. When there is discrepancy between the two, intermediate forms emerge. Although the state which insists more persistently on single citizenship delays the eventual transition, the system in the other state pushes the equilibrium towards plural citizenship. For example, whereas Mexico was the decisive actor as a sending state in this respect, her sovereignty could not extend as far as compelling the US to deny citizenship to Mexican nationals, or to share the information necessary for Mexico to disqualify those who had been naturalised. Similarly, Germany was the decisive actor, but her sovereignty could not extend as far as preventing Turkey from granting certain privileges to former citizens. The results can be understood as forms of quasi-citizenship, defined by the restrictions that Mexico was willing and able to apply, and by the privileges that Turkey was willing and able to concede.

2.2 Comparative framework

The remainder of this paper will focus on the forms of quasi-citizenship in emigration state contexts as illustrated by the cases of Mexico and Turkey. In fact, their comparison will be based on citizenship constellations in which they take part, since, under conditions of transnational migration, sending-state policies are deeply intertwined with the migrant communities and receiving states (Bauböck, 2010). Not only Mexico and Turkey are significant cases of emigration, which make them suitable for studying sending-state citizenship practices, but also their constellations share important similarities which make them comparable. Namely, both are developing countries, the emigration from which was mainly motivated for employment opportunities and concentrated in a high-income country as destination².

Sending-state policies to reach out to emigrant communities have developed relatively late, as compared to receiving states which had to deal with the immediate consequences of immigration. But recent decades witnessed a considerable diffusion of emigration state policies, especially among Latin American countries which generally follow the Mexican model (Délano, 2014). From a broader perspective, Turkey is one of the most important cases outside Latin America (see, for example, Østergaard-Nielsen, 2003*d,b*). In this respect, thanks to their differences in institutional background and political culture, Mexico and Turkey also provide meaningful variation in citizenship-related outcomes.

These outcomes contain two forms of quasi-citizenship: a curtailed traditional citizenship in the case of Mexico, and a novel status with certain rights and benefits in the case of Turkey. The argument, as proposed above, explains this difference in two steps. First, forms of quasi-citizenship reflect transitional equilibria that emerge from different constellations of preferences for plural citizenship. Second, such preferences of sending states are shaped by different experiences with emigration. Therefore, the comparison is intended as a contribution to the studies of both citizenship and sending-state policies, and more importantly, to a better understanding of the links between them.

3 Plural citizenship and quasi-citizenship in citizenship constellations

Today dual citizenship is effectively possible in both Mexico-US and Turkey-Germany constellations. However, this result is reached after a long historical process of evolving regimes. The American regime displays the most stability, as plural citizenship has not been a problem to be avoided. In response to this, Mexico tried to maintain single-citizenship regime, resulting in one form of quasi-

citizenship. On the other side, Germany insisted on single citizenship for a long while, only to institutionalise plural citizenship recently and reluctantly. In response, Turkey not only codified plural citizenship quite early but also provided options to emigrants for keeping legal ties after naturalisation in Germany, resulting in another form of quasi-citizenship.

3.1 US-Mexico constellation

3.1.1 The United States

Nowadays, the US is probably witnessing the apex of anti-migrant attitudes. However, the historical variability of immigration policies stands in stark contrast to the stability of principles and legal norms which regulate the citizenship regime. On the one hand, it is true that the history of American immigration policy includes ethnically preferential treatment, such as the Chinese Exclusion Act of 1882 which was not abolished until World War II, qualitative and quantitative controls, and tightening legislation in the second half of twentieth century. On the other hand, the current definition of citizenship is traced back to the Civil Rights Act of 1866, constitutionalised in 1868 under Amendment XIV, according to which ‘All persons born or naturalized [*sic.*] in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.’

Resistance and tolerance towards dual citizenship stem largely from path-dependent processes (Faist, Gerdes and Rieple, 2004). As a result of the given definition of citizenship and its broader context, the US adopts a permissive approach to plural citizenship as well. Namely, she is historically an immigration country, naturally with a civic conception of citizenship supported by birthright acquisition through *jus soli*. The ensuing institutional practices also conform to this liberal pattern, which are visible in relatively easy naturalisation procedures. The only barrier against plural citizenship can be attributed to the Oath of Allegiance, a requirement for naturalisation, which begins with the statement ‘I hereby declare, on oath, that I absolutely and entirely renounce and abjure all allegiance and fidelity to any foreign prince, potentate, state, or sovereignty of whom or which I have heretofore been a subject or citizen.’ However, there is no formal requirement of renouncing any existing citizenship beyond this declaration, and despite this virtual incompatibility, plural citizenship has long been an unproblematic feature of the US regime (Bloemraad, 2007).

3.1.2 Mexico

The current version of the constitutional definition of Mexican citizenship is codified in Article 30 in 1997, as part of a citizenship reform which also removed restrictions on plural citizenship:

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 naturalization, of a Mexican father by naturalization, or of a Mexican mother by naturalization. IV. Those born in Mexican ships or aircraft, merchant or war.³

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 most 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. This choice can be explained by a strong component of *jus soli* in the conception of citizenship, which prevailed after the last amendments to the constitution. In this sense, although this reform was motivated by considerations for emigrants whose links to their home country could be more easily framed in terms of ethnicity or lineage, it did not lead to a re-ethnicised conception of citizenship (cf. Joppke, 2003).

In fact, while this version is a model of full *jus soli* complemented with restricted *jus sanguinis*, the previous version was a model of mixed *jus soli* and *jus sanguinis* with equal weight, providing the opportunity to become a citizen to anyone born on the territory and born to Mexican parents regardless of territory (Fitzgerald, 2005). 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. Of course, such measures would be meaningful insofar as Mexican authorities had access to the information on other citizenships, hence there was a large room for unreported plural citizenship.

Since there was no restriction on plural citizenship on the part of the US, the 1997 reform made dual citizenship legally effective. For this reason, the concept of quasi-citizenship applies to the case of Mexico mostly for the period before this reform. In this respect, the constitution makes an interesting distinction between nationality and citizenship, the former referring to the legal status only while the latter referring to the rights and duties associated with citizenship. Article 34

defines citizenship by adding further qualifications to nationality, and grants the rights to vote and be elected to the citizens. When the entitlement to enjoy the full set of rights is conditional upon residence criteria, for instance by denying voting to expatriates, nationality alone thus become a form of quasi-citizenship, comparable to Turkish blue card which is discussed below (Faist, 2000). However, external voting was immediately implemented after the institutionalisation of plural citizenship, thus the formal distinction between nationals and citizens became practically insignificant.

3.2 Turkey-Germany constellation

3.2.1 Germany

The path dependence of citizenship regimes is also apparent in Germany with a completely different historical legacy. The conception of German nationhood in ethno-cultural terms is reflected in the citizenship regime (Brubaker, 1994). The Federal Republic used the Nationality Law of 1913 as its basis of citizenship regime; while she clearly dissociated herself from preceding practices, she also found it difficult to depart from the basic conception of nationhood and to recognize that it had become an immigration country (Klusmeyer, 2009). The resulting regime is characterised by strong *jus sanguinis*, difficult naturalization procedures and insistence on single citizenship (Hailbronner and Farahat, 2015), implying that policy evolution is only possible through slow and gradual change (Green, 2004).

Although Germany finally recognised having become an immigration country, further constraints on the evolution of the regime included the mobilisation of anti-immigrant public attitudes combined with tactical electoral considerations, which limited the room for reform to elite-level negotiations (Green, 2005; Howard, 2008). The SPD-Green coalition provided an opportunity in this respect, but their nationality law reform in 2000 fell short of expectations and did not result in a law as liberal as it was advertised (Green, 2012). Yet one remarkable development was the introduction of a model of *jus soli* conditional upon the renunciation of any other citizenship at the age of majority. It has taken yet another decade to introduce plural citizenship into the government agenda as a compromise for the present grand coalition, and the institutionalisation of plural citizenship has taken the form of waiving the requirement of choosing only one citizenship. Although this last change is not a full endorsement of plural citizenship (Hailbronner and Farahat, 2015), it is eventually possible to be a dual citizen in Germany after a slow process of change.

3.2.2 Turkey

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. With a strong genealogical component, the ethno-cultural conception of Turkish citizenship seems at odds with the republican premises of the constitution (Kirisci, 2000). Turkish citizenship can thus be understood in terms of its monolithic character assuming a unique identity, constituted on republican but state-centric premises, and culturally embedded in the national identity (Içduygu, Çolak and Soyarik, 1999). While these aspects have remained more or less static, the major changes to the Turkish citizenship regimes have been realized to address new conditions caused by emigration (Kadirbeyoglu, 2009). Therefore, the acceptance of dual citizenship is completely compatible with the general character of Turkish citizenship; it is even difficult to frame this as re-ethnicisation since the conception was sufficiently ethno-cultural to begin with. As a result, Turkish authorities removed the restrictions on dual citizenship as early as 1981, only two decades after the first wave of emigration.

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 naturalization. Although Germany was in a good position to control the fulfilment of such requirements, there was still the possibility to circumvent them and possess dual citizenship. For example, in the past 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 Turkish citizenship before naturalisation and re-acquiring it afterwards, for which Turkish authorities were being extremely helpful (Rumpf, 2003). However, not only German authorities closed these loopholes, but also they eventually institutionalised dual citizenship. Until this time, quasi-citizenship emerged from legally less contentious attempts of Turkish authorities to promote the acquisition of German citizenship.

In that 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 political rights. The first formulation in the Citizenship Law created a status that could be transmitted by descent without any limit, making it almost indistinguishable from citizenship, which could

have looked like, from the viewpoint of German authorities, an equivocation to re-brand Turkish citizenship and circumvent the German system. Apparently, Turkish authorities also decided that this was excessive, as they curbed its transmission to the children born before the renunciation of citizenship.

Finally, on the issue of political rights of citizens, Turkey was not able to implement effective external voting due to several legal and practical impediments, despite the willingness of governments for a while (Kadirbeyoglu, 2012), but finally overcame these difficulties by 2014 presidential elections. Beforehand, a modest version of external voting had existed in the Turkish electoral system in the form of placing ballot boxes in border zones during 70 days before elections. Therefore, it can be safely argued that Turkey did not deny voting rights to emigrants on the basis of residence requirements, and Turkish emigrant citizens cannot be seen as quasi-citizens insofar as they hold the legal status unconditionally associated with the exercise political rights.

4 Factors shaping the preference for plural citizenship

Since quasi-citizenship emerges as a transitional equilibrium due to the failure to effect plural citizenship in a particular constellation, and since this failure occurs due to at least one party not preferring plural citizenship, then it is imperative to understand the factors shaping such preferences in order to account for the (past) existence of quasi-citizenship, and concomitantly the pace and timing of the transition to a constellation of effective plural citizenship. For this purpose, the discussion below will look into the experience of Mexico and Turkey with emigration in order to reveal such factors, hence explain diverging preferences for plural citizenship. These can be grouped into two: first, the factors shaping the emigration itself, and second, the adoption of active sending-state policies once a significant emigrant community becomes permanent.

4.1 Becoming emigration countries

4.1.1 Mexico

Although emigration from Mexico dates back to the nineteenth century, the US Emergency Quota Act of 1921 constitutes a crucial turning point, as it exempted Mexicans (indeed Latin Americans) from immigration restrictions. However, Mexico was an under-populated country, hence the government was seeking to prevent any outflow of population⁴. Yet it was unable to do so due to the lack of control over borders on the part of Mexico and the welcoming of the crossers

by the US. Nonetheless, 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, this time through bilateral agreements such as the Bracero Programme, had a better control over the flows. The underlying idea was to institutionalise migration as the supply of temporary workers. However, many migrants did not return and stayed in the US after the end of the programme in mid-1960s, despite the disincentives for staying (such as, not allowing family members) and the incentives for returning (such as 10% of the salary being conditional). Since the US was more willing to limit migration thereafter, Mexico had the flexibility to leave the burden of restrictions on the US, hence following the ‘policy of not having a policy’ (Martinez-Saldana, 2003).

The demographic concerns largely followed economic concerns, especially employment. In particular, the adoption of import substitution industrialization (ISI) by Mexico as the development strategy was closely related to emigration becoming more viable, or even desirable (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. Although emigration could not solve the employment problem by itself, it was a temporary measure to mitigate its effects, and remittances were much appreciated.

Finally, the political situation creates an additional layer which shapes both the pressures for emigration and the government response. Broadly, the undemocratic character of the regime can be seen as causing not only politically motivated emigration by dissidents, but also an inability to reform the system and to develop successful migration policies. Yet the government stance on politically motivated migration also changed over time: while earlier concerns before the consolidation of regime were focused on opposition from abroad as a serious threat, later emigration came to be seen as exit option, hence a stabilising factor.

4.1.2 Turkey

Unlike Mexico, Turkey did not experience emigration as a challenge that aggravates under-population. Although the new republic was founded after a series of war which lasted more than one decade and indeed led to severe under-population, demographic policies were focused on immigrants from former territories of the Ottoman Empire until population recovery in 1940s. Meanwhile, freedom of

travel was also legally restricted until 1961, and there was no need for additional measures in the absence of easily reachable attractive destinations among bordering or nearby countries. Thus, Turkey's history of emigration starts directly with intergovernmental agreements with Germany⁵.

From this point onward, the similarities with Mexico's experience after Bracero Programme are numerous. Migrants were initially expected to be temporary 'guest' workers (*Gastarbeiter*), but they became permanent residents and prepared the basis for further migration through family unification which was not allowed in the first place. When bilateral agreements ended as Germany faced severe economic problems such as stagflation after the Oil Crisis, 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. Similar to Mexico, Turkey also adopted ISI as a development strategy. In line with ISI objectives, three major aims of the Turkish authorities in deciding to allow, encourage and organize migration were reducing unemployment, expanding foreign exchange reserves and upgrading human capital (Sayari, 1986). Although the objective of human capital upgrade through returning migrants was not met, temporary reduction of unemployment and increased foreign exchange inflow made positive contributions to development goals.

In terms of political pressures, 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, due to several military interventions, regime consolidation was spread over decades, and an undemocratic character of the regime also shaped emigration. In this context, asylum seeking in Germany became common during the political turmoil of 1970s and especially following the military intervention of 1980. While opposition from abroad was a relatively minor concern, politically motivated emigration gave the military regime the option to relieve political pressures by depriving the fleeing dissidents of their citizenship. Ironically, however, it was the same military regime which legislated dual citizenship without any democratic contestation.

4.2 Adopting sending-state policies

4.2.1 Mexico

Once emigration occurs, ignoring emigrants is usually not a realistic option, and sending states develop specific policies, the motives for which primarily include securing economic resources, mobilising political support and providing protec-

tion and upward social mobility (Østergaard-Nielsen, 2003a). The last aspect may be either genuinely benevolent as expected from a state towards its citizens, or a way of further enhancing economic and political benefits that can be received. To begin with the economic sphere, following the above discussion on economic pressures, the obvious benefits consist of remittances, but these are not limited to ISI-related objectives since current account deficits have continued to be a serious challenge. Despite declining significance as a source of domestic development over the last decade (Jones, 2014), the role of remittances in the Mexican economy has been remarkable up until today. Comparing the figures reported in 2008 and 2016 (World Bank, 2008, 2016), the recent decline corresponds to 2.6% and 2.0% of GDP respectively, which still makes Mexico one of the top remittance-receiving countries.

Although some emigration is partially motivated by political dissidence, the resulting transnational links generate new opportunities for international political objectives. While foreign policy considerations certainly create incentives for reaching out to emigrants, there is a serious risk of provoking receiving states by breaching the non-intervention principle (Délano, 2009). Nonetheless, when the issue is cooperation between home and host countries, notably regional integration, conflict is less likely (Escobar et al., 2006). During the formation process of NAFTA, Mexican government was more actively promoting the project and attributed an important role to emigrants to overcome the relatively reluctant attitude of the US (Goldring, 2002). This meant that the establishment of NAFTA played a central role in pushing Mexican government to embrace emigrant communities (Délano, 2011).

Despite these objective benefits, the views on emigrants in home countries can be quite negative especially in terms of social perceptions or cultural aspects. For instance, derogative labels such as *pochos* and *pachucos* are used for Mexican-Americans to refer to their dissimulation 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 the image of emigrants who abandoned their homeland, hence a sense of betrayal. Yet, in later periods, negative views came to be replaced by the idea that they support their homeland from abroad, which is especially visible in the official discourse (Martinez-Saldana, 2003). In other words, pursuing sending-state policies has become socially more acceptable over time.

However, the agency of emigrants should not be neglected and their compliance cannot be presumed. In fact, critical attitudes towards Mexican government and little interest in Mexican politics are prevalent among emigrants, and the basis of their actions will be their interests but not abstract national attachments to the homeland (Garza and DeSipio, 1998). 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). In this respect, since unilateral policies cannot succeed alone, stronger economic and political incentives for reaching out to emigrants in the last decades brought about intensifying endeavours to institutionalise the links with them (Cano and Délano, 2007). On the one hand, emigrant organisations scattered across the US provided the opportunity of direct contact for the government; on the other hand, the government also sought to improve central coordination through Institute of Mexicans Abroad (*Instituto de los Mexicanos en el Exterior*) (Fitzgerald, 2009).

More importantly, when the common interests of the Mexican government and emigrants are at stake, providing protection and upward social mobility becomes the crucial part of sending-state policies. The nationality of home country naturally entails diplomatic protection and inalienable right to re-entry; on this front, for instance, Mexican consular officials succeeded in ensuring special treatment for undocumented Mexican migrants (Bakker, 2011). Beyond this, enabling the acquisition of host country citizenship empowers the emigrants to protect themselves, to improve their social status and to have political influence, while the most effective action for this purpose is accepting dual citizenship in the domestic legal system (Jones-Correa, 2001). In this respect, several anti-immigrant legislations in the US, such as California Proposition 187 of 1994, Welfare Reform Act and Illegal Immigration Reform and Immigrant Responsibility Act of 1996, prompted Mexico to recognise the empowerment of emigrants as an imminent issue (Castañeda, 2004; Escobar, 2006). Therefore, the eventual acquiescence in plural citizenship can be linked to not simply the crystallising economic and political benefits or improving social perceptions, but also intensifying institutionalisation of relations and the realisation of common interests which call for a better status in the host country.

4.2.2 Turkey

The main incentives for the Turkish governments to reach out to emigrants can also be understood in terms of economic and political benefits, and their overlapping interests to empower emigrants in Germany. In the economic dimension, similarly to Mexico, a particular importance was attached to remittances not only during ISI period, but also after the liberalization of the economy towards an export-led model. Yet compared to Mexico, the overall significance of remittances remained minor and declined to very low levels. Looking at the same sources for recent data (World Bank, 2008, 2016), remittances in the Turkish economy constituted 0.3% of GDP in 2008, falling to almost 0% today, which means that she is not among the top remittance-receiving countries any more.

In the dimension of international political objectives, Turkey's bid to become a member of the EU is comparable to Mexico's interest in NAFTA, albeit with several major differences. Turkey is trying to accede to an advanced level of regional integration; both the conditions of accession are more demanding, and a possible future membership would have more serious economic and political implications. When the goal of accession is high in Turkish political agenda, emigrants might have invaluable influence on the attitude of current members whose approval is indispensable, and in particular Germany, the biggest member of the EU (Østergaard-Nielsen, 2003*b,c*). Furthermore, EU membership has direct implications for citizenship; if Turkish emigrants in Germany were classified as EU citizens, they would be subject to privileged treatment for dual citizenship without the requirement of renouncing their existing nationality. In other words, the effect of Turkey's accession to the EU on plural citizenship would be equivalent to convincing Germany to amend her nationality law.

As for social perceptions about emigrants, forms of contempt similar to Mexico exist in Turkish society as well; the term *almancı* 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, however, an element of betrayal is not reflected in these views. The official counterpart of this has been expectations from migrants to represent modern and secular Turkey, as opposed to their traditional backgrounds (Østergaard-Nielsen, 2003*c*). However, approaching the identity of migrants with modern-traditional dichotomy is a deep misconception; Turkish emigrants in Germany and other countries of the EU display a hyphenated identity that combines identification with Turkey, Germany and Europe at the same time, and transnational practices that cannot be limited to any of the national spheres (Kaya, 2012). In this sense, a possible accession to the EU would not only serve their interests, but also affirm their identities, and unsurprisingly their support for this goal is strong (Kaya and Kentel, 2005).

Nevertheless, this is one of the few areas in which Turkish authorities can receive overarching support. Otherwise, the Turkish community in Germany is deeply divided along party-political, ethnic and religious lines, replicating the divisions in Turkey, carrying the political fragmentation of Turkey into German public sphere, and resulting in a high number of associations representing diverse views and interests (Østergaard-Nielsen, 2003*b*; Ögelman, 2003; Yurdakul, 2006). In order to deal with this diversity, Turkey followed a similar path as Mexico, and established central coordination offices which are more recently structured into the Secretariat of Turks Abroad and Kin Communities (Yurtdışı Türkler ve Akraba Topluluklar Başkanlığı), paying special attention to extending the continuous contact with Turkish NGOs in Germany.

Probably the most interesting aspect of the Turkish case is that the acceptance of dual citizenship precedes all these institutional attempts. At that time, the EU accession was at best a vague and distant goal which cannot be argued to have directly resulted in a radical citizenship reform. In the subsequent decades, with the advance of EU membership in the Turkish political agenda, Turkey developed a stronger interest in creating sympathy for herself in German politics. Her approach to plural citizenship also evolved in a parallel way: from simple acceptance to active promotion, and to an expression of dissatisfaction with German insistence on single citizenship.

5 The trajectories of plural citizenship and quasi-citizenship

The above comparison is intended to reveal reasons behind diverging preferences of emigration states regarding plural citizenship. To begin with explanation from within citizenship regimes, the overall conception of nationhood and citizenship in the examined countries constitutes the background against which any reform occurs, irrespectively of the experience with emigration. Moreover, such conceptions and the institutions built upon them have a resilient nature. In this sense, the territorial conception in Mexico is biased against the absent nationals, especially those born abroad, while the ethno-cultural conception in Turkey prioritises ethnic and cultural ties. Although one can argue that this is enough reason to cause diverging preferences, the discussion below will show that emigration experience is decisive in reinforcing the pre-existing differences or breaking institutional resilience.

When the two cases are compared, it is apparent that an important part of their differences correspond to distinct historical experiences. Namely, the emigration from Mexico to the US has its roots in the XIXth century and covers the entire XXth century, while the emigration from Turkey to Germany only started in 1960s. In the time period after the mid-XXth century, they display highly similar features: controlled migration through bilateral agreements, desirable for development objectives and unchallenging in demographic terms, dilemmas of politically motivated emigration, etc. But in the time period which only concerns Mexico, her experience is characterised by undesirable and demographically challenging emigration, which led to a historical legacy of scepticism towards emigrants, with several forms of contempt in the society and even a sense of being betrayed. Although many conditions which underlie such negative views ceased to exist in later phases of emigration, and although emigrants proved to be beneficial to their home countries, socially entrenched scepticism is likely to delay attempts to fully

endorse emigrant communities. On the other side, the absence of a comparable negative experience in Turkey meant that full endorsement was unproblematic, and plural citizenship could be institutionalised as soon as it was realised that emigrants had become permanent residents of another country.

As for the factors which led Mexico and Turkey to develop sending-state policies, they differ in the relative importance of economic and political benefits. First, remittances are obviously important for developing economies especially with serious current account deficits. But their significance has been higher in Mexico, and decreased much more rapidly in Turkey. Second, both states followed a regional integration agenda, but stakes were much higher in the case of Turkey. While it is impossible to measure the balance between two different categories of expected benefits, the relevance of citizenship differs between them. First, remittances are primarily motivated by social links with home countries, in particular remaining family members. Even if the government can use institutional channels to encourage remittances, citizenship in the country of residence is not a precondition for being able to send money to the home country; accepting plural citizenship could at best be a concession on the part of the government. In this sense, the higher importance of remittances did not necessarily create strong incentives for Mexico to reform her citizenship regime. In the case of Turkey and political benefits, the goal of creating sympathy for herself in German politics heavily depended on the political influence of migrants, and the accession to the EU was clearly an area of overlapping interests between the government and expatriates. Mexico had similar incentives only when the legal and political empowerment of emigrants in the US was seen as an imminent necessity.

Consequently, the preference for single citizenship remained strong in Mexico, and what led to a form of quasi-citizenship was the incompatibility of this preference with the regime existing in the US which had already been favourable to plural citizenship. The same reasons which explain Mexico's reluctance can also be attributed to retaining a system which does not take resident and absent nationals as equal. Thus with a legal category of nationality short of citizenship, Mexican emigrants could only enjoy a status of quasi-citizenship until the reform which institutionalised plural citizenship. In the case of Turkey, with the early acceptance of plural citizenship and the active promotion thereof, a form of quasi-citizenship emerged because of Germany's insistence on single citizenship. Since the renunciation of Turkish citizenship was a precondition for the acquisition of German citizenship, Turkey had to invent a new status, to which certain rights or privileges could be attached. Yet this status has become redundant with the effective transition to plural citizenship after recent changes in Germany.

Although both constellations ended up in effective plural citizenship regimes, the limits should also be noted. Mexico institutionalised plural citizenship together with a restriction on its transmission abroad. Without this last provision,

she was unable to know through ordinary means who had been naturalised into US citizenship, that is, to ensure full compliance with single citizenship rule. The reform allows dual citizenship, but also prevents an uncontrollable expansion of absent citizens. In this sense, it is as much a response to the need for plural citizenship as a response to the inefficiency of resisting it. On the other side, Germany institutionalised plural citizenship by waiving certain conditionalities, but not explicitly recognising it. This was due to a political compromise necessary for a coalition government to be formed, and it is yet to be seen whether the changing balance of power will cause a fall back to the previous system or to a full endorsement.

6 Conclusion

This paper has conceptualised quasi-citizenship as a category which is less extensive than full citizenship in terms of its constituent aspects, but which partially performs functions which are traditionally associated with citizenship. While resident non-citizens, or denizens, provide a familiar example of this concept, the focus here has been on the forms of emigrant quasi-citizenship. It has been argued that quasi-citizenship is a transitional equilibrium on the path to plural citizenship, emerging from an incompatibility of sending and receiving state preferences regarding the latter. Such preferences of the sending states depend on their experience with emigration. The comparison of Mexico and Turkey reveals that the historical legacy of past undesirability of emigration can result in an insistence on single citizenship, while higher relevance of citizenship for international political goals lead not only to swift acceptance of dual citizenship, but also to the active promotion of the acquisition of host country citizenship. Consequently, where the sending state pulls the equilibrium away from plural citizenship, quasi-citizenship takes the form of curtailing the existing category of citizenship, and where the sending state pushes the equilibrium towards plural citizenship, quasi-citizenship takes the form of inventing new statuses.

Both of the studied cases ended up in constellations of effective plural citizenship regime, conforming to an overall pattern of the multiplication of citizenship. While quasi-citizenship is a category of the past in this regard, its position as a precedent of this multiplication highlights the continuing relevance of citizenship. In this sense, to reiterate a previous point, although quasi-citizenship is a lighter form of citizenship, its existence is not an indicator of an overall lightening of citizenship. On the contrary, it is a place-holder for situations where the existing regimes do not sufficiently accommodate the needs of transnational spaces occupied by migrants, and paves the way for full citizenship status to take up related functions.

Two further implications of the argument for broader studies of citizenship and transnational migration can be derived by distinguishing the asymmetry in the reciprocal preferences of sending and receiving states from two other types of asymmetry. First, emigration in the form of ‘labour export’ is embedded in the economic and political asymmetry in favour of receiving states, but this does not mean that they will set the terms of the citizenship constellation. In the Mexico-US constellation, it is the sending state’s decision for reform which completed the transition to plural citizenship. In the Turkey-Germany constellation, blue card ensured that the renunciation of citizenship, as required by Germany, would not cease the legal links between emigrants and Turkey. Second, the incompatibility of preferences regarding plural citizenship can occur when the reciprocal regimes share the same conception of citizenship. Namely, both Mexico and the US have a territorial conception, and both Turkey and Germany have an ethno-cultural conception. Yet these conceptions result from institutional legacies, which precede the emigration flows under scrutiny, and what translates them into preferences for plural or single citizenship is the factors related to their experience with transnational migration.

Notes

¹New Zealand comes forth as the main exception to this rule. Further exceptions can be found elsewhere usually for local elections, for example within the EU, or for a specific group of immigrants, such as Commonwealth citizens in the UK.

²Significant Turkish migrant communities also exist in other European countries, notably Austria, France, Belgium, the Netherlands, etc. However, Germany is by far the most popular, not least the oldest, destination and she occupies a particularly important place for Turkish migration policies.

³The author’s translation from the Political Constitution of the Mexican United States (Constitución Política de los Estados Unidos Mexicanos).

⁴A considerable part of the factual information enclosed in this section draws on David Fitzgerald’s works, in particular Fitzgerald, 2006, 2009, unless otherwise stated.

⁵A considerable part of the factual information enclosed in this section draws on Nermin Abadan-Unat’s works, in particular Abadan-Unat, 2011, unless otherwise stated.

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