

Dual Citizenship, Extraterritorial Elections and National Policies: Turkish Dual Citizens in the Bulgarian-Turkish Political Sphere

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Introduction

During the last decade, the traditional assumptions about citizenship have been challenged. Numerous recent studies have dealt with emerging practices and experiences concerning legal, cultural and civic aspects of citizenship, especially cross-border forms that exceed the jurisdiction of the nation state. Nowadays this re-imagination of citizenship goes hand-in-hand with a strong tendency to keep the legal aspect of citizenship close to the nation state. This tendency seems especially strong in Southeastern Europe, where the post-communist nation building process continues under the impact of significant minority problems and approaching integration to the supranational formation of the European Union (EU). Citizenship in the contemporary Balkans still preserves deep cultural content and serves as a source of national belonging and solidarity. However, multiple citizenship can serve to enlarge national identity across territorial borders and build up links to new forms of political participation that encourage closer cooperation and further social movements across national boundaries.

The case of the dual citizen community in Turkey and Bulgaria represents an example of extraterritorial citizenship developing in conjunction with growing nationalism from below and increasing cross-borderness. It demonstrates a process of a relative re-configuration of the main components of citizenship, such as representation, rights, obligations, and loyalty. Dual citizenship also brings to the fore the consequences of Bulgaria's moving national identity towards an exclusive,

selective, or limiting content based on a precisely defined loyalty criterion.

This paper deals with the extraterritorial exercise of voting rights in the case of dual citizens living in Turkey. The political participation of home minorities and their expatriates as dual citizens presents one of the sensitive issues in dual citizenship policies in states with strong ethnic identity, such as the Balkan states. In this frame, the case of Bulgaria and its kin minority and dual citizenship policies toward its expatriates with Turkish origin presents an interesting case for further elaboration of states' dual citizenship policies in the region. By examining this electoral practice as well as the changing politics of the two states and NGOs, this paper introduces some of the limits, alterations, and the overall complexity of the character, function and position of dual citizenship status, both in cross-border societal relations and interstate policies. By assessing the electoral participation of the dual citizen community in the Bulgarian elections held in Turkey, the paper shows how extraterritorial exercise of political rights may lead to ethnic reconstruction of citizenship policies and trigger different perceptions of dual citizenship in home states.

This paper examines Turkish and Bulgarian kin policies in two main aspects: kin minority protection policies and dual citizenship. The dual citizenship policies are examined as a model of kin minority protection in the Turkish case and as post-communist nation building process in the case of Bulgaria. The paper begins with an overview of the dual-citizens, paying particular attention to their shifting identity and role in the cross-border practices. The second section presents the changes in citizenship status of the dual citizen community since World War II and clarifies its current status. Before examining the dual citizenship discourses surrounding the cross-border electoral politics during the last decade, the paper briefly reviews the dual citizens' participation in Bulgarian elections. The last section evaluates the national dual citizenship policies and differential applications of the notion of dual citizenship on the two sides of the Turkish-Bulgarian border. First, it introduces the dual citizenship discourses in Bulgarian society and consequent state policies. The next part investigates the complexity of Turkey's kin minority protection and dual citizenship policies. In the conclusion, the paper compares the two dual citizenship policies. The role of cross-border NGOs in developing dual citizenship status across the

Bulgarian-Turkish border highlights it as a potential model for kin minority self-protection based on international norms on human and minority rights.

I. The ‘Great Migration’ of 1989 and the Formation of the Dual citizens’ Community

The phenomenon of dual citizenship is closely connected to the issue of migration. Throughout the 20th century, the Turkish-Bulgarian border was an active site of cross-border migration, encountering six refugee and migrant flows that forced around two million Bulgarian Turks and Pomaks to leave their places of origin. According to Ministry of Interior’s statistics, from the proclamation of the Turkish Republic until 1996, Turkey received 790,793 migrants from Bulgaria¹ (See Table 1).

The ‘Great Migration’ of 1989 drove 312,000 people towards Turkey. After the fall of Zhivkov and communist regime in November 1989, some 125,000 returned to Bulgaria. At the end of 1989, the refugees’ back-forth movement ceased and 245,000 refugees were granted Turkish citizenship.²

Table 1: Turkish and Muslim Migrations from Bulgaria by Years;

| YEARS | MIGRANTS |
|---------------------|------------------|
| 1877–1878 | 1,000,000 |
| 1883–1902 | 395,456 |
| 1912–1913 | 440,000 |
| 1923–1934 | 110,507 |
| 1935–1949 | 109,884 |
| Oct. 1950–Nov. 1951 | 154,000 |
| 1969–1978 | 130,000 |
| June–August 1989 | 250,000* |
| TOTAL: | 2,687,177 |

Source: Bilal Şimşir, *Bulgaristan Türkleri 1878–1985* (Ankara, 1986), p. 211.

¹ ‘İçişleri Bakanı Meral Akşener’in Konuşması’, *Genel Kurul Tutanağı*, 20. Dönem, 2. Yasama Yılı, 60. Birleşim (Ankara, 25 February 1997), pp. 11–12.

² Kemal Kırisci, ‘Refugees of Turkish Origin: “Coerced Immigrants” to Turkey since 1945’, *International Migration*, 34:3 (1996), pp. 385–412.

* The number of the refugees who returned to Bulgaria is not included. The number represents only these refugees who settled in Turkey and acquired Turkish citizenship.

These refugee flows were followed by steady economic migration. Especially after the 1991 economic crisis in Bulgaria, many Turkish-speaking Bulgarian citizens moved to Turkey in search of Turkish citizenship. Despite the restrictive immigration policies applied at that time, many young people succeeded in illegally crossing into Turkey. Since most of these migrants are not officially registered, it is difficult to determine the real number of economic migrants residing in Turkey since 1989. According to unofficial statistics, their numbers reach 200,000.³ According to the official statistics of 1997, there were around 76,000 unregistered migrants with tourist visas and about 33,123 with temporary residence.⁴ Most of these migrants hold only Bulgarian citizenship, and likely have applied for Turkish citizenship. Therefore, the ones who fall under Bulgaria's dual citizenship policies turn out to be Turkish migrants who left Bulgaria between 1969 and 1989. According to official migration statistics, they form a community of around 380,000 people (See Table 1). Under the new citizenship law, these migrants have the right to regain their Bulgarian citizenship while keeping the Turkish one. In this way, as dual citizens, these migrants became members of a new cross-border community, developing and sharing a double notion of loyalty, rights, and obligations.

II. The Dual Citizens: Changing Status, Civil Rights, Benefits and Costs in Extraterritorial Social Space

As summarised by Bendix, 'the codification of the rights and duties of all adults who are classified as citizens' constitutes a core element of nation building process.⁵ Bulgarian citizenship law during 20th century mainly developed as an aspect of nation building. The status, thus rights and duties of ethnic minority citizens, were defined according to attributes of

³ Tsvetana Georgieva, 'The Motivation of Bulgarian Turks to Migration' in Antonina Zhelyazkova (ed.), *Between Adaptation and Nostalgia: The Bulgarian Turks in Turkey* (The Fate of the Muslim Communities in the Balkans vol. 3; Sofia, 1998), p. 47.

⁴ 'İçişleri Bakanı Meral Akşener'in Konuşması', *Genel Kurul Tutanağı*, 20. Dönem, 2. Yasama Yılı, 60. Birleşim (Ankara, 25 February 1997), pp. 11–12.

⁵ Reinhard Bendix, *Nation-Building and Citizenship: Studies of Our Changing Social Order* (New Brunswick, NJ, 1996), p. 90.

national citizenship. The last citizenship law broke with this practice and established Bulgaria's most inclusive citizenship law of the 20th century.

According to the previous mono-national citizenship laws of 1903, 1940 and 1948, emigration or acquisition of foreign citizenship were considered legal reasons for terminating the Bulgarian citizenship of non-Bulgarian emigrants. For instance, according to Article 15 of the Citizenship Law of 1940, Bulgarian citizens with non-Bulgarian origin lose their Bulgarian citizenship when the emigration process is completed. Restoration of the lost citizenship is restricted to foreigners with non-Bulgarian origin, and according to Article 24, the only way to restore Bulgarian citizenship is marriage with a Bulgarian citizen of Bulgarian origin.⁶ This framework was confirmed by a 1950 amendment to Article 6 of the Law of 1948,⁷ which was introduced immediately after the emigration of 151,000 Turks and Pomaks to Turkey. In accordance with Article 1 of the European Convention for Prevention of Dual Citizenship and under the provisions of the Law of 1968, the requisition of another citizenship was deemed an adequate condition for loss of Bulgarian citizenship.⁸ Many Bulgarian asylum seekers, Jewish, Turkish and Pomak migrants, and other refugees were treated within the framework of these articles and excluded from Bulgarian citizenship between the years 1940 and 1978.⁹ They also lost their property three months after the emigration completed. During these years, multiple citizenship was forbidden and the requisition of Bulgarian citizenship was tied to a complete resignation from any other citizenship, as well as approval from the Ministry of Internal Affairs and Justice.¹⁰

All these discriminative provisions have been revoked by the 1998 Citizenship Law. The new Citizenship Law defines citizenship by origin and place of birth, and according to the provision of Article 3, it accommodates multiple citizenship. Therefore, dual citizens are treated as Bulgarian citizens at the moment they enter Bulgarian territory, and they should have the rights and obligations of Bulgarian citizens. Dual citizens

⁶ *Zakon za Bulgarskoto Podanstvo*, Obnarodvan, DV br. 288 (20 December 1940).

⁷ *'Zakon za Bulgarskoto Grazhdanstvo'*, Obnarodvan, DV br. 70 (26 March 1948), *Nova Al.* 2 – DV br. 272 (1950).

⁸ *Ism.* – DV br. 83 (1963).

⁹ Veselin Tsankov, *Bulgarskoto Grazhdanstvo* (Sofia, 2000), pp. 32–33.

¹⁰ DV br. 83 (1963).

should fulfil their military service, pay their taxes, and obey the administrative rules. However, the new Act does not encourage multiple citizenship in its implementation. After the 2001 amendments to Articles 12, 13 and 15, acquiring Bulgarian citizenship became tied to release from any other citizenship and at least three years of permanent residence after the submission of the initial application.¹¹ Before the changes in 2001, Article 26 also required a permanent residence of three years from the emigrants of 1989. With the 2001 modifications, this article was fixed, and former Bulgarian citizens who lost their Bulgarian citizenship because of emigration were placed under a transitional provision that called for a period of one year for submission of applications. A similar transitional provision is applied for restoring Bulgarian citizenship for those deprived of it due to the Laws of 1940 and 1948.¹²

In practice, the new Law gave the 1989 migrants an opportunity to renew their Bulgarian citizenship while keeping their Turkish one. The exact number of migrants with dual citizenship is not yet available. One difficulty in determining the number comes from the fact that the dual citizen migrants hold different names on the each side of the border; in Bulgaria they are registered with the Bulgarian names given to them in 1985 and with their native Turkish names in Turkey. So, in the Bulgarian population registers they appear as citizens of Bulgarian origin. In Turkey, the unofficial numbers range from 50,000 to 250,000. For now it is clear that most of the dual citizens are migrants of 1989. Together with the economic migrants who moved to Turkey after 1993 and already received or applied for Turkish citizenship, the Law of 1998 created an unusual transnational social space of thousands of dual citizens moving back and forth, transferring goods, services, knowledge, biases, and values across the Bulgarian-Turkish border.

Moreover, dual citizenship granted migrants an alternative country in which to work, study, live, or invest. For example, many young migrants who could not manage to enter Turkish universities applied to Bulgarian ones. They also tried to benefit from the two citizenship statuses by entering the exams as foreigners, but paying lower tuition as Bulgarian

¹¹ *State Gazette* 41 (26 April 2001).

¹² 'Law for Bulgarian Citizenship', Prom. *State Gazette* 136 (18 November 1998); amend. *State Gazette* 41 (26 April 2001); suppl. *State Gazette* 54 (31 May 2002).

citizens.¹³ In addition, since it was easier and faster to complete military service in Bulgaria, many young dual citizens preferred to do so in Bulgaria. Together with the agreement to avoid double taxation, the dual status obviously bestowed some special privileges on the migrants. That is why the locals, both in Bulgaria and Turkey, started to regard dual citizens with resentment. Whether intended or not, dual citizenship came to be characterised by the locals on both sides of the Turkish-Bulgarian border as an unfair advantage and misuse of rights and freedoms.

Nonetheless, the problem appeared when the question of equal social and political rights entered into the Bulgarian political agenda. When the dual citizens started demanding their social and political rights, nationality became an important element. Controversial phenomena, such as extraterritorial elections, dual loyalty, social security transfers, shared employment, and migrants' capital filled the growing dual status discourses in Bulgaria. One of the most discussed aspects was the voting rights of Bulgarian citizens with Turkish origin residing in Turkey.

III. Dual Citizens' Voting: A Right or Privilege in Extraterritorial Political Sphere

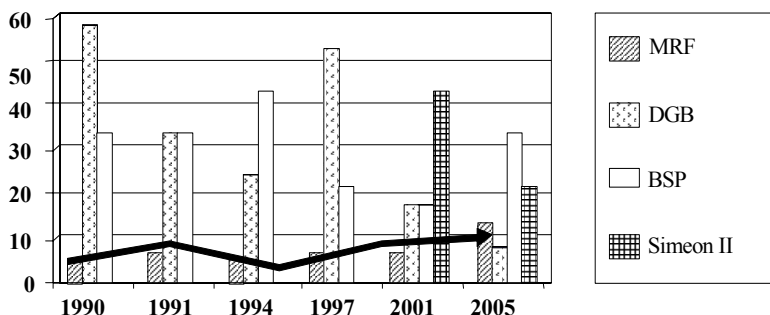
Voting, one of the main elements of citizenship, serves as an assurance for representation, or furthermore, as a way of collective action representing a special, semi-autonomous public field. First approached as an obligation, voting turned into a right, one that triggered many controversies involving civil rights and equal participation of dual citizens in Bulgarian society. At the end of the discussions, extraterritorial elections were approached as a privilege granted to minorities with dual citizenship.

1. The Dual Citizens' Vote as Cross-border Minority Politics

After the fall of the Zhivkov regime and the increased ethnic tension caused by the Great Migration, the Movement for Rights and Freedoms (MRF), a political party representing the country's Turkish and Muslim

¹³ Tsankov, *op. cit.*, pp. 34–35.

Graph 1: Change in Electoral Performance of the Movement for Rights and Freedoms



minorities, entered the Bulgarian political scene. As Graph 1 shows, the Movement showed remarkable success in the first democratic elections of 1991 and reached 9.5 per cent of the electoral vote. Following the economic crisis of 1990, the economic situation in Bulgaria worsened, causing intensive economic emigration of Turkish-speaking citizens to Turkey. Because of these movements and the inability of MRF-supported coalition governments to find solutions for the emergent economic problems, the potential electorate of MRF gradually decreased. The elections of 1994 showed an almost 30 per cent electoral drop, primarily as result of emigration to Turkey.

Due to the collapse in the tobacco, agriculture, and construction sectors, the unemployment in the Turkish and Pomak regions reached unbearable levels, and the expectations for a better future evaporated across the whole country. As a result of massive emigrations between 1994 and 1997, numerous Turkish and Pomak villages were emptied. As the data of the National Statistical Institute show, Turkey is one of the favoured neighbouring countries for the Turkish-speaking emigrants. For instance, in 2002, 925,795 Bulgarian citizens visited Turkey for employment or tourist reasons.¹⁴ This number, combined with the total number of the refugees and migrants of 1989, forms a cross-border

¹⁴ Most classified as tourists are Bulgarian citizens with undocumented employment. For complete data, see: Rossitza Guentcheva, Petya Kabakchieva, Plamen Kolarski, *Migration Trends in Selected EU Applicant Countries*, Volume 1: *Bulgaria: the Social Impact of Seasonal Migration* (Vienna, September 2003), p. 22.

community of approximately 1,175,000 Turkish-speaking Bulgarian citizens living and exercising their national and ethnic identities across the Bulgarian-Turkish border. Approached in this way, this is a group that has considerable electoral potential.

The cross-border practices of this community provided mutual economic benefit to both countries, but it also significantly expanded domestic politics beyond the territorial borders. The *shifting identity* of the dual citizens group attracted political actors on both sides of the Bulgarian-Turkish border. While in Turkey dual citizens are Turkish citizens and members of the ethnic majority and migrant community of Bulgarian Turks, in Bulgaria they become Bulgarian citizens and members of the Turkish minority in Bulgaria. While for Turkey's politics this group does not have special significance due to Turkey's total population of 65 million, for Bulgaria, with a population of seven million, it constitutes an important electoral challenge. Moreover, when dual citizens vote in the Bulgarian elections, they vote as members of the Turkish minority, for they form the electoral base of MRF.

In 1994 MRF had faced a shrinking domestic base and faced the danger of falling under the 4 per cent electoral threshold. After this experience, MRF started to search for ways to attract the vote of the emigrants in Turkey and promoted the accommodation of dual citizenship status. In general, the dual citizenship policy was welcomed from the other political actors as well because a significant per cent of the young electorate also had left the country for economic reasons. By the end of the 90s, emigration reached almost 1/4th of the Bulgarian population. Out of the emigrants in Turkey, Bulgaria lost over 750,000 labourers to the Western markets. According to the Agency for Bulgarians Abroad, the number of Bulgarian citizens living abroad has reached two million.¹⁵ So, most of the political parties had lost a significant number of potential voters. Consequently, in 1998 the Kostov government introduced two important laws: the law for Bulgarians abroad and a new citizenship law accommodating dual citizenship. Both laws were oriented toward building ties with the Bulgarians abroad, including attracting their votes.

Following the introduction of the new citizenship law in 1998, the MRF started campaigning among its potential electorate in Turkey. Similarly, Kostov's the Union of Democratic Forces government expected

¹⁵ Tsankov, *op. cit.*, p. 157.

a hundred thousand Bulgarian votes from ‘Bulgarians abroad’. Contrary to his expectations, in the June 2001 parliamentary election, the vote of the ‘Bulgarians abroad’ remained limited to 4,000, which was unacceptable compared to the vote of the Turkish migrants in Turkey. The MRF received 38,840 out of 50,000 votes cast in Turkey.¹⁶ In this way, the dual citizens living in Turkey became represented with three members in the Bulgarian Parliament. A similar result followed in the local elections, when dual citizens facilitated electoral victories in 12 municipalities as well as the election of 695 local municipality council members and advisors.¹⁷ This cross-border electoral policy reached its peak during the parliamentary elections in June 2005. MRF attracted 40,656 voters from Turkey. This is 53 per cent of the total vote cast abroad. Organised under the tense anti-Roma and anti-Turkish nationalist atmosphere in Bulgaria, the 2005 elections brought the highest vote MRF reached in its history.¹⁸

2. Dual Citizens’ Voting: Cross-border Politics for Social Rights

One of the main reasons for the varying degrees of political participation of the Bulgarian and Turkish voters abroad was the different expectations of the two diverse categories of voters. Compared to the economic migrants in the Western countries, the dual citizens were primarily former refugees. They had previously lost rights in Bulgaria. For these reasons, the elections had a very practical function for the Turkish migrants in Istanbul. First, they were expected to bring a solution for the enduring social problems of the migrant community. Moreover, electoral participation symbolised responsibility toward migrants’ past, present, and future. The option of political participation would keep the door open for returning. An exercised vote meant a say in preserving the centuries-old graves of family ancestors, the birthplaces, and cultural and religious heritages. As for the future, the ballot could mean retirement and burial at the place of birth in Bulgaria. For the present day, electoral participation served as an option to refresh a once lost identity, surrounding, and even

¹⁶ ‘Elections Abroad’, *Sofia News Agency* (11 November 2001), available at <<http://www.novinite.com/archives.php>>, accessed 15 May 2004.

¹⁷ ‘HÖH Oyların Üçte Birini Deliorman’dan Aldı...’, *Balkan Sentezi* 1:12 (December 2003), p. 1.

¹⁸ For the electoral results see <<http://www.2005izbori.org/results/1-32.html>>, accessed July 2005.

life. The elections offered an opportunity to visit old memories, places, estates, friends and relatives and to do some cheap shopping for missed tastes and foods. In short, the elections offered an option for return.

On the other hand, the elections were 'the moment' the migrant associations in Turkey expected. The associations called on the migrants to put pressure on the MRF and elect representatives that might bring unresolved problems to the agenda of the Bulgarian parliament, and they provided free transportation and speeded application services. Some MRF supporters in Turkey volunteered in organising a cross-border electoral campaign.

From a kind of excitement and ethnic mobilization at the beginning, the elections soon turned into a question of equal rights and treatment. Holding Bulgarian identity 'Lichna Karta' in their hands, the migrants expected an agreement similar to the one signed for the social rights of Bulgarians working in Germany. However, following the parliamentary mandate, the migrants found their problems and demands unsolved. Since 1999, about 35,000 dual citizens succeeded in getting retirement as Bulgarian citizens and seemed satisfied with a salary of 50 euros, which is less than 1/5th of the retirement salary needed for an affordable standard of living in Turkey. For the migrants above the age of 60, who actually spent their 25–30 effective years in Bulgaria, this kind of retirement was a catastrophe. They were not able to get retirement in Turkey by working the required minimum of 10 years, because they were not in a situation to afford, or even find, any employment in Turkey. Certainly they received assistance under municipal social assistance programs in Turkey, but for a person who had worked 30 years with an expectation of living a quiet retirement, it constituted a kind of psychological trauma.

After the Bulgarian Law for Social Security and Retirements of January 2002, the situation worsened.¹⁹ According to the new point system (Article 68), the minimal criteria for retirement were raised to 30 years employment and 60 years of age.²⁰ As a consequence, around 50,000 migrants who had worked about 10 to 25 years in Bulgaria and planned to receive retirement in Bulgaria as Bulgarian citizens were left to wait until the age of 70 or more in order to benefit from the retirement

¹⁹ 'Emekli Aylıklarında Sıkıntı Bitmiyor', *Balkan Sentezi* 2:13 (January 2004), p. 3.

²⁰ 'Zakon za Pensiite: Pensii za osiguritelen stazh i vuzrast', DV br. 1 (2002), available at <www.noi.bg>, accessed 14 June 2002.

taxes paid in Bulgaria. So, contrary to the claims of the Bulgarian nationalists, the vote of the dual citizens in the 2001 elections, at the very last analysis, did not grant the dual citizens an advantage. The votes cast for MRF did not fulfil the concrete expectations. In this case, for the dual citizens, there was no obvious difference in voting for any Bulgarian party or MRF. The impression left was a misuse of their political power by MRF and migrant associations. Sometimes the leaders of the other national parties in Bulgaria, especially the Union of Democratic Forces, visited the migrant districts in Turkey and called for further migrants' participation in Bulgarian economic and political life. In the end, electing members of parliament (MP) from within the dual citizens to represent them in the Bulgarian parliament offered a hopeful option.

3. Dual Citizens' Extraterritorial MPs: Separatism vs. Peaceful Solution

Following the disappointments encountered during the last two elections, the migrant associations appealed for migrant candidacies at local government levels or in the Bulgarian Parliament itself. They argued that only 'real' representatives of the dual citizens, i.e. migrants in Turkey, could manage their social problems. This was a further appeal for equal political participation of dual citizens: the use of the right to serve as a representative and the right for independent choice among the alternatives.²¹ In 2003, the Simeon and MRF coalition proposed a revision to allow Bulgarian nationals with a foreign passport the right to run for the posts of prime minister, president, and parliament speaker, but it raised a great deal of controversy and protests.²² The society already had gotten used to former 'dissident' politicians with dual citizenship who returned after November 1989 and received ruling posts in the Bulgarian bureaucracy; however, as the recent discourses show, the problem seemed to emerge when some dual citizens with non-Bulgarian origin intended to apply for parliamentary membership or ruling posts in the local governmental structures.

²¹ About those political rights see: Bendix, *op. cit.*, pp. 112–122.

²² 'Double Citizenship Holders Might Be Allowed into Governance', *Sofia News Agency* (27 May 2003); 'Investments of BGN 600,000 Secure Bulgarian Citizenship', *Sofia News Agency* (3 July 2003), available at <<http://www.novinite.com/archives.php>>, accessed 15 May 2004.

Together with the nationalist pressure from below, dual-citizen representatives raise other political problems as well. The forthcoming Bulgarian membership in the EU will create a new situation where dual citizens will have the citizenship of a third country and thus may lose their right to vote in the local elections. This will mean a curtailment of basic civil rights, and thus it may create some discontent in the migrant community. Recent rumours on forthcoming restrictions regarding the voting rights of dual citizens started to generate tension within the migrant circles.²³ The reaction may be similar to the one when the Bulgarian government ceased to give Bulgarian tourist passports to dual citizens in Turkey a few years ago.²⁴ It was strongly expected that before the 2005 elections, a new amendment considering the priority of effective citizenship would be put into force.²⁵ It would require six-month residency as a precondition for the right to vote. The Associations of Balkan Turks criticized these intentions and argued that they have property, investments, and relatives in Bulgaria for whom they feel responsible. They argued these restrictions are designed to limit the Turkish migrants' political participation, and they would not be applied to the double citizens with Bulgarian origin residing in Germany, the U.S., Moldova, and Macedonia.²⁶ In the end, though, there was not any change in the dual citizenship policies; the fear of loosening Bulgarian citizenship prevailed since the nationalist opposition in Bulgaria grows stronger.

According to some Bulgarian circles, the elections also functioned as a way to reproduce the cultural identity of Turkish and Muslim minorities in Bulgaria. Furthermore, the elections predict a model of self-governance as a way for development. Being organised by the migrant associations and the representatives of minorities, the migrants' participation in the Bulgarian elections provided a ground for common action and, to some extent, facilitated the construction of a common past, collective

²³ 'Kraiat na DPS?', *SEGA* (18 March 2004).

²⁴ The passports were proceeded after May 2003 again. See: 'Nihayet Bulgaristan Kirmizi Pasaport Verilmesi Umudu Dogdu', *Balkan Sentezi* 1:4 (April 2003), p. 4.

²⁵ About effective citizenship practices see: Alexander Aleinikoff and Douglas Klusmeyer, 'Plural Nationality: Facing the Future in the Migratory World' in Alexander Aleinikoff and Douglas Klusmeyer (eds.), *Citizenship Today* (Washington, D.C., 2001), pp. 63–75.

²⁶ Interviews with the members of the Executive Council of the Association for Solidarity and Culture of Balkan Turks in Istanbul, Sultanahmet Branch, March 2004.

responsibilities, and future projections.²⁷ It triggered the construction of a cross-border self-protection mechanism involving the Turkish minority in Bulgaria and dual citizenry in Turkey, and it generated the formation of a cross-border public culture that may serve as the basis for further economic, cultural, and political mobility. A striking example at this point is the mutual interference of the minority and migrant political elites and civil groups in the elections held on the opposite side of the border.

The cross-border politics moved far away from the dual citizens' community and involved parties from both Bulgarian and Turkish sides of the border. For example, during the 2003 local elections, the leader of the Association of Balkan Turks in Istanbul accused MRF and a MRF parliamentarian representative of interfering in the local elections in Edirne, a city on the Turkish side of the border.

In conclusion, bearing in mind the associations' intentions for migrant representatives in the Bulgarian parliament, we may say that elections opened a way for substantive formation of a de-territorialised sphere of politics between Bulgaria and Turkey. Moreover, held under the guidance of the associations, the elections offered new opportunities for collective action and stimulated individual participation and awareness of the rights and new opportunities. They caused a re-codification of the citizenship rights and duties, and they provoked further reassessment of the unified principle of loyalty with the divided one. According to nationalist circles in Bulgaria, the political aspect of the multiple character of migrants' national belonging, when associated with a reference to territorialities, challenges the national identity in Bulgaria and gives birth to a separated trans-territorial formation mobilised in a cross-border social space.

The post-1989 cross-border developments between Bulgaria and Turkey show that interaction between cross-border actors, such as migrant associations, twin municipalities, minority parties, and local governmental structures in cross-border elections and economic links, may extend beyond into a new kind of extraterritorial social space based on dual citizenship rights, responsibilities, and participation. This dual structure may develop as a basis for further development of cross-borderness and lasting interdependency between two countries. Or, it may be pulled back into the arms of the nationalist circles on the two sides of the border. So,

²⁷ 'Bu Demokrasi Sınavını Başarıyla Geçmeliyiz', *Balkan Sentezi* 1:10(October 2003), p. 1.

in contrast to the general opinion of the nationalist circles, it may not necessarily refer to pretensions for a dominant cultural sphere with the prospect of developing into a public sphere of a territorial entity. On the contrary, these kinds of extraterritorial links may serve as a ground for further economic and cultural cooperation and exchange, thus facilitating the end to historical prejudices and lasting solutions for likely minority problems. These two conflicting approaches on the cross-border function of the elections had immense impact on the formation and development of the national citizenship policies in Bulgaria and Turkey.

IV. Bulgarian and Turkish Dual Citizenship Policies: Search for a ‘New’ Status of Dual Citizenship —Differentiated vs. Universal

There was an obvious difference in the Turkish and Bulgarian approaches on the appropriateness of dual citizenship between the two countries. For Turkey, it was a rare cure for healing the problems of all involved parties. In Turkey’s view, dual citizenship was a compromise for Bulgaria to avoid extra financial burdens that might further harm its economy and political stability. It was also an option for the migrants to return to their surroundings and an opportunity for Turkey itself to relieve the growing social and political pressure of the migrant community. Nevertheless, for Bulgaria dual citizenship was a double-edged sword. While the migrants did relieve unemployment pressure on the already burdened social budget, it was also a significant political trump for the nationalist circles in Bulgaria, who envisioned possible separatist scenarios on the side of Turkey.

1. Bulgarian Dual Citizenship Policy: From Domestic Politics to National Kin Renovation Policy

In Bulgaria, the elections have been referred to as a tool for creating a cultural sphere stretching over two countries and cultural identities, thus linking the minority in Bulgaria to its ‘motherland’ (i.e. Turkey). The elections therefore developed into a pretext for ‘national’ mobilization for some ethnic majority elements who argued that national identity was

under threat.²⁸ According to some majority members, the Turkish migrants were given extended *functional representation*²⁹ though they are *de facto* excluded former citizens. Moreover, they are citizens of a historical occupier and tyrant. Furthermore, as former citizens, they were likely to know the qualifications of ‘proper membership’ and therefore were expected to fulfil their duties in the ‘proper’ way, i.e. to defend and serve Bulgarian national interests. From that point of view, there was no problem until the first voting results raised the question of loyalty and rights of the dual citizens. Because the dual citizens voted for MRF, not for any Bulgarian party representing the ethnic majority, such questions arose as: ‘Was it loyal to vote for a party considered as a “snake in the arms of Bulgarian democracy”³⁰ or “the fifth column” of (as usually referred to) a “historical rival” state, i.e. Turkey?’ For the nationalists, those dual citizens who voted for MRF were not loyal towards Bulgaria and violated the ‘proper’ ethical mandates of the national authority.

Dual citizenship, therefore, caused numerous protests in Bulgaria. At the very beginning, the disputes were grounded in the political dissidents’ dominance in the Bulgarian political arena. Former BKP followers in particular viewed the accommodation of dual citizenship as a privilege allowing the former dissidents to return. The opponents of dual citizenship claimed that loyalty can be only singular, while the recognition of dual citizenship gives people with foreign citizenship an opportunity to rule irresponsibly over the Bulgarian resources and benefit unjustly from ‘the national goods produced by the hard work and patience of the Bulgarian nation.’³¹ The anxiety escalated after the extraterritorial ‘electoral victory’ of MRF, and dual citizenship fell under frequent attack of being a launch pad in the service of the ‘great powers’ as well as a tool for Turkey’s

²⁸ The anti-Turkish electoral propaganda of the nationalist formation ATAKA in Bulgaria was based on these arguments during the June 2005 elections, in which ATAKA reached 9 per cent of the national vote. See: <<http://www.2005izbori.org/results/index.html>>, accessed July 2005.

²⁹ This refers to group-specific activities or rights and duties and includes ethical rules and obligations designed in the frame of what is proper for the state.

³⁰ In that way the former Prime Minister Kostov called MRF. See: ‘Kostov dava zaden za DPS, no ne i za Dogan’, *SEGA* (4 May 2004).

³¹ Milko Boiadzhiev, ‘“Vunshnite” Pensioneri na Bulgariia’, *NIE Monthly* 2 (2001) <http://members.tripod.com/~NIE_MONTHLY/nie2_01/pensioneri.htm>, accessed 14 May 2004. <http://members.tripod.com/~NIE_MONTHLY/nie2_01/pensioneri.htm>, accessed May 14, 2004.

influence in Bulgaria. In this way, the previous target of the offences shifted from former political dissidents to MRF, Turkey, and Turkish migrants in Turkey. This reorientation of public opinion was favoured because it could shift public attention from the growing economic and social problems to Turkey-centred nationalist agendas, thus reducing societal pressures on political leaders. This gives clues for the development of dual citizenship for domestic political purposes.

Dual citizenship aggravated negative prejudices about the Turkish minority, its political representation, the migrant community in Turkey, and finally Turkey itself. Furthermore, by feeding nationalist circles, the dual citizenship policy of the Bulgarian governments to a certain degree weakened those promoting trust and cooperation between Bulgaria and Turkey. Nevertheless, according to Bulgarian politicians, the accommodation of dual citizenship served well to arrange a more modern and ‘Westernised’ face for demonstration in the front of the ‘capricious’ EU.³² Moreover, according to foreign policy decision-makers, it also opened a channel to maintain the national consciousness and active ethnic, political, and financial links with the Bulgarian diaspora in the world.

Indeed, introduced a year after the new citizenship law, the Law for Bulgarians Abroad is based on a specific ethnic definition of Bulgarian citizens abroad and thus defines a special category of Bulgarian dual citizens who are protected and assisted under this law. In general, the Law aims at clarifying the relations between the Bulgarian state and the Bulgarians abroad. The second article of the Law defines the ‘Bulgarian abroad’ as a person who has at least one relative of Bulgarian origin, has Bulgarian consciousness, and lives abroad. According to Article 3, Bulgarian origin could be proven by documents from the Bulgarian Orthodox Church or any authorised association of the Bulgarians abroad. The provisions of the second chapter describe the protection and the rights of Bulgarians living abroad and makes clear that the possession of Bulgarian citizenship is not a necessary condition for using those rights; it also notes the official protection provided by the Bulgarian consulates worldwide. The third and fourth chapters set down the privileges of non-citizen Bulgarians during their stay, visit, study, or work in Bulgaria, and it enumerates the tasks of the National Council for Bulgarians Abroad.

³² Iva Toncheva, ‘Bulgaria Dreams of Distant Union’, *BBC* (11 December 2002) <<http://news.bbc.co.uk/1/hi/world/europe/2533863.stm>>, accessed May 14, 2004.

The use of this Council's financial resources, as well as the state budget delivered for it, is framed under the provisions of the final chapter.³³ The implementation of this Law is monitored both by the National Council and the state-funded Agency for Bulgarians Abroad.

This law established Bulgarian kin minority protection policy and converted dual citizenship from a primarily domestic policy into an engine of intensive nation building policy. An important example for the nation building function of the dual citizenship policy is demonstrated in the Bulgarian policy concerning Macedonian applications for Bulgarian citizenship. The citizenship policy applied to Macedonian applications was the subject of a *de facto* compromise with the nationalists. As a result of this political shift, many nationalist Bulgarians now agree that the intensive Bulgarian emigration and its demographic consequences require at least an accommodating approach in citizenship policy. Yet, this tolerance has an intensively relative character. When mentioned for the migrant community in Turkey, dual citizenship status persists in being a subject of political debate, while in the cases of Macedonian applications it does not create problems. In other words, the accommodation of the Macedonians as Bulgarian citizens has a special historical importance in the building of the new Bulgarian nation. In nationalist circles, it is perceived as a historical return of the Macedonians to their 'first' origin, i.e. the Bulgarian one.

As understood from the application procedure, the Macedonian applications are handled under the provision of Article 13 for applicants with Bulgarian origin. Among the initial set of application documents are a declaration of having Bulgarian self-awareness and a certificate of Bulgarian language.³⁴ This procedure shows that one reason that forces the Bulgarian government to admit citizenship applications from Macedonian citizens is its perception of Macedonian ethnicity, and a second is related to its demands for recapture or compensation of Bulgarian estates in Macedonia.³⁵

³³ 'Zakon za Bulgarite, Zhiveeshti Izvun Republika Bulgariia', Obnarodvan DV br. 30 (11 April 2000), pp. 1–7. Available at <<http://www.legiswatch.org/minorities.php>>, accessed 14 May 2004.

³⁴ 'Mostly Macedonians Push for Bulgarian Citizenship' *Sofia News Agency* (13 February 2004), available at <<http://www.novinite.com/archives.php>>, accessed 14 May 2004.

³⁵ 'Vraќanje na imoti od Makedonija na bugarski drճavjani', *A1 Televizija* (Skopje, 28 September 2001) <<http://www.a1.com.mk/vesti/vest.asp?VestID=2549>>, accessed 13

On the other hand, some Macedonian circles are interested in the situation of Macedonians in Bulgaria. Their political organization, OMO 'Ilinden',³⁶ tends to raise anxiety in Bulgaria because of the implications of the mentioned dual citizenship practices. Unofficial statistics show that the number of Macedonian citizens holding Bulgarian citizenship has reached 20,000,³⁷ which for OMO 'Ilinden' may mean 20,000 supporters. Still, for Bulgarian dual citizenship policy, the case of Macedonians, who are Slavic Orthodox, is not as important as the case of its former citizens of Turkish origin. Based on the Ottoman past, the conceptualisation of Bulgarian nationalism is rather inclusive concerning the Slavic Orthodoxy in the Balkan region.

Some authors argue that the new nationalism is more exclusive in its approach to citizenship than a more inclusive former state-building nationalism.³⁸ In general, Bulgarian dual citizenship combines both inclusive and exclusive characters in a selective manner. Similar to other kin minority laws in the region, the Bulgarian kin minorities abroad seem honoured with additional rights and opportunities that are not easily provided to citizens with non-Bulgarian origin. For example, one of the main activity areas of the Agency for Bulgarians Abroad is the community of Besarabian Bulgarians and Bulgarian minorities in Serbia, Moldova, Romania, and Tatarstan. Similarly, the financial and social policies toward the Bulgarian speaking Pomak community in Rodopa region in southwest Bulgaria and the approval of Macedonian applications show the selective inclusiveness of the new Bulgarian national citizenship. The vivid emphasis placed on the mother tongue and ethnic heritage reflects the protection of Bulgarian national citizenship. The spectacular opening of new schools and financial privileges given to these communities, compared to the relatively guarded approach toward the dual citizens in Turkey, also demonstrate the differentiated approach in the modelling of the new Bulgarian national identity.

On the other hand, Bulgaria presents an interesting example for a temporary calming of state nationalism under the pressure of EU norms

October 2003.

³⁶ Suzana Taseva, 'Makedoncite vo Bugarija se obedinija', *AI Televizija* (Skopje, 6 April 2003) <<http://a1.com.mk/vesti/vest.asp?VestID=18722>>, accessed 13 October 2003.

³⁷ 'Mostly Macedonians Push...', *loc. cit.*

³⁸ For example, see: Gerard Delanty, *Citizenship in a Global Age: Society, Culture, Politics* (Buckingham, 2000), pp. 95–97.

and requirements. This is accompanied by considerable growth of nationalism from below as a reaction to the pro-EU dependency and perceived clumsiness of the statesmen. It might be worth mentioning that the last presidential elections in Bulgaria selected a left-wing president with an obvious pro-Slavic and pro-Orthodox approach and who is concerned with the intentions and demands of the nationalist circles in Bulgaria. For instance, one of his first activities was related to a visit of the Orthodox Church in Moscow followed by a public appeal for property compensations for Thracian Bulgarians (Bulgarians who left the Bulgarian ‘motherlands’ in Eastern Thrace during the Balkan wars in 1912–1913). His statements represented the demands of the nationalist and anti-Turk Associations of Thracian Bulgarians, which claimed three million dollars in property compensation for 50,000 Thracian Bulgarian refugees from Eastern Thrace forced to leave their estates at the time of the Balkan wars.³⁹ Both the President and the Minister of Social Security, Mrs. Shuleva, brought the issue to the agenda of the Turkish-Bulgarian meetings, seeking incorporation of the problem in with the social demands of Turkish migrants.

This shift caused an instant reaction on the side of the Associations of Balkan Turks, which initiated a common symposium of migrant associations in Istanbul. The final declaration of migrant associations drew attention to their basic citizenship right to social retirement in light of the decades migrants spent working for Bulgarian agriculture and construction, and it emphasised that these kinds of nationalist historical demands cannot be bargained in return for their just retirement demands. The Associations underlined that they never considered asking, as the Thracian Associations do, for compensation of the whole property, health, and social compensation of two million Turkish migrants forced to leave their lands in Bulgaria during the last century, a demand that may cost many times the recent Bulgarian treasury itself. Instead, they only want to be paid the retirement that they have already worked for and paid for in the form of social taxes. They warned that after waiting for 13 years, they soon would come to the point of applying to the European Court for Human Rights.⁴⁰

³⁹ Todor Kosatev, *Trakiiskiiam Vupros vuv Vunshnata Politika na Bulgariia 1919–1923* (Sofia, 1996), p. 15.

⁴⁰ ‘Sosyal Güvenlik Haklarımız İçin Bulgaristan Cumhurbaşkanı Georgi Pırvanov’u

After this declaration reached the Bulgarian public in 2001, the dual citizens were accused of disloyalty, infiltration, hostility, and greediness. They were reminded of the wealthy conditions that they enjoy in Turkey, in contrast to the poverty and patriotism of the ‘real citizens’ in Bulgaria, who ‘sacrifice their lives for the prosperity of the country’. The claims went further and the dual citizens of Turkish origin were proclaimed invaders who aim to selling the national land and take control of the political authority as well as traitors who try to hobble the Bulgarian way to EU.⁴¹

It was widely concluded that dual citizens with Turkish origin most likely reflect the interests of Turkey and are therefore organised and controlled by the Turkish state. Although right on some points, these approaches failed to take into consideration the post-Cold War change in the orientation and preferences in Turkish kin policy as result of internal problems with its own ethnic minorities, particularly the ethnic tension caused as a result of the conflicts with the Kurdish Workers Party in Southeastern Turkey. Similarly, the changing role of important cross-border actors, such as migrant associations, twin municipalities, and political parties and the shift in the orientation of Turkish kin policy toward kin minorities in the EU are all important variables in the formation of Turkey’s kin policy preferences that require particular attention.

2. Turkey’s Dual Citizenship Policy: From a Unique Privilege for the Nationals to a ‘Universal Cure’

Turkey’s kin policy demonstrates a noticeably different discourse and practices from Bulgaria’s. As elaborated in the previous chapter, Bulgarian kin and dual citizenship policies are apparently state-initiated, normatively institutionalised, and functionally organised. They are not

Uyaracağız’, *Balkan Sentezi* 1:10 (October 2003), p. 3.

⁴¹ These are well known phrases one may easily get from newspapers published on <www.dir.bg> and <www.mediapool.com>, also from internet chat groups etc. As a member of the migrant community I have opportunity to observe and receive information from the migrants traveling to Bulgaria, as well. My information is also based on personal contacts and interviewing with average Bulgarians, members of Thrace Associations, migrants, members of Turkish minority, and representatives of NGOs in Sofia during my research for this paper (Sofia, 17–24 June 2004).

restricted by factors such as the EU, the potential negative reaction of the major domestic minority, or neighbouring countries with a large Bulgarian minority and sensitive nationalist feelings. In contrast, Turkey has to take into consideration the instability and the historic anti-Turkish feelings in its neighbourhood (Middle East, Caucasus, Bulgaria and Greece). It had to cut down the resources spent for the kin abroad in order to increase the financial assistance sent to the underdeveloped districts in Southeastern Turkey. The launch of the long-lasting National Project for Development of Southeastern Anatolia (GAP) has particular importance for further socio-economic integration of these ethnically diverse (Kurds, Arabs, Assyrians, Afghans etc.) districts with the western developed regions of the country. The recognition of the historic ethnic diversity in Turkey also strengthened notions of civic citizenship in the country and lowered its previous interest toward kin abroad.⁴²

As a result, Turkey developed a fuzzy⁴³ kin policy, which was shaped under the guidance of numerous political and civil actors from home and abroad, such as migrant associations, ethnic minority NGOs, twin municipalities, MPs, parliamentary commissions, business councils, twin parties etc. The role of NGOs increased greatly, especially during the second half of the 90s.⁴⁴ State support that had been provided to some ‘strategic’ migrant associations until the early 90s was withdrawn, and the states’ function toward the kin was left within the framework of consultation and coordination. This function is not normatively structured and its execution is the duty of the High Council of Nationals Abroad.

Established in 1998, the Council became a consultation and meeting centre for the kin minority and migrant NGOs at home and abroad. In general, the Council was supposed to cover three main groups of communities that hold extraterritorial ties: 1) Turkish citizens living abroad, such as Turkish citizens in Germany; 2) immigrant communities

⁴² Erhan Basyurt, ‘Dış Türkler ve Kürtler’, *Zaman* (5 July 2000) <<http://www.zaman.com.tr/2000/07/05/yazarlar/ErhanBASYURT.htm>>, accessed April 2002.

⁴³ Brigit Fowler uses this term in describing the fuzzy citizenship created by the Hungarian Status Law. For details see: Brigit Fowler, ‘Fuzzing Citizenship, Nationalising Political Space’, in Zoltán Kántor et al. (eds.), *The Hungarian Status Law: Nation Building and/or Minority Protection* (Slavic Eurasian Studies no. 4; Sapporo, 2004), pp. 205–214.

⁴⁴ About the role of NGOs in Turkey see: Fuat Keyman and Ahmet Icduygu, ‘Globalization, Civil Society and Citizenship in Turkey: Actors, Boundaries and Discourses’, *Citizenship Studies* 7:2 (2003).

living in Turkey, including Bosnians, Albanians, Georgians, and Caucasians; and 3) kin minorities abroad, primarily the Turkish minorities in Southeast Europe.

However, in practice the Council concentrated on citizens abroad and did not cover the other two categories. Each of these communities holds different expectations and enjoys a different position within the applied kin policies. So, in practical terms there are two separate kin policies based on different grounds: one is applied to kin minorities abroad, and other applied to citizens abroad. In general, kin minority policy seems more rigid in its justification, based on bilateral agreements and general principles of keeping kin minorities in their home countries, while dual citizenship policy varies in its execution within each of the mentioned three categories. Dual citizenship seems more difficult for kin minorities living abroad and some (Greek and Armenian) host-minorities, but it is considerably liberal towards migrant groups and some home-minorities (Jews, Georgians, etc.).⁴⁵ The Citizenship Law⁴⁶ and Act no. 2383, Article 22/3 recognises multiple citizenship; thus, in practice it encourages the acquisition of other citizenship. At the same time, this law limits this encouragement to citizens who lost their citizenship status because of discharge, in other words upon official permission based on decision of an authorized body (Article 26). So, Turkish nationals accused of carrying out activities against the internal and external security of the state are subject to permanent loss of their Turkish citizenship (Article 35).⁴⁷ For example, any Turkish migrant of 1989 cannot renew their Turkish citizenship in the case they lose it, due to the fact that it is not acquired by birth.

Approached in practical terms, this diversity in citizenship practices seems to reflect Turkey's foreign policy alliances and animosities as well as various security concerns. Although Turkish citizenship acquisition is normatively based on the applicants' personal will, in practice citizenship acquisition favours applicants who belong to friendly or neutral nations.

⁴⁵ Gaffar Yılmaz Katamadze, 'Saakashvili ile tarihi buluşma', *Chveneburi.NET* (14 June 2004) <http://chveneburi.net/sp/bpg/publication_view.asp?iabspos=1&vjjob=vdodid_156328>, accessed December 2004.

⁴⁶ Turkish Nationality Act no. 403, *Official Gazette* 11638 (22 February 1964), available at <www.hukuki.net>, accessed May 2004.

⁴⁷ Citizenship Act Amendment no. 2383 of 13.02.1981, *Official Gazette* 17254 (17 February 1981), available at <www.hukuki.net>, accessed May 2004.

However, at the official level, this diversification is explained by Turkey's main principle in kin minority protection policy, which aims to promote kin development within their home states' jurisprudence, especially concerning cross-border kin minorities. For instance, beside some state-provided educational assistance (quotas of university scholarships), non-citizens with Turkish origin living in neighbour countries are approached as foreigners when acquiring Turkish citizenship. For example, the acquisition of Turkish citizenship is guaranteed through immigration visas for Macedonian Turks while dissuasive for Bulgarian or Greek Turks. This practice is in contradiction to the regulations for implementing the Citizenship Law, which provides a privileged acquisition for applicants with Turkish ancestry.⁴⁸

However, these regulations are fully employed through the Law 4112/1995, which inaugurated the 'Pink Cards' to preserve the economic, cultural and social rights of citizens at birth who lost their Turkish citizenship with permission (Article 29). This provision is aimed at preserving the citizenship status of Turkish migrants in Germany by providing a status of denizen. After the 1996 changes in implementation, the Law started to promote privileged and fast restoration of lost citizenship for Turks who had to relinquish their citizenship when obtaining a German one.⁴⁹

In accordance with Article 66 of the 1982 Constitution, the Citizenship Law does not contain a particular provision for citizenship renewal for applicants with non-Turkish ancestry. Article 66 considers every person tied to the Turkish state with the bond of citizenship as a Turk, and it does not differentiate between citizens according to their ethnic or religious origin.⁵⁰ Because of this, Turkey's dual citizenship

⁴⁸ About the role of ancestry in Turkish citizenship acquisition see: Baskin Oran, *Türkiye'de Azınlıklar* (İstanbul, 2004), pp. 87–89.

⁴⁹ 'Başbakan A. Mesut Yılmaz'ın TBMM ANAP Grup Konuşması' (21 May 1996), available at <www.anap.org.tr>, accessed December 2004. However, this process was interrupted by Germany and 110,000 Turks with dual citizenship were deprived of German citizenship. See: Yücel Özdemir, 'Çifte vatandaşlık yanıyor', *Evrensel* (7 November 2004), available at <<http://www.evrensel.net/04/11/07/politika.html#ust>>, accessed December 2004.

⁵⁰ However, the condition of *jus soli* encourages personal initiations for naturalisation of expatriates who are victims of forced migration. There is not provision that differentiates between the Turkish citizens belonging to ethnic minorities and ethnic majority.

policy turns into a policy employed primarily to Turkish citizens living abroad, immigrant communities at home, or home-minorities that keep active ties with their kin-states, such as Georgian, Caucasian and Central Asian ethnic minorities. In short, dual citizenship is a status allowed to all Turkish citizens plus former citizens who lost their citizenship with permission from the Turkish authorities.

Furthermore, in contrast to the kin minority policy established under the guidance of bilateral agreements signed by the Kemalist Republic,⁵¹ the newly developed dual citizenship practices show the ambiguous nature concerning different categories of migrants and ethnic minorities. In its most basic terms, Turkish dual citizenship policy aims at different outcomes when applied to emigrants and to immigrants. For either of the categories, it aims at protection of the kin abroad. However, when applied to the immigrants of Turkish origin, it seeks for prevention of kin minority immigration, whereas applied on Turkish emigrants, it tries to preserve their citizenship.

This diversification in the practices reflects the status of these two categories as well. Emigrant communities seem to be placed under the coordination of the Council. The Council seems appointed to deal chiefly with consultation of kin minorities and migrant communities abroad. The coordination and information functions in regard to the immigrant communities and ethnic minorities in Turkey seems left to local offices established within the governorships and tied to the Ministry of Internal Affairs. However, this structure is not that simplified. The transnational and embedded composition of the kin abroad leads to complex interaction and exchange between the numerous civil societies linked to these two structures.⁵²

Within this multifaceted structure, any analysis of Turkey's approach toward Bulgarian Turkish migrants with dual citizenship requires

⁵¹ Significant agreements are the Lausanne Agreement of 1923 and the Agreement for Good neighbourhood with Bulgaria of 1925. Available at <www.mfa.gov.tr>, accessed December 2004.

⁵² The case of Turkish migrants from Greece constitutes a particular case which links 5 associations and one confederation representing Western Thrace Turks in EU countries such as Germany, Belgium and Holland with nearly 10 local associations in Turkey, and 4 Turkish associations in Northern Greece. There are about 700 associations representing 2,600,000 Turks in Germany. See at: 'Başbakan A. Mesut Yılmaz'ın TBMM ANAP Grup Konuşması', op. cit.

differentiating between the statuses of the Bulgarian Turks as a kin minority with status established under the arrangement of the Joint Protocol of the Agreement of 1925 and their expatriate communities in Turkey. As already mentioned, Turkey's dual citizenship status favours expatriates in Turkey as being Turkish citizens, while it does not embrace the members of kin minorities abroad. So, the kin minorities in the Balkans are treated under the provisions of foreigners with Turkish ancestry, a status that enjoys some educational and cultural privileges in Turkey. Yet, these privileges do not extend to a quota-based right for university education and sponsorship in cultural initiatives.⁵³ In the end, this double structure in dual citizenship policies protects the Bulgarian citizenship bond of the kin minority in Bulgaria, while simultaneously solves the social and economic problems of the migrant community in Turkey. Moreover, it creates an option for return back to Bulgaria.

On the other hand, as mentioned above, there is a complex societal interconnection between these two communities: the Turkish minority in Bulgaria and the migrants in Turkey. This interaction develops independently from the state policy via NGO's activities on both sides of the border. In contrast to general impressions, this interaction is not complementary; on the contrary, it is rather competitive. Some recent examples show that the main interests and expectations of these communities, as well as their organizational structures, differ from each other. Therefore, their interrelations tend to develop more tension between each-other than before. State policy is also important here, because the continuity of peaceful neighbourhood relations with neighbouring states is closely related to successful moderation of these two communities at home and abroad. Accordingly, while the kin minority in Bulgaria is under the competence of the Foreign Ministry, the Turkish immigrants from Bulgaria, as the ones from Yugoslavia, Greece, Caucasian, and Asian Republics, are under the coordination of the municipal offices and Ministry of Internal Affairs.

⁵³ Each year the Turkish Ministry of Education provides scholarship for bachelor and master education to 400 students from former socialist republics. The selection is based on kinship and historical friendship and affiliation between nations. For instance, Albanians, Bosnians, Ukrainians, Georgians, Macedonians, Croatians, Moldavians, and citizens of the Caucasian and Middle Asian republics are some of these favored nationalities.

This differentiation became necessary after the massive immigrations during the 50s and 60s. In light of these former experiences, after the ‘Great Migration’ began and thousands of refugees entered Turkey in June 1989, the Governor of Istanbul established an Office for Migrant Issues within the building of the Governorship of Istanbul. This office has been appointed to deal with the social, legal, and political problems of kin immigrant communities in Turkey. For practical reasons, since then this Office generally keeps close contact with the migrant associations. In principle, it is supposed to keep equal distance to all associations; while most of the associations compete in developing close personal links with its public servants. For this reason, the relations between these two groups are not clear in practice. When approached from the standpoint of the Office, the Office seems equally open to all the complaints and accusations of the migrant society.⁵⁴ Migrant associations, though, usually tend to hide their clumsiness and blame the Office, especially when faced with an unsatisfied demand for additional assistance or unresolved administrative problems.⁵⁵ This is especially true for immigrant associations of Bulgarian Turks, which represent most of the migrants and refugees that came from the Balkans during the 20th Century. Their continuous and uncoordinated complaints, discontent, and demands not only lead to tense relations with the Office, but also unnecessarily aggravated public tensions on both sides of the Bulgarian-Turkish border that often find reflection in the official Bulgarian-Turkish agenda.

In short, the extraterritorial elections require an approach that overcomes the state centric explanations that were extensively valid during the blocks system of the Cold War period. This is particularly true in the case of Turkey. In general, Turkey approached the migrants’ participation in the extraterritorial elections, held for the first time in 1997, as a democratic process that promised further economic, social, and political contacts and closer relations with Bulgaria. The political participation could lead to relief of social problems and the calming of some problems on the northern border. Occupied with the problems on its southern and eastern borders because of the wars in Iraq and Afghanistan,

⁵⁴ ‘Dernek Yöneticisi olarak Sıkıntılarımız’, *Balkan Sentezi* 1:2 (February 2003), p. 3.

⁵⁵ Interviews with the leaders of Associations of Balkan Turks and Association of Rumelian Turks, Istanbul, April–May 2004.

the Iranian policy, and Kurdish military groups in the Syrian north, Turkey seems to leave the migrant problems to civil actors.

Indeed, being their first experience, the Bulgarian elections attracted migrants' attention. The general participation was high; yet, the vote of the migrants in these first elections remained very limited. Left in a situation to wait for hours under unhealthy weather conditions, lots of migrants did not succeed in casting their votes. There were only 4 polls provided at the Bulgarian General Consulate in Istanbul for the approximately 30,000 dual citizen voters in Istanbul. This election was a first experience for both migrant associations and the Bulgarian consulate, yet the migrant associations complained that the real intention of Bulgarian officials was to limit the migrants' vote as much as possible. They directed their complaints toward Ankara and claimed that there were not sufficient poll stations. Furthermore, they said the Bulgarian General Consulate officers intentionally tried to slow down the voting process. For these reasons, the associations involved the Office for Migrants in the next elections in 2001. The role of the Office was to assist the organization of the elections in coordination with the Bulgarian consulate and provide conditions for setting up additional polling stations in migrant areas in Istanbul, Bursa, Izmir, and Edirne.⁵⁶

The associations themselves organised electoral campaigns that in reality appeared more like self-advertisement campaigns. The elections provided an opportunity to attest that the associations work for the benefit of the migrant dual citizens. This was also an occasion for registering new members. When evaluated together with the MRF's campaign for electoral participation in Turkey, the elections leave the impression of extraterritorial politics by MRF on one side of the border and migrant associations on the other. A recent example of this cross-border cooperation is a speech the MRF's MP Ahmet Hüseyin delivered to members of the Association for Solidarity and Culture of Balkan Turks in Yalova. In his speech, the MP recalled the approaching elections and urged the dual citizens in Turkey to keep alive their common responsibility toward political developments in Bulgaria, and vote for their future as Bulgarian citizens and the future of their relatives in Bulgaria. He called all migrants to renew their Bulgarian citizenship and

⁵⁶ '24 Polling Stations to be Opened in Turkey', *Sofia News Agency* (6 November 2001), available at <<http://www.novinite.com/archives.php>>, accessed 15 May 2004.

guard their rights in Bulgaria by casting their vote in the 2005 elections.⁵⁷ It is worth mentioning that this speech was met with questions about the MRF's inconsistency concerning unresolved social problems. The voters' tone predicts a significant drop in the MRF's previous electoral success in Turkey in future Bulgarian elections.

As this short overview shows, the case of extraterritorial Bulgarian elections in Turkey has little to do with any decisive Turkish role in dual citizens' voting, at least until now. The official decision-makers seem aware of the cross-border political manoeuvres of both the associations and MRF.⁵⁸ It is also obvious that the government will face higher pressure for further support in the next elections. However, the recent changes in Turkey's official dual citizenship policy toward the migrants of 1989 shows that Turkey's intervention may be available only when local politics significantly complicates bilateral relations with Bulgaria.

An essential justification for this relative lack of interest would be based on its opinion that dual citizenship is a universal key for numerous problems related to Turkish citizens abroad,⁵⁹ and they have to be taught to exercise their rights on their own. This is also in accord with Turkey's contemporary perception of kin minority protection guaranteed in the country of residence. In contrast to the policies during the Cold War, this new approach excludes emigration as a way of solving minority problems. But it also excludes the previously all-encompassing assistance and guidance. It is more than true that previous unnecessarily protective kin policies prevented the development of means of minority self-protection, such as intellectuals, minority NGOs, and parties representing and voicing the problems of the kin minority in Bulgaria, including adherence to international norms. In this view, the new Turkish kin policy towards kin minority in Bulgaria aims at promoting their societal self-development,

⁵⁷ 'DPS Milletvekili Ahmet Hüseyin: Çifte vatandaşlık ihmal edilmemeli', *Bulgar-Türk Haber Ajansı* (11 November 2004), available at <<http://www.bg-turk.net/>>, accessed December 2004.

⁵⁸ Interviews with officials in the Advising Office of the Prime Ministry, Ankara, April 2004.

⁵⁹ CHP İstanbul Milletvekili Onur Öymen, 'Yurt Dışında Yaşayan Vatandaşlarımızın Sorunlarının Araştırılarak Alınması Gereken Önlemlerin Belirlenmesi Amacıyla Verilen Meclis Araştırma Önergesinin Görüşülmesi Hakkında Konuşma', *TBMM Genel Kurul Tutanagi* (15 April 2003), p. 3. Available at <www.onuroymen.com.tr> or <www.tbmm.gov.tr>, accessed December 2004.

relative pluralism, and democratic consolidation. This social development could serve as a stable ground for a kin minority self-protection mechanism based on international norms for minority rights.

In fact, there is historical justification put forth in support of this shift in the Turkey's kin policy. At the beginning of the century, the Ottoman Empire and the Kemalist Republic overcame 50 years (from 1878 until 1922) of massive wars against Western imperialist powers. The last and the most exhausting one was the national liberation war against the West coalition. These wars caused enormous loss in the male population, leaving behind an aged and mainly female population. For this reason, Turkey's kin policy at that time was primarily oriented toward attracting Muslim populations from the Balkans and Caucasus regions. After the 1940s, this policy changed and the immigration of kin minorities was approached as additional economic and social burden on Turkey's underdeveloped economy. Moreover, the Cold War migrants were usually refugees expelled because of state policies applied in Bulgaria or the Former Yugoslavia. Thus, they needed financial resources, employment, housing, and social assistance. Since the early 1960s, Turkish kin policy has been based primarily on the principle of preventing any massive influxes of migrants and refugees, thus avoiding spontaneous increases in the country's unemployment rate.⁶⁰ Furthermore, the protection of the Turkish kin minority in its historical homeland, i.e. Bulgaria, would also guarantee the protection of its Ottoman and Turkish history, cultural presence, and heritage in the Balkans.⁶¹

One additional point is that especially during the last decade, Turkish decision-makers became aware of, and concerned about, the impeding role of anti-Turkish feelings in the region. These feelings create one of the hardest obstacles limiting Turkey's active economic and political presence in regional initiatives in both the Mediterranean and Black Sea regions. For this reason, in its official policy Turkey seems to keep a distance from some radical nationalistically oriented associations and communities in

⁶⁰ For details see: Nurcan Özgür, *Devlet Dış Politikası açısından Göç Olgusu: Yugoslavya'dan Türkiye'ye Arnavut Göçleri* (Yayınlanmamış Doktora Tezi; İstanbul, 2003).

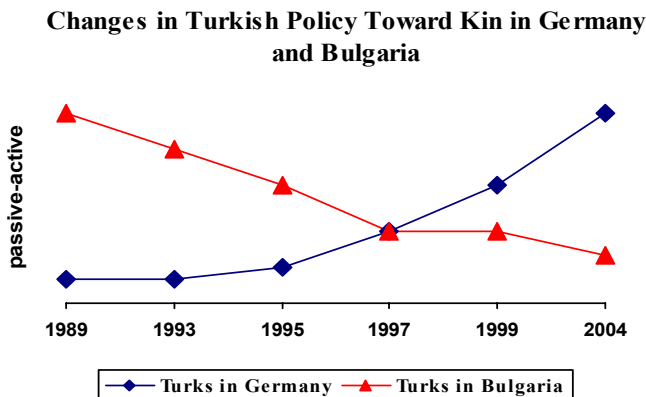
⁶¹ ANAP Genel Baskani Mesut Yılmaz, *TBMM Grup Konusması* (26 February 1997), available at <www.anap.org.tr> accessed December 2004.

the neighbour countries and in Turkey, and it prefers to leave sensitive problems to societal actors on the two sides of the border.

This approach seems further accentuated after the strategic reorientation of the Turkish kin policy towards the emigrants in the EU countries. As an emigration country with citizenship practices reflecting its experience with the Turkish migrants in Germany and other EU countries, Turkey had the option to shift priority from the kin minorities in the former socialist states to the Turkish emigrants in the EU member states.

As seen in Graph 2, after 1995 Turkey activated its policy on Turkish emigrant community in Germany, while lowering its interest toward kin minorities in the Balkans. Consequently, this approach toward kin in the Balkans causes steady protests from the migrant associations who accuse the Turkish government of indifference and insensitivity toward the problems of Turkish citizens and nationalities abroad. The officials do not accept these complaints and argue that the Turkish state gives importance to the protection of kin minorities in the region and seeks fair implementation of the bilateral agreements for protection of national

Graph 2:



minorities in neighbour states.⁶² Obviously, the expectation of the migrant society and kin minorities seems closer to the kin minority protection policies involving elements of the newly developed models for kin minority protection in the region, as shown by the most discussed Hungarian Status Law.⁶³

Nevertheless, except the common concern about keeping the kin minorities in their home states, it seems hard to talk about a consistent Turkish kin policy applied during diverse governments. While some of the political parties and governments exercised a more tolerant policy toward immigration of the Bulgarian Turks, others, for example the government of Refahiyol coalition, preferred a restrictive and prohibitive kin policy toward the Turkish minority in Bulgaria.⁶⁴ Implemented during the first half of the 1990s, this policy relied on firm visa restrictions that resulted in intensive human trafficking across Bulgarian-Turkish border. This policy also led to considerable human losses in the traffickers' conveyers and trucks.⁶⁵ These policies slowed down the immigrant flow, but they caused severe tragedy in Bulgarian Turkish families. Under the worsening economic situation in Bulgaria and absence of education in their regions, numerous minority families separated or changed to Bulgarian names in order to take a Turkish visa and move to Turkey. Some minority members found jobs under Bulgarian names in Bulgaria. Others sold their property and paid 1,500 DM to human truck-traffickers to reach Istanbul, even though it sometimes might cost their life. Because of these policies, until 1998 Bulgarian citizens with Bulgarian origin were privileged in their travels to Turkey. It is clear that far from being a kin minority protection policy; this policy was a nationalist state-centric strategy to prevent further emigration of the kin from its home countries.

After consistent protests and lobbying of the migrant association, the Turkish government radically changed Turkey's kin policy. In practical

⁶² Nurcan Özgür, 'Göçmen STK'aları ve Türkiye'nin Balkanlar Politikası', *STK ve Turks Dış Politikası* (Istanbul, forthcoming 2006).

⁶³ Kántor et al. (eds.), *op. cit.*

⁶⁴ İçişleri Bakanı Meral Aksener, 'Bulgaristan'dan göç eden soydaşlarımızın sorunlarına ilişkin gündem dışı konuşmalara cevap', *Genel Kurul Tutanağı*, 20. Dönem 2. Yasama Yılı 60. Birleşim (25 February 1997), available at <www.tbmm.gov.tr>, accessed December 2004.

⁶⁵ 'Granichna politsiia preseche kanal za trafik na khora', *News bg* (25 October 2000), available at <www.news.bg>.

terms, by 1998 the government applied the Convention for Residence attached to ‘The Bulgarian-Turkish Friendship and Good Neighbourhood Agreement of 1925’. Rather liberal in its content, this Convention provided an extensive freedom and equal treatment for cross-border movement between Bulgaria and Turkey. The provisions of the first five articles allowed Bulgarian and Turkish citizens to easily reside, work, invest, settle, and buy or sell property (except lands from village areas) on either side of the border under equal conditions with the locals. The Convention also puts forth provisions for avoiding double service and taxation in regards to military service, education, and commercial enterprises.⁶⁶

In accordance with this Convention, Turkey opened its borders to all Bulgarian citizens and applied free movement across the border, free three-month residence and work permission, free trade, opportunity for foreigners to buy property, and extensive avoidance of double taxation. This policy did not find an equal reply from the Bulgarian side, which kept applying its suspicious approach through high visa prices and difficult conditions for investment and residence in Bulgaria for Turkish citizens. Yet, the Turkish policy succeeded in significantly calming the allure of permanent settlement in Turkey, which was high in Bulgaria’s Turkish community. It also presented a great opportunity for Bulgarian citizens, regardless of their ethnic background, to move temporarily to Turkey, find jobs, collect some money, and return to their countries. An important indirect result was that through this policy Turkey shared high unemployment pressures with Bulgaria and turned a blind eye to the increased flow of capital to Bulgaria.

Obviously, Turkey applied this liberalization in order to create an opportunity for kin minority members to improve their conditions in Bulgaria and thus create local capital that may increase investments in ethnically diverse regions in Bulgaria and consequently stop emigration. As a semi-periphery country, in many aspects Turkey’s policy recalls the former Western models for preventing economic emigration from the Third World through policies to address unemployment in the source country. In assisting the socio-economic welfare of Turkish and Muslim minorities in Bulgaria, Turkey aimed to provide minorities with a future

⁶⁶ İsmail Soysal, *Türkiye'nin Siyasal Bağlıları*, vol. 1 (Ankara, 1993), pp. 260–263.

‘as equal citizens of their countries of residence’,⁶⁷ and citizens who could protect themselves by international means for minority protection and human rights.

This policy seems opposite to the Bulgarian one, which prefers to diminish the percentage of the Turkish minority in its country. Obviously the success of these cross-border policies depends extensively on Bulgaria’s *de facto* implementation of EU conditionality for minority protection. However, as long as Bulgarian governments keep manipulating anti-Turkish feelings and promote general suspicion against its own minority citizens and Turkey, a long-run solution for the minority problems in Bulgaria itself and consistent mutually beneficial relations with Turkey seem unreachable.

During the late 1990s, Turkey drew back from its previous Cold War position in kin minority protection, and it initiated a complex policy based on dual citizenship and bilateral agreements for protection of minorities signed in the interwar period. It involved domestic and international societal actors, such as migrant and kin minority associations, business councils, NGOs, and international institutions for human and minority rights. In this way Turkey initiated a path for kin minority self-protection based not on Turkey’s intervention, but on implementation of international norms. In contrast to the previous kin minority protection policies, this new policy is not based on intervention or shaming of the policies of home states, a strategy of which minorities usually bore the brunt. It obviously led to further minority and migrant participation in the decision-making and policy implementations concerning the problems of the communities under consideration. In some cases, it supported the development of independent minority intellectuals and civil organizations; however, it also could aggravate further inter-state and inter-minority troubles. Obviously, in most of the cases this policy resulted in political and financial manipulation of ethnic minorities through civil institutions and intellectuals of ethnic majorities. Nevertheless, in distinction to the traditional state-ruled policies, a policy based on kin minorities’ ability to use the available international normative and institutional tools for protecting their own rights may facilitate the integration of minorities as equal citizens in their home states.

⁶⁷ This is a widely known statement that Turkish officials and statesmen often emphasize in their speeches about the kin minorities and migrants. Check also at <www.mfa.gov.tr>.

Conclusion

One of the outcomes of international human rights, minority and migrant rights standards, and kin minority protection policies in the Balkans is further self-protective reproduction of national citizenship in the regional nation states. Most of the Balkan states still preserve their strong ethnic identity both at the legal and executive stages, and they tend to approach dual citizenship as an important subject of domestic politics. Because of this, many states in the region develop differentiated and controversial approaches toward dual citizens in their country. There is often an ethnically defined differentiation between dual citizenship granted to the kin minorities abroad (for example Bulgarians abroad, Turks abroad, Macedonians abroad etc.), and that granted to former migrants of different ethnic origin and other non-nationals (for example, Turkish migrants with Bulgarian citizenship, Macedonians with Bulgarian citizenship, or Bulgarians with German citizenship).

This ethnic model of differentiation appears particularly vivid in the case of Bulgaria, where the discourses over political participation and social rights of dual citizens with different ethnic background face opposition from the ethnic majority. Bulgaria constitutes a case where the involvement of notions of reciprocity in the social rights of dual citizens and emigrants with non-Bulgarian origin competes with policies promoting dual citizenship for applicants with Bulgarian origin. Furthermore, the Turkish migrants' voting in the Bulgarian elections presents an important example about the preconditions, patterns, and process of differentiation in dual citizenship status between national and cultural norms, leading to formation of two different dual citizenship statuses based on ethnic differentiation, which in turn is followed by distinctions in rights and obligations. Another example of diversification in the dual citizenship practices is demonstrated in the national dual citizenship policies in Turkey.

At the beginning of the 1990s, dual citizenship policy in Turkey seemed a privilege aimed at preserving and strengthening the bonds with its citizens in Germany and other EU countries. In 1998, this policy was extended to the immigrant community in Turkey as a rare healing for the problems of the migrants/refugees from Bulgaria. Nowadays, in Turkey's view, dual citizenship is an option allowing forced migrants to return to

their homeland and an opportunity for Turkey itself to relieve the growing social and political pressure of the migrant community. Beside all that, dual citizenship works as a compromise for Bulgaria to avoid an additional financial burden that may cause further hardships for its economic and political development.

As the case of social rights of dual citizens shows, the accommodation of dual citizenship works relatively successfully in solving and moderating problems resulting from forced population movements. However, in certain conditions, dual citizenship may not solve the problems of forced migrants residing in their kin-state. Instead, in some cross-border cases it may convey nationalist intentions and ethnic disputes. As examples show, the success of dual citizenship depends not only on the normative basis, but also to a significant degree on the mutual openness for dialog and cooperation between parties to the problems under consideration. It requires a deep concern for principles of equality and fairness during implementation of dual citizenship policies by the governments. Otherwise, dual citizenship may result in indirect discrimination of home minorities and unfair prioritisation of kin minorities. When approached as an immigration country, Turkey's dual citizenship policy presents a relative awareness concerning this connection and gives obvious priority to the holders of Turkish citizenship, while it also tries to emphasise the virtues of citizenship to its kin minorities under the jurisdiction of their home states. It contains strong protection for the political membership of Turkish citizens and relies entirely on respect of territorial unity and minority protection within the borders and jurisdiction of the home states. These conditions are strongly emphasised in Turkey's approach to its own minorities, such as Greeks, Armenians, and Jews. Numerous developments show that Turkey's recognition of its historic ethnic diversity strengthened the notion of civic citizenship in Turkey and diminished its interest in the kin abroad. In other words, Turkey's kin policy shifted its main concern from the ethnic minorities in its historical lands (the Balkans, Central Asia) to the Turkish citizens abroad. Furthermore, as an emigration country, Turkey emphasises its own kin policy model based on respect for the territoriality and sovereignty of the involved states.

An important characteristic of the Turkish dual citizenship policy is its fuzzy practice, launched by the numerous activities of the domestic and transnational societal actors. The complex involvement of numerous

migrants' associations in the protection of kin minorities abroad enables unnecessary manipulations and aggravation of cross-border problems and concerns about sovereignty and territorial unity of the involved states. However, this intensive societal involvement does contain significant potential for further development of cross-border communication and acquaintance between the involved communities and nations. Even more importantly, this pluralist practice gives an opportunity for the development of civic actors that can further the patterns of kin minority self-protection based on the international norms for human rights.

In general, Bulgaria introduces a considerably different case from Turkey's kin minority protection and dual citizenship policy. It is a case of normatively and institutionally established, geographically enhanced, and ethnically selective kin minority protection policy. Bulgarian dual citizenship practices constitute a fruitful example for investigation of the patterns of inconsistency and indirect discrimination based on differential evaluation of dual citizenship policy for kin and home minorities. This way of evaluation is likely to damage the role of common culture and shared past as well as present and future norms and values, all of which are necessary in the building of multicultural societies.

In the case of Bulgaria, dual citizenship policy combines two sensitive aspects, involving both extensive financial release from additional burdens on the already drained social budget and a political trump for nationalist Bulgarian circles envisioning separatist scenarios on behalf of Turkey. The functional diversity in Bulgarian dual citizenship policies demonstrates a particular example for further research. It presents a process of transition from dual citizenship as a subject of domestic politics aimed at limiting the political activity of former dissidents to a policy of national kin renovation that extends and purifies the borders of Bulgarian citizenship as an ethnically defined construction. Ethnic differentiation in the Bulgarian dual citizenship practices led to further inclusiveness for the Macedonians, Thracian, and Besarabian Bulgarians, and reservation toward dual citizen expatriates with non-Bulgarian or non-Slavic Orthodox ancestry.

In this way, dual citizenship represented a tool for geographic enlargement and ethnic activation of nationality. It was one of the ways the Bulgarian state tried to keep, regain, or build up ties with nationals living abroad as well as to extend the scope of national citizenship in quantitative, geographical, and qualitative extents. Moreover, the

Bulgarian case showed that in the long run, dual citizenship in small countries, such as Bulgaria, also appears as measure against a possible ‘evanescence’ of a nation because of decreases in the population growth and continuous emigration. For such small nations, dual citizenship may also serve as a tool to increase the population of the ethnic majority vis-à-vis the ethnic minority and keep the national identity alive and dominant. Thus, dual citizenship has played an important role in the post-communist nation building processes in the Balkan states considered as countries of emigration, such as Bulgaria.

In short, tolerant in its inception, the dual citizenship policy in Bulgaria tends to become selective and exclusive in its differentiated perception of non-Bulgarian and Bulgarian dual citizens’ participation in Bulgarian political life. In contrast to Turkey’s model of kin minority protection, dual citizenship status meant a kind of a nation building tool for post-communist Bulgaria. As in many other Balkan countries, citizenship in Bulgaria preserves its deep ethnic content and serves as a source of national belonging and solidarity strengthening the spirit of the ethnic majority. From this point of view, it is an important subject of domestic politics and handicap for developing a successful model for kin minority protection on the side of Turkey.

In its practices, dual citizenship preserves the minority status of the dual citizens with non-Bulgarian origin, and depends on the availability of active interaction between migrant and minority institutions as initiators of cross-border political mobility. In the case of Turkish migrants, dual citizenship reflects more a model of kin minority self-protection based on the international minority and human rights norms and *triadic relation* between the home state, its citizen minority members, and dual citizens. In political terms, this relation depends on the home states’ approach to restrictive policies as a mechanism of effective citizenship. In some cases, it seems less problematic that it is not kin-states, but the diaspora or migrant communities themselves, that develop dual citizenship practices into a policy of kin minority self-protection.

In general, the spread of dual citizenship in the Balkans suggested a process of redefinition of state sovereignty in the reestablishment of nationality and the content of citizenship in respect to citizens’ rights, responsibilities, and scope of participation.⁶⁸ The presented cases show

⁶⁸ Rey Koslowski, *Migrants and Citizens: Demographic Change in the European State*

that this redefinition goes in a complex direction involving ethnic redefinition of citizenship and leads to strengthening of state sovereignty in the definition of the content and scope of citizenship as a status based not on civic rights, obligations, and participation, but ethnically defined rights, obligations, and privileges.

On the other hand, the case of Turkish dual citizens in Bulgarian politics shows that despite the local historical and security obstacles in encouraging ethnic and cultural diversity in the Balkan nation states, dual citizenship status promotes cross-border political exchange and activity across distinctive national cultures. The emergence of this cross-border political sphere, based on the political participation of the dual citizens representing different ethnic backgrounds, may both increase the links and clean out important historical biases between Bulgaria and Turkey, as well as open more opportunities for greater interaction. Promoted by the migrant associations, local cooperation initiatives, and twin-municipalities, the extraterritorial political links tend to serve as a basis for further economic and cultural cooperation and exchange between Bulgarian and Turkish societies. In this way they tend to facilitate the promotion of longstanding solutions for potential minority problems.

The case of extraterritorial elections involves important aspects of the dual citizenship problematique, especially in relation to national policies. It presents a sample for understanding the function of NGOs and the limits of dual citizenry in relation to involved states. The diversity in the functions of the migrant NGOs and ethnic parties, as well as other civil organizations, give hints for developing civil means for self-protection based on the international norms for human rights.

The case of elections attracts attention to both the manipulative and developing function of the dual citizens' NGOs and political parties in the involved countries. Bearing in mind the associations' intentions for migrant representatives in the Bulgarian parliament, we may say that elections opened the way for substantive formation of a de-territorialised sphere of politics between Bulgaria and Turkey. They offered a reassessment of cross-border opportunities for collective action and stimulated individual participation and awareness of dual citizenship rights, duties, and divided loyalty.

Further research has to grasp the complications resulting from dual citizens' political participation and the problems regarding the cross-border exercise of political rights. The post-1989 cross-border developments between Bulgaria and Turkey show that interaction between cross-border actors, such as migrant associations, twin municipalities, minority parties, and local governmental structures involved in cross-border elections and economic links, may extend into a new kind of extraterritorial social space based on dual citizenship rights, responsibilities, and common participation. This dual structure may serve as a basis for further development of cross-borderness and lasting interdependency between two countries. Or, it may be pulled back into the arms of the nationalist circles on the each side of the border. Obviously, in contrast to the general opinion of the nationalist circles, this dual structure may not necessarily refer to any existence of pretensions for a dominant cultural sphere with a prospect to develop into a public sphere of a territorial entity. On the contrary, these kinds of extraterritorial links may serve as a ground for further economic and cultural cooperation and exchange and thus facilitate moderation of long-lasting historical prejudices and longstanding solutions for likely minority problems.