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The politics of dual citizenship in Lithuania:  
Explaining resistance

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## **Abstract**

As the processes of globalization intensify, the issues of people migration and citizenship receive more scholarly attention than ever. The questions regarding dual or even multiple citizenship are unavoidable nowadays and governments have to decide whether they tolerate the fact that their citizens may also be citizens of another state or do they prevent their citizens from acquiring multiple citizenships. There are various understandings of dual citizenship and the common belief is that more states tolerate dual citizenship than ever.

This master thesis concentrates on the dual citizenship politics in Lithuania. While it seems that at least in Europe the governments tend to allow or tolerate dual citizenship, the dual citizenship regulation in Lithuania is strict and dual citizenship is not tolerated despite the large extent of emigration and emigrants wishes to have the right to dual citizenship. The public debate on the dual citizenship in Lithuania is intense for about a decade now and politicians have been urged to solve this issue many times. However, all the intended changes were stopped by the Constitutional Court of the Republic of Lithuania, leaving no way to solve this unless the Constitution of Lithuania is changed.

The politics of dual citizenship in Lithuania in the thesis are analyzed using theoretical framework of the nation-building and the geopolitical thinking in the post-soviet states. First of all, the reasons for the strict regulation of the dual citizenship in The Constitution of Lithuania written in 1992 are analyzed. Second of all, the resistance to the dual citizenship is analyzed in the context of current emigration from Lithuania. The main data was gathered by interviewing experts of the citizenship politics in Lithuania. It is revealed that the political resistance to dual citizenship in Lithuania is the result of the geopolitical insecurity, national minorities residing in Lithuania as well as of Lithuania's historiography.

*Keywords:* Lithuania, citizenship, dual citizenship, nation-building, geopolitics, national minority, ethnicity, post-soviet, historiography

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## **1. Introduction**

As the world becomes more globalized, the academic interest in the citizenship and migration grows prominently. The migration intensifies, so do and the issues of the citizenship of those who migrate. The number of people who settle outside the states whose citizenship they hold is increasing and this naturally raises the question of dual or even multiple citizenship. Should it become a norm because of the processes of globalization or should governments restrict dual citizenship because of unknown political and social consequences for the nation-states?

The dominating theories in the citizenship literature are those which argue that the tolerance towards dual citizenship and the number of states which allow their citizens to be another state's citizens as well is increasing. This assumption is based on the growing importance of human rights paradigm and the higher than ever migration extent. It is often argued that the dual or multiple citizenships is a logical consequence of the globalization and therefore it should be tolerated. These arguments are often found in the academic literature in so-called "immigration" states that experience a very high immigration from the Global South states. However, the debate about the dual citizenship is still quite different in the Eastern Europe, especially in the Baltic States. If the dual citizenship is tolerated, the arguments for that are somehow different than in the Western states.

In the case of Lithuania, dual citizenship is restricted and not tolerated except certain requirements are fulfilled but that makes a number of people who are allowed to have dual citizenship very small. The resistance and opposition to the dual citizenship in Lithuania are analyzed in this thesis. First of all, the restrictions that lay within the Constitution of Lithuania are analyzed using the theoretical framework of the nation-state building in the post-soviet states. Second of all, it is analyzed why there are no changes in the regulation of the dual citizenship now.

## **1.2. Research problem and questions**

While there are some studies done on the citizenship politics in Lithuania, there are very few or even no studies done regarding politics of dual citizenship. The circumstances in which the citizenship politics are situated in Lithuania have changed dramatically after entering the EU in 2004. A large scale emigration has started and continues until this day. Lithuanian emigrants went mostly to the member states of the EU and settled there and consequently, the issues of the dual citizenship rights have emerged. Many emigrants began to talk about this issue in the media and on the internet and demand the right to dual citizenship. However, the political resistance against dual citizenship is still high and it is usually argued by the officials that the whole restriction lies in the Constitution of Lithuania which was introduced in 1992 and therefore, the only way to change the regulation of dual citizenship is to change the Constitution.

Because of the Law on Citizenship in Lithuania and restrictions that lay within it and in the Constitution of Lithuania more Lithuania's citizens have renounced their Lithuanian citizenship than ever. The intensive debates in the media, emigrants' forums and public sphere have been around for around a decade now and yet no political change regarding regulations of dual citizenship has happened.

The research problem is as follows: even though the demand for the dual citizenship is high because of the emigration extent and the debate about the dual citizenship dominates the public sphere and media for some time now, there are no political changes in regulation of the dual citizenship and it remains strictly restricted.

The main research question is:

- How the political resistance and opposition to dual citizenship in Lithuania can be analyzed and explained?

The other questions which constitute a great part of the main research question are:

- How the concept of the citizenship is understood in Lithuania and is it related to the resistance to the dual citizenship?
- Why the restriction of the dual citizenship is expressed in the Constitution of Lithuania and how this restriction is related to the political circumstances in 1992 when the Constitution was written?

The initial propositions are:

- The resistance to dual citizenship in Lithuania is related to the geopolitical context Lithuania is situated in;
- The resistance to dual citizenship in Lithuania is related to the fact that Russian minority resides in Lithuania;

## **2. Literature and theory review of dual – citizenship**

The theory and literature review of this master thesis is organized like this: first of all, the ongoing theoretical discussion about the concept of dual citizenship and its origins is presented. Second of all, the research on dual citizenship and its results are discussed. Finally, the theoretical and empirical studies carried out of the citizenship and dual citizenship politics in the Baltic States and Lithuania in particular are presented.

In order to discuss theories of dual citizenship the definitions of citizenship and dual – citizenship have to be presented. The definitions of citizenship and dual citizenship as some authors suggest are as follow:

- Citizenship is a source of rights and duties of individuals in the nation-state mode of political community and is delimited by national collectivity (Soysal, 2000 , p. 5);
- Dual – citizenship means that individuals combine citizenship of two nation – state (Faist et al., 2004, p. 4).

The definitions of citizenship and dual citizenship can be disputed. The first definition of citizenship includes not only a legal relation between an individual and a state but also a moral or symbolic one. Some may argue that the citizenship is only the institutionalized relation between the individual and the state, however it is also usually agreed that citizenship also has a deeper meaning and value. The theories of dual citizenship depend on the definitions and understandings of citizenship and what kind of relation it creates between the state and the individual. If citizenship is understood as an instrument to achieve certain objectives or as expression of legal relation between citizens and the state, when the concept of dual citizenship is less complicated. However, if citizenship is considered to be not only a legal connection to the state but also a moral obligation or emotional tie, the concept of dual citizenship gets more complicated and contested.

Soysal argues that the contemporary formation of the citizenship is influenced by two paradoxes: first, the increasing decoupling of the two main components of citizenship - identities and rights, and second, the growing tendency towards particularistic and group-based claims and their legitimation through universal discourse of the human rights. The concept of the citizenship in the nation-state mode is related to the national belonging which creates certain rights and duties of citizens. However, recently the citizenship is more often redefined as a human right. The duties and rights that were associated with belonging to certain national community have now become more and more often associated with transnationalism (Soysal, 2000 , p. 5).

Peter J. Spiro argues similarly that the right to have dual citizenship is a human right, therefore, in the world in which human rights paradigm is getting stronger dual citizenship should be normalized and widely accepted. The right to dual or even multiple citizenships is justified “through the optics of freedom of association and liberal autonomy values” (Spiro, 2010, p. 111). Spiro claims that the dual citizenship was suppressed by the governments because of the historical conditions of ninetieth and the beginning of twentieth centuries, mostly because of the interstate conflicts

and wars. The dual citizenship was considered to be unacceptable because governments at that time needed loyalty from its citizens in the case of the military conflicts. However, according to Spiro, military conflicts among liberal states are very unlikely nowadays, therefore, there are no obstacles left for legitimization of dual citizenship. What is more, as the world witnesses the growth of global international community and other processes of globalization, accelerating dual and plural citizenships seems as a logical progress and solution to challenges posed by the globalization. It is argued that dual citizenship is a part of the individual freedoms and an important political right which means it falls under human rights framework. Spiro concludes: “It is now possible to frame acquisition and maintenance of the status as a right, to the extent that plural citizenship implicates individual autonomy and self-governance values.” (Spiro, 2010, p. 130).

Thomas Faist *et al* theorize the growth of tolerance towards dual citizenship as path – dependent process. They argue that the concept of the path – dependency in the context of citizenship politics basically means that:

[...] once political actors have started to move along a certain path – tolerating dual nationality under certain circumstances such as children out of binational marriages - there is every incentive to continue along the same way, and serious disincentives exist to reverse course. The original incentives for starting down the path may arise out of different contexts, e.g., dual nationality as a tool for social and political integration in immigration countries, or dual nationality as a means used by emigration country governments to maintain the loyalty of expatriates (Faist et al., 2004, p. 914).

Therefore, it is argued further that the increase of dual and multiple citizenships worldwide can be explained via processes of growing emphasis on individual rights *vis-à-vis* nation state prerogatives and sovereignty. The *de jure* tolerance towards plural citizenships has increased because of developments at inter-, supra- and national-levels which are related to changed understandings of integration of immigrants, nationhood and political systems in general (Faist et al., 2004, p. 924).

The notion that the tolerance towards plural citizenship has increased because of processes of mobility and migration is strengthened by Thomas Faist and Jürgen

Gerdes in the article “Dual Citizenship in an Age of Mobility” (2008). It is stated that a question of whether dual citizenship should be allowed usually comes up when the discussion turns to integration of the immigrants. The importance of societal, political and economic integration of the immigrants has risen prominently with increase of the immigrants and extent of migration in general. The right to integrate and be regarded as true citizens has been considered as a human right. Dual – citizenship has been argued to be a tool to promote naturalization and consequently full integration into a host society. The article concludes: “In a mobile world, dual citizenship will nonetheless continue to grow as new immigrants and their children strive to become full members of liberal democratic communities” (Faist and Gerdes, 2008, p. 15).

It is clear from these three articles that the main theorizing of the dual citizenship is very much related to frameworks of the human rights, integration of immigrants and international political realities nowadays. Dual citizenship is increasingly viewed as human and political right and as a logical consequence of processes of migration and globalization in general. The theories of the dual citizenship mentioned above reveal that the understanding of citizenship is instrumental. The citizenship is understood as the instrument for achieving equality among different members of society and as a convenient tool to adjust to realities of the globalized world.

## **2.1. Previous research on the dual citizenship policies**

A number of scholars attempted to analyze the politics of dual – citizenship worldwide and estimate numbers of states which allow and tolerate dual or multiple citizenship and which do not. One of the most informative studies was carried out by Joachim K. Blatter, Stefanie Erdmann and Katja Schwanke and is called “Acceptance of Dual Citizenship: Empirical Data and Political Contexts” (2009). A great research was conducted. The empirical data of historical developments in the regulations of citizenship policies and political contexts was analyzed. The overview of current dual citizenship research is presented in their paper which concludes that from 189

countries analyzed 73 countries accepts dual citizenship, 53 do not accept dual citizenship, 24 countries accept very limitedly, 14 countries which accept dual citizenship with treaty nations or tolerate dual citizenship de facto, and 25 countries with inconsistent results (Blatter et al., 2009, p.10). What is more, they carried out their own survey by sending questionnaires to 100 experts in 50 countries. They conclude that:

Our data reveals the high political salience of citizenship regulations in many countries and the fact that the acceptance of dual citizenship is often a very controversial aspect of citizenship reforms. In line with the data in the first part of the paper, our data shows a steady trend towards broader acceptance of dual citizenship. Furthermore, we discover a trend towards more symmetric regulations of dual citizenship insofar that emigrants and immigrants are treated similar (Blatter et al., 2009, p. 31).

It is important to mention that they also sent a questionnaire to Lithuania which was answered and the answers of the expert are very much related to the past and nowadays realities regarding politics of the citizenship and dual citizenship. Lithuania is one of the three countries of the survey, others – South Korea and Austria, in which dual citizenship is *de jure* not accepted and *de facto* minimized because of almost no exceptions and strong controls (Blatter et al., 2009, p. 31).

Most of the studies of dual citizenship politics concentrate on the Western states which experience relatively high immigration flows like Germany, France, and Canada, Great Britain or the EU countries after 2004. Therefore, the previously mentioned theories which regard dual citizenship as a part of the immigrants' integration and acceptance are dominating the field (*see* Dahlin and Hironaka 2008; Brøndsted Sejersen, 2008; Morje Howard, 2005; Bloemraad, 2004; Faist, 2007). As a result, research on the dual citizenship in the Western states strengthens the notion that dual citizenship is the instrument for achieving certain objectives in certain societies and is the expression of human rights. The following part analyzes the research of the dual citizenship and what purposes does it have in the Central and Eastern Europe.

### **2.3. Research on dual citizenship politics in the Central and Eastern Europe**

Studies regarding citizenship and dual citizenship politics in the Eastern Europe and the post-soviet and the post-communist states are considerably fewer.

The research which analyzes dual citizenship politics in the Eastern Europe or the post-communist states usually concentrates on Poland, Hungary, Romania, and Moldova. Poland attracts scholars because of its huge diaspora. Hungary and Romania are analyzed because of their kin minorities and ethnic tensions. Constantin Iordachi in the “Dual Citizenship in Post-communist Central and Eastern Europe: Regional Integration and Inter-ethnic Tensions” compares Western Europe dual citizenship politics with Central and Eastern Europe politics. According to Iordachi:

In accounting for the global proliferation of dual citizenship, I will show in this paper that in Western Europe and North America, the spread of dual citizenship has been motivated by the need to integrate permanent residents, being thus linked to the phenomena of globalisation and labour migration, increasing cultural pluralism, and forms of multiple socio-political identities. In Central and Eastern Europe, policies of dual citizenship have been related to the revival of national and ethnic policies of post-communist states, addressing the need for more effective minority protection. These features account for the major difference in the expansion of dual citizenship in the two regions: dual membership has been primarily granted to internal permanent-residents in the West, but to external and compact kin populations in the East (Iordachi, 2006, p. 106).

Iordachi shows that the expansions of the dual citizenship in the West and in the East are based on different reasons. The dual citizenship politics in the Eastern and Central Europe are related to national and ethnic issues in the region while the states in the West are mostly concerned with the immigration and human rights.

The politics of the dual citizenship in Poland are analyzed in the context of emigration and a huge Polish population residing outside Poland. It has been argued that in Poland *de facto* tolerance of the dual citizenship is quite uncontroversial because of an importance to maintain good relations and cultural ties with Polish diaspora. There is basically no public attention to questions of multiculturalism and

immigration, therefore dual citizenship is tolerated selectively and does not include dual citizenship rights for immigrants (Gorny, et al, 2007, p. 165).

The case of Poland reveals again that the politics of dual citizenship are understood differently and used for different purposes than in the Western states. The reasoning for toleration of the dual citizenship is based on the ethnical and national aspirations and objectives to maintain connections with Poles worldwide. The concept of the dual citizenship is also understood differently in the post-soviet states, especially in the Baltic States. The following parts of the thesis will expand on that.

#### **2.4. Research on the citizenship politics in the Baltic States**

Some research has been done on the citizenship politics in the Baltic States.

Olivier Danjoux wrote the dissertation thesis on the concepts of citizenship in Lithuania, Latvia and Estonia after re-gaining Independence after break-up of the Soviet Union “L’ETAT, C’EST PAS MOI Reframing Citizenship(s) in the Baltic Republics” (2002). Danjoux analysis of the citizenship politics in Baltic States is historically deep, all – inclusive and full of important insights. He concludes that:

I found that the kind of citizenship now developing in the Baltic countries does not fit under a single heading. It is informed both by legacies from the Soviet period and by the specific conditions under which these societies are extracting themselves from the Soviet experience. Citizenship has been reframed both as a means to reject the Soviet experience, as a means to manage the concrete legacies of that experience, and as a necessary principle of collective democratic organization (Danjoux, 2002, p. 323).

This is to say that the politics of the citizenship in the Baltic States are somehow different both from Western States and Central and Eastern European states. The Baltic countries fall not only in the category of the post-communist states but also in the category of the *post-soviet* states which means they were incorporated in the Soviet Union during the Second World War. This also means that all three states have a certain post-soviet legacy, for example, Russian minorities residing in the Baltic States after the breakup of the Soviet Union with which they dealt differently and this

influenced the formation of the citizenship policies after 1990. The politics of the citizenship in the Baltic States are further analyzed in the theoretical framework of the nation-state building in the post-soviet states.

Kristine Kruma in “Lithuanian nationality: Trump card to independence and its current challenges” (2009) presents a historical overview and analysis of the citizenship policies in Lithuania since 1989. The principles of acquisition and loss of the Lithuanian citizenship are deeply analyzed and current political debates are presented. The dual citizenship was restricted ever since the adoption of the 1991 Law on Citizenship and The Constitution of Lithuania written in 1992. The Constitutional Court of the Republic of Lithuania has delegitimized nearly 30 statutory and sub-statutory dual citizenship law’s provisions and omissions because these conflicted with the principles of citizenship written in the Constitution (Kruma, 2009, p. 98). The politics of the citizenship in Latvia, Estonia and Lithuania are analyzed deeply further in the thesis.

### **3. Theoretical framework: The nation-building in the post-soviet states**

The disintegration of the Soviet Union raised many concerns for politicians in the post-soviet states and many questions for the political scientists. Some questioned the possibilities of democratization and liberalization in the post-soviet sphere, some were excited about the breakup of the world’s largest remaining empire, and some were interested in how post-soviet republics are going to establish or re-establish their independent nation-states. Therefore, the theory of the nation-building is one of the dominating theories that explain how the post-soviet states coped with post-colonial legacy and how they created their own political identity as the nation-states. The nation-building in the post-soviet states, as I argue, greatly influenced the formation of the citizenship politics and the formation of national identities. Who were defined as the citizens in the post-soviet states, resulted from the processes of the nation-

building. What is more important, the citizenship politics largely depended on what form this nation-building took and what purpose did it have. At the same time, the politics of the citizenship was one of the most important tools in the nation-building. It can be argued that the nation-building and the citizenship politics were very intertwined in the post-soviet states. The one could not be done without the other. What is more, it is difficult to separate which process influenced the other more. This notion will be analyzed in more extent in the following parts of the thesis.

The terms nation-building and state-building are usually used interchangeably in some scholarly literature. However, the concept of nation-building is more normative and includes aspirations of creating or re-creating certain national identities within the territory of the state. According to Harris Mylonas: “Legitimate authority in modern national states is connected to popular rule, to majorities. Nation-building is the process through which these majorities are constructed (Mylonas, 2012, p. 17). In other words, the *nation-building* refers to processes of defining and fostering people’s national identity and their sense of belonging to certain community based on shared history, language, culture, and ethnicity. The term *state-building* on the other hand, refers to the creation of institutions of the functioning state which inspire the loyalty of the people, and defining state boundaries that are accepted by the majority of the political elite (Tolz, 1998, p. 993).

It is useful also to conceptualize what is *a nation* if this thesis analyzes the politics of the nation-building in the post-soviet states – what the post-soviet states were trying *to build*. In this thesis *the nation* is defined as:

“a group of people with one or more specific cultural traits whose members (1) think of themselves and are thought of by others as being part of it and (2) endorse a political program aimed at enhancing or maintaining a system of individual and/or collective rights and privileges” (Janmaat, 2000, p. 33).

According to this definition of *the nation*, the post-soviet republics were *building* a certain group of people who were perceived as belonging to that group based on shared culture, history, and other national traits. This nation-state building

encompassed various political programs to strengthen and maintaining a political system which would be able to secure certain individual and collective claims of that nation. As it is argued in this thesis, one of the most important political programs in the post-soviet states was defining citizenship and who are citizens of those particular nation-states.

In the post-soviet republics both nation-building and state-building took place at the same time. Democratic institutions had to be created, market had to be liberalized, new political elites had to be elected and the people had to be prepared for the economic and institutional changes. The processes of the nation-building and the state-building were closely intertwined in the post-soviet states. It may be argued whether the nation-building is a part of the state-building or *vice versa* or maybe they go parallel. However, I argue, that in the case of post-soviet states the nation-building process had a significant impact on the processes of creation of the institutions and policies because the political elites tend to have an interest of harmonizing the territorial and the national units through the construction of a common national identity among the population (Mylonas, 2012, p. 17-18). The politics of the nation-building were essential in the sense that newly independent societies in the post-soviet republics needed to be united under the term *nation* first, in order to create successful and legitimate institutions governing these states. As I argue further, the politics of citizenship played a major role in processes of the nation-building in the post-soviet states. The politics of citizenship is a leading factor in the initial steps in deciding how nation is going to be defined and built and who is going to constitute the nation.

While the collapse of the Soviet Union was at least to some extent a surprise for the world, for the ethnic political elites in some soviet states it was not so unexpected. The political elites in the Baltic States, Transcaucasia and Ukraine were preparing for this event for some time before The USSR actually collapsed. The idea of Independence was always alive among dissidents and intellectuals in the most of the soviet republics (Gachechiladze, 1997, p. 51).

Some scholars argue that the Soviet Union can be analyzed as a colonial empire. The Soviet Union fits the definition of the empire because it had a defined core (Moscow and Russian SFSR) and non-core peripheries – the non-Russian republics. Moscow and Russian SFSR represented the imperial state and the political elite within peripheries were ruled by state administrators. If an empire is defined as a relation, formal or informal, in which one state controls political sovereignty of another political state and society, the Soviet Union fits this definition (Kuzio, 2002,p. 242).

The notion that the Soviet Union may be conceptualized as the empire is backed up by other scholars as well. Even if some authors did not like calling the Soviet Union “an empire”, a historical revisionism changed it. The Soviet Union is being reinvented as the empire in most of the scholarly literature lately because more scholars and politicians acknowledge that it was illegitimate, composed polity which was unable to stop rising nationalism within it. As it was mentioned before, in the Soviet Union the center (Moscow) dominate the periphery (the soviet republics) to the disadvantage to the latter. The Soviet republics were subjected to inequality and subordination. What is more, the incorporation to the Soviet Union was usually carried out brutally with military means followed by coercive technologies to pacify the resistance in the soviet republics (Smith, 1998, p. 3-4).

If the Soviet Union may be analyzed as the colonial power, after its disintegration newly formed nation-states have entered a post-colonial phase. Therefore, they had to deal with certain Soviet imperial legacy. The state and nation-building policies in some of the post-soviet republics were aimed at removing that legacy and are similar to ones adopted by other states with the post-colonial legacy. The term ‘de-Sovietisation’ is widely used to describe the processes of removing the Soviet legacy. Inside the term ‘de-Sovietisation’ there was also a notion that meant that ‘the other’, mainly but not exclusively Russian minority, are not to be trusted and especially in the Baltic States it was believed that ‘de-Sovietisation’ is going to be finished when the Russian minority returns to reside in Russia (Smith, 1998, p. 14).

The states are biased to different degrees in the way they define their titular group, culture, language, historiography and symbols. The post-soviet states have inherited ethno cultural understanding of nationhood as a result of Soviet nationality policies and have been assigned certain ethnic homelands to where their titular ethnic group and language should theoretically coincide and dominate. In reality, however, the soviet republics experienced some threats to their culture, language, collective memory and symbols. Belarus, Ukraine and Kazakhstan were heavily Russified and became bilingual if not dominated by Russian language. Some soviet non-Russian republics experienced heavy in-migration of Russians (Kuzio, 2002, p. 250).

The Russian minority, Russian language and erosion of national history and memory can be considered to be a large part of Soviet legacy to the post-soviet states. The question arises – how newly formed nation-states in the post-soviet sphere dealt with this Soviet legacy? As Tarias Kuzo argues: “A central aspect of overcoming this legacy is re-claiming the past from the framework imposed by the former imperial core and thereby creating, or reviving, a national historiography that helps to consolidate the new national state. All states including those traditionally defined as lying in the “civic West,” have in the past—and continue to—use national historiography, myths, and legends as a component of their national identities.” (Kuzio, 2002, p. 241).

In order to revive certain national historiography, the post-soviet states had to turn back to their so-called “golden age” to confirm that they had distinctive national histories. According to Kuzio:

Post-Soviet states are in the process of searching for their “lost” history in the preimperial era in order to confirm that they possess “golden eras” and a workable past that can be used to legitimize their newly independent states. This is particularly important where territory remains contested between the former imperial metropolis and the post-colonial state. All nations require elements of common descent where contemporary unity is transported back in time (Kuzio, 2002, p. 249).

Therefore, the post-soviet states turned back to their pre-Tsarist and pre-Soviet histories in order to create a basis for the nation-state building in newly independent

states. What is more, newly independent nation-states had to decide how to define their political communities and it is argued that this could not be done objectively:

In the same manner as in all other civic states, post-Soviet states cannot be objective when deciding questions such as how will the political community be defined (by the titular nation or by the titular nation and Russians), what national historiography will be used, should the former metropolis be defined as the “Other,” will the state have one titular or two (the titular nation and Russian) state languages and what state symbols (flag, national anthem, symbol) will be chosen (Kuzio, 2002, p. 249).

In some post-soviet states, notably Latvia, Estonia, Georgia, the Soviet legacy being Russian minorities and territorial disputes, the political elites have made some disputed decisions after first years of independence and wanted to eliminate all Soviet legacies. To conclude, in all of newly independent nation-states Soviet legacy has caused certain conflicts and unease in the processes of the nation-building and in the formation of the citizenship politics.

#### **4.1. The post-soviet geopolitics, the nation-state building and citizenship**

The nation-building processes in the post-soviet sphere were influenced by certain factors. One of the dominating factors was the geopolitical context. After the disintegration of the Soviet Union a number of territorial conflicts have occurred on the margins of the multiethnic state. In the European part of former USSR the conflicts were less frequent but nationalist issues were still visible and disturbing. Some conflicts were territorial while others were related to the rights of the Russian diaspora in some of the post-soviet republics. The breakup of the Soviet Union raised many questions about its territorial claims, especially in those territories where the Russian population was significantly larger. The geopolitical thinking is central in Russia’s understanding of its place in the world and plays an important role in Russia’s foreign affairs policies.

It is important to mention that geopolitics is not merely a concept to describe physical borders among states and power struggles which take place within those borders anymore. As Tsygankov further states:

Geopolitics, however, is not and should not be viewed as a discipline that studies primordial geographical factors and helps to understand countries' 'natural' or 'objective' politics. Although many in the West and Russia continue to theorize and practice this kind of geopolitics, they mislead themselves and do a disservice to their respective countries. A narrow focus on 'objectively defined' national interests or 'natural' institutions — whether they are Western-style liberal democracy or Russian autocracy and self-sufficiency — deprives us of possibilities of creative participation in shaping and re-shaping political space for common human interests. Vision of world order inspired by this old-style essentialist geopolitics often produces negative perceptions and confrontations in the world, thereby undermining the very peace and stability sought by their authors (Tsygankov, 2003, p.105).

The concept of new geopolitics, on the other hand, emphasizes a socially constructed geopolitical thinking and imagination and draws attention to possibilities of re-shaping and re-evaluation of geographical spaces and political order beyond the tradition understanding of borders and boundaries. The advocates of new understanding of geopolitics argue that it is not enough to study certain state practices towards other states. It is argued that historiographies, national myths and symbols need to be included in order to understand those practices properly. Moreover, the concepts of boundaries and borders need a broader perspective. The concept of boundaries is not only about power and domination in the certain region. The new geopolitics is concerned as much with physical geography of maps of the states as it is with maps of meanings. The border setting practices are conceptual and cartographic, imaginary and actual. Such perception of geopolitics put a great emphasis on the concepts of identity, security, or proximity, and maintains that these concepts cannot be entirely neutral or objective. The concepts mentioned become a reflection of those who use them (Tsygankov, 2003, p. 105). This is to say that geopolitical imagination and thinking are subjective and constructed and in a way represent certain state's historiography. It also affects how states perceive themselves

in the global world and in the certain region and what role they think they have in the global politics.

In order to understand why certain post-soviet states were concerned about post-soviet geopolitics, the role and identity of Russia in the post-soviet region needs to be analyzed. The concept of Russian identity plays a significant part in Russia's geopolitical thinking. The Russian national identity was always related to an empire. Russian nation-building historically coincide with empire-building. The crisis of Russian identity after the collapse of the Soviet Union is very much related to the fact that ethnic Russians did not see their ethnic republic as their homeland. The homeland for Russians was the entire USSR, the policy which led to confusion of Russian and Soviet identities. Russians were 'the elder brother' and the 'leading nation' of the Soviet Union (Kuzio, 2002, p. 242). On the contrary, the non-Russians in the post-soviet republics saw their ethnic republics as their homelands. Therefore, redefining their homeland was a complicated process for Russians and for Russian politics. As Kuzio argues:

[...] although Russia has not launched military aggression against any former Soviet state to back up territorial claims, it has remained difficult for it to reconcile 'Russian' identity to that encompassed within the borders of the Russian Federation. Russia's psychological map of its 'borders' are not those of the Russian Federation; many of its elites often confuse the borders of the former USSR/Commonwealth of Independent States (CIS) with those of 'Russia' and not those of the Russian Federation (Kuzio, 1997, p. 38).

As the Federation of Russia still struggles to make peace with its new identity, many scholars have discussed and questioned the role that Russia will take upon in the globalized world. The concerns about Russia's geopolitical identity after the breakup of the Soviet Union have stimulated a rise in geopolitical thinking and geopolitical imagination in Russia. Some argued that Russia's role will decrease significantly in the post-soviet region; however it appeared to be false assumptions. According to A. P. Tsygankov:

I argue that despite the expectations of some scholars and policy-makers, Russia did not retreat from the Eurasian geographical space and in fact is keenly interested in securing its cultural, political,

and economic presence there. The majority of Russian elites and intellectuals are convinced that without answering larger questions of the post-Soviet space and its politico-economic re-organization, the nation will not be able to adequately meet its domestic challenges, such as political stabilization and economic development. The Russian majority shares the premise that both Russia's domestic problems and the conflicts on the country's periphery are largely geopolitical in nature and would be best resolved on a basis of an overarching geopolitical vision and strategy, rather than separately or on an ad hoc basis (Tsygankov, 2003, p. 102).

The role of the Russian minorities in the post-soviet states plays an important part in Russia's and the post-soviet states geopolitical thinking. As it was mentioned above, this particular minority symbolizes the post-soviet legacy and for some post-soviet states – Soviet occupation. For Russian Federation it symbolizes the sphere of glorious historical past and nowadays a potential sphere of influence in the post-soviet republics. The Russian diaspora legitimated an active Russian engagement in the internal and external affairs in the post-soviet states. The concerns about the rights of Russian minorities in post-soviet states became a significant part of Russia's political discourse and the foreign policy objective. The frequent targets were the Baltic States. Russia used these concerns about the perceived violations of ethnic Russians minority rights to threaten Latvia with cutting oil exports (King and Melvin, 1999, p. 121).

The post-soviet region and Russia's relation with it plays an important role in Russia's foreign policy and geopolitical thinking. The post-soviet states are important for Russia because of various reasons like fear of ethnic conflicts which may influence Russia negatively, the need to preserve economic ties with this region and find allies, but most importantly, to secure the approximately 25 million Russian diaspora as it was mentioned above. Russia perceives the post-soviet states as “near abroad” which implies that these states are not so “foreign” as other and are subjected to different set of rules and treatment. Some imply that these states fall under the Russian sphere of influence (Kubicek, 1999, p. 556).

In case of some post-soviet states, the Baltic States in particular, the perception that they are in the Russian sphere of influence and are subjected to different treatment, is not welcomed. For the Baltic States it largely means insecurity and Russian “near abroad” politics are perceived to be threatening the survival of the independent nation-state. The Russian minorities are perceived as the source of threat from Russia as well. This perception was strengthened by the statements made by Russian authorities that justified military intervention in order ‘to protect Russian citizens’ in 2008 when the military conflict broke out between Georgia and Russia. Georgia was blamed for violating Russian minorities, who was believed by Russia to be Russian citizens, rights and therefore, Russia justified the concept of *responsibility to protect*. This Russian claim was rejected and resulted in many questions and observations. It has been argued that this military intervention was more of the Russian show of its military power and ambitions in the “near abroad”. According to D. Steinberg:

[...] international observers questioned whether the primary purpose of the Russian military intervention was to protect South Ossetian civilians or instead to establish full Russian control over both South Ossetia and Abkhazia, where there was no claim of genocide; to dismantle Georgia’s military capability; to scuttle its NATO ambitions; and to send a clear signal to other former parts of the Soviet Union as to what would and would not be tolerated by Moscow. In addition, the introduction of some 20,000 troops and 100 tanks not only into South Ossetia but also into Abkhazia and Georgia proper appeared manifestly excessive. The Russian naval blockade in the Black Sea as well as aerial bombings of Gori, Poti, the Zugdidi region and an aviation plant in Tbilisi went well beyond the necessary minimum (Steinberg, 2009, p. 439).

What is more, the fact the Russia did not seek approval from the UN Security Council for this military intervention shows that Russia is determined to pursue its geopolitical objectives and does not comply easily to international pressure. I argue that the cited paragraph above concludes very well what some of the post-soviet states may be afraid of. The geopolitical insecurity is perceived to come from Russia, especially in the case of the Baltic States and Georgia.

If we assume that geopolitical thinking and imagination are constructed and subjective, it raises many interesting questions about the certain state's geopolitical identity and how certain state understands its geopolitical environment and neighboring states. In the context of post-soviet states it is important to mention that the geopolitics of the post-soviet region was constructed of two directions: from Russia's perspective and certain post-soviet republic's perspective. It is also important to stress out that those geopolitical perspectives were directed towards each other. At the same time, geopolitical imagination both of Russia and of the post-soviet republics was greatly influenced by national historiographies and mythical pasts. Moreover, in some cases, notably the Baltic States, Ukraine, Armenia, geopolitical thinking of the post-soviet republic conflicted with the geopolitical thinking of Russia. Some post-soviet republics did not mind joining The Commonwealth of Independent States, an organization which was intended to replace certain characteristics of the Soviet Union. However, others rejected this idea and tried to abolish any possibility of joining not only the same organizations as Russia but also any Soviet legacy and identification with it. The Russian minorities residing in certain post-soviet republics were also perceived as threat.

To some up, the nation-building processes in the post-soviet states took place in the certain geopolitical context and the politics of nation-building in certain states reflected the geopolitical thinking of those states. For some newly independent states geopolitical context of that time did not play a major role in their state and nation-building while for other newly formed nation-states this geopolitical context appeared to be threatening to their own nation-building because of the certain historiography and experiences. As the result, the politics of the nation-building and citizenship were formed accordingly to the perceived threats and insecurity in the geopolitical context.

## 5. The citizenship politics in the post-soviet states

After the collapse of the Soviet Union the fundamental questions of the citizenship politics emerged in the post-soviet republics. The questions regarding citizenship were an essential part of the nation-building process and a problematic issue as well. The Soviet legacy, mostly the Russian minorities in non-Russian states, has played an important role in the construction of the citizenship politics as well as it disturbed them as well.

The politics of membership and citizenship in the post-soviet republics is a large subject. It encompasses many different but related issues and struggles over identities and loyalties, inclusion and exclusion, the nature of the state, the belonging of the state, the relation between culture and politics, private and public life (Brubaker, 1992, p. 273). These issues were dealt differently in different post-soviet states and for the interest of this thesis only the Baltic States and Lithuania in particular are analyzed in more details.

In order to show one of the problematic aspects of the citizenship politics in the post-soviet states, the understanding of the citizenship in the Soviet Union has to be analyzed first. It has been argued that the Soviet understanding of the citizenship as something separate from nationality and nationhood has caused certain problems in the post-soviet states, especially in those with big Russian minorities. Brubaker explains:

The Soviet Union has collapsed, but the contradictory legacy of its unique accommodation to ethnonational heterogeneity lives on. That accommodation pivoted on *institutionalized multinationality*. The Soviet Union was a multinational state not only in *ethnodemographic* terms - not only in terms of the extraordinary ethnic heterogeneity of its population - but, more fundamentally in institutional terms. The Soviet state not only passively tolerated but actively institutionalized the existence of multiple nations and nationalities as constitutive elements of the state and its citizenry. It

codified nationhood and nationality as fundamental social categories sharply distinct from statehood and citizenship (Brubaker, 1994, p. 49).

The nationality and nationhood in the Soviet Union were institutionalized exclusively on the sub-state level rather than the state-wide level. The Soviet Union was never institutionalized as a nation-state but it was not a consequence of the fact that the Soviet Union was multiethnic state. This was rather the result of how ethnic heterogeneity was institutionalized and ethnic nationality was aligned with the organization of the public sphere. Brubaker explains how the Soviet nationality regime was different:

Thus the Soviet Union was neither conceived in theory nor organized in practice as a nation-state. Yet while it did not define the state or citizenry as a whole in national terms, it did define component parts of the state and the citizenry in national terms. Herein lies the distinctiveness of the Soviet nationality regime - in its unprecedented displacement of nationhood and nationality, as organizing principles of the social and political order, from the state-wide to the sub-state level. No other state has gone so far in sponsoring, codifying, institutionalizing, even (in some cases) inventing nationhood and nationality on the sub-state level, while at the same time doing nothing to institutionalize them on the level of the state as a whole (Brubaker, 1994, p. 52).

In a way the Soviet Union was encouraging and strengthening the nationalisms in the soviet-republics but there was practically no space left for autonomous political processes there. What is more, the perception of what is citizenship in the Soviet Union was confusing in a way the people were citizens of the republic and of the Soviet Union but the republic's citizenship was perceived to be not important. The passports identified nationality but not citizenship:

At the same time there were intrinsic impediments to the nation-state formation on the basis of the Union republics, one of them being the actual absence of the citizenship of a Union republic: although theoretically people were simultaneously the citizens of a republic and the USSR as a whole, the latter was overwhelmingly superior in importance. Being a citizen of a Union republic meant actually nothing, much more important being a point in the internal passport identifying nationality, not a republic's citizenship (Gachechiladze, 1997 p. 53).

Brubaker further argues that the Soviet Union was never organized as the Russian nation-state. The Russians were perceived as belonging to the Soviet Union.

Therefore, after the breakup of the Soviet Union when the post-soviet republics were being organized as the nation-states based on the ethnic majority, some 25 million ethnic Russians found themselves outside the territory of now Russian Federation. These Russians have become new national minorities in the post-soviet states and this resulted in a question: where do they belong? Minority elites tend to represent the minority as belonging to another nation. In the case of the Russian minorities in the post-soviet republics, the political elite in Russian Federation see these minorities as belonging to Russia (Brubaker, 1994, p. 72).

Therefore, the some of the most important questions that the post-soviet political elites had to answer are: who constitutes the citizenry of this particular nation? Who belongs to the nation-state? Who are thought to be loyal to the newly created nation-state and who are to be trusted? Who are to be included and excluded? To what extent citizenship should coincide with ethnicity? (Brubaker, 1996, p. 43). The political authorities in the post-soviet states had to answer these questions from the very beginning of independent statehood after the collapse of the Soviet Union. In a sense, these post-soviet republics were *choosing their citizenry* in order to secure newly independent nation-states and ensure smooth and progressing processes of the nation and state-building. This way the citizenship politics reflect the interests of the nation-states.

Some may ask why the Russian minorities were important when the politics of the citizenship in the post-soviet republics were formed. Firstly, the conflict of belonging of those Russian minorities was clear both for Russian minority and non-Russian post-soviet republics. Second of all, the decisions of whether the ethnic Russians should be included as citizens of newly independent nation-states were greatly influenced by geopolitics and national historiography. These notions resulted in the perception that the question whether Russians should become citizens of non-Russian post-soviet states were of great importance in the processes of the nation-building. Some post-soviet states like Latvia and Estonia decided to exclude the Russian minority from broader citizenship rights. The next part of the thesis analyzes

the reasons for that and the citizenship politics in the Baltic States *via* the geopolitical thinking and the nation-state building processes in these states.

## **6. The Nation-building and the politics of the citizenship in The Baltic States**

Some post-soviet states were more successful in the nation-building and democratic transition than others. Of all fifteen post-soviet republics only the Baltic States – Estonia, Latvia and Lithuania - are consolidated democracies and only they are the members of the European Union and NATO. The Baltic States may be distinguished from other post-soviet states also because after the breakup of the Soviet Union they were the ones to re-build their nation-states. The Baltic States were independent nation-states in the interwar period and they experienced being incorporated into the Soviet Union in a similar way in 1940.

The Baltic States nationalism and nation-building was different from other post-soviet states because of interwar statehood and subsequent international refusal to recognize their incorporation into the Soviet Union. The re-claiming the past national historiography was especially essential in the Baltic States because they have been the last ones incorporated into the Soviet Union and this act was always considered to be illegal and illegitimate.

As the result, the Baltic States in the academic literature are usually considered to be *established* states because of their history of internationally recognized statehood in the interwar period. In the established states the politics of citizenship may concern two questions. First of all, what rules should govern naturalization? Second of all, what rules should govern the continuous assignment of state's citizenship, usually by birth? New states, to the contrary, have to decide how the initial body of citizens should be constituted (Brubaker, 1992, p. 277).

Because of interwar statehood and independence and international community's refusal to recognize their incorporation in the Soviet Union, the Baltic States are in the different place regarding the issues of the citizenship from other post-soviet republics. The nationalist political elites in the Baltic States can argue that these states are not successors of the Soviet Union. They are successors of the interwar republics, therefore, they are not new states and they do not need to define their initial body of citizens. It has been argued that their states and citizenship have continued to exist *de jure* if not *de facto* because the incorporation in the Soviet Union was illegal and illegitimate. Therefore, all they need to do is to restore the citizenships of those who lived in those states interwar period and to their descendants. Everybody else should be regarded as foreigners and they are eligible to acquire the citizenship through naturalization but they should not be defined as citizens (Brubaker, 1992, p. 278).

As it was mentioned earlier, the nation-building in the Baltic States was greatly based on the principle of restoration. The principle of restoration played a significant role in the 1988-1991 chain of events in which the Baltic States re-entered the arena of the international politics. The governing elites in Lithuania, Latvia and Estonia perceived their states of the interwar successor states to the interwar *de jure* republics and also accounted for *de facto* re-emergence of geopolitics in these three states. The Baltic elite this time tried to escape the geopolitical context of 'the East' and strive forwards the geopolitical realities of 'the West'. Because of this new direction of the Baltic States in the geopolitical map, the elites in these Baltic States had to re-map both external and internal spaces of state sovereignty because they believed that 'going West' required it. Aalto suggests that the mappings of external and internal spaces of the Baltic States should be called as 'restorationist geopolitics'. The restorationist geopolitics in the Baltic States was about invoking a dichotomous differentiation of Latvian, Estonian or Lithuanian identity from Russian minority residing in the state, and a spatial and territorial differentiation from Russia. The both identity and spatial differentiations were affected by security concerns (Aalto, 2000, p. 66).

Therefore, it can be assumed that the politics of nation-building in the Baltic States were highly influenced by the perceived security concerns posed by Russian minority and broader geopolitical context. The Russian population in Lithuania, Latvia and Estonia was considered to be troubling because of feared military intervention from Russia in order to “protect its people”. However, the Baltic States represent cases of nationalisms which were successfully taken under control: responding to the international pressure before accession to the EU, the Baltic States governments made important changes in their citizenship and other laws which made exclusionary ethnic states into civic political communities (Budrytė, 2011, p. 14).

In the late 1980’s significant numbers of residents of the Baltic States supported independence despite the activities of pro-soviet groups created to counter nationalisms in these states. The elections to the Supreme Soviet Parliaments were held in March 1990 in Estonia, Latvia and Lithuania. These elections were the first multiparty elections held in the Soviet Union and as many argue, they were equivalent of the referendum on independence. The elections were surprisingly inclusive: non-communist parties and even military Soviet personnel were allowed to participate. The nationalist successive powers have won the elections and in the spring of 1991 referendums on independence were held. All residents were allowed to vote and the answer to independence was a strong “yes”. In Lithuania 90 % of residents supported independence, in Latvia – 74% and in Estonia – 78% (Budrytė, 2011, p. 15).

In the lights of these events one of the major issues that the ruling elites in the Baltic States was the issue of citizenship. They were willing to accept that the future independent state may include those who migrated to the Baltic States during the Soviet occupation – Russian minority. However, the politics of citizenship were focused on the survival of the newly independent states. The debates over citizenship in Latvia and Estonia were strongly restorationist. The restorationists in Estonia argued that citizenship should be restrictive:

After more than a year of debate (1990–91), those favouring restrictive citizenship laws triumphed. In February 1992, the old Citizenship Law from 1938 was reinstated. Those who held Estonian citizenship before 16 June 1940, and their descendants (approximately 900,000 people, or approximately 58 % of the population), automatically became citizens of post-Soviet Estonia. The naturalisation process for other residents (more than 400,000 people, or approximately 26 % of the population) included the following requirements: residence in the territory of Estonia for at least the previous two years, a one-year waiting period, proficiency in the Estonian language, and an oath of loyalty to the State (Budrytė, 2011, p. 16-17).

The political community building in Latvia was similar in many ways – it was exclusive and restrictive:

In October 1991, the Supreme Council restored Latvian citizenship only to those who had been citizens of Latvia in 1940 and their descendants. This left more than 700,000 people, or approximately 28 % of Latvia's residents, without Latvian citizenship. Most of these people were Russians, Ukrainians and Belorussians (Budrytė, 2011, p. 17).

In Latvia and Estonia the initial politics of citizenship were based on fear of Russian-speaking residents and memory of terror during Stalin's era and Russification policies adopted during years of occupation. These restrictive citizenship policies resulted in Russia blaming Estonian and Latvian governments in violation of human rights and received various criticisms from certain international organizations for human rights as well as the EU.

Lithuania, on the other hand, dealt with non-Lithuanian minorities quite differently and was not monitored internationally that much. While the citizenship politics were intensively discussed by the majority of the Lithuanian Reform Movement which later won the first multi-party elections in Lithuanian Soviet Socialist Republic, the outcome of these discussions was different than in Latvia and Estonia:

Unlike Latvia and Estonia, Lithuania's laws on citizenship and minority rights were consistent with the expectations of the international community right from the start. The Citizenship Law (1991) offered citizenship to all permanent residents of the country and the Constitution and other laws have supported minority rights. The result of this legislation was that, according to the 2001 census, 99 % of all residents had Lithuanian citizenship (Statistical Office of Estonia, Central Statistical Bureau of

Latvia, and Statistics of Lithuania 2003). The Constitution of Lithuania adopted in 1992 guarantees cultural minority rights and prohibits discrimination based on ethnicity. It allows Lithuania's ethnic minorities to foster their language, culture, and customs, and grants minorities the right to administer their affairs, independent of the State, in the areas of culture, education and organisations (Budrytė, 2011, p. 24).

The decisions made by Lithuanian authorities were praised by international community; however, the as in Estonia and Latvia, the debates about the status of the minorities were greatly influenced by geopolitical and nationalist considerations. The ethnic insecurity in Lithuania was expressed through the desire to preserve Lithuanian language and doubts concerning loyalty of its non-Lithuanian citizens (Budrytė, 2011, p. 24).

To conclude, the citizenship politics and principles of exclusion or inclusion play a significant role in the nation-building. In the Baltic States both citizenship politics and processes of the nation-building were greatly influenced by Soviet legacy and national historiography. The geopolitical insecurities regarding newly re-built nation states and questioned loyalty of national minorities as well as perceived threats from Russia effected how the politics of citizenship were constructed and the political community was created. While it seems that in Lithuania's case the issues of citizenship of the national minorities were solved quite successfully compared to Latvia and Estonia, once the laws of citizenship became restrictive in Lithuania, it stayed that way.

## **7. Research design: a case study**

The aim of the thesis is to explain the resistance to dual citizenship in Lithuania. Therefore, the main question to be answered is: *why* there is resistance to dual citizenship and *how* to explain it? In order to explain the opposition to dual citizenship in Lithuania, the case study has been chosen as a research strategy.

The case study is used as a research strategy in various situations, to expand theoretical and practical knowledge of the social, individual, political, organizational, and related phenomena. The case study is used to analyze policy, political science, public administration, sociology, management studies and mostly in a dissertations and theses in the social sciences (Yin, 1984, p. 13). The need for cases study derives from the researchers' aspirations to analyze and understand complex social phenomena. In some situations the case study as the research design has a distinct advantage. According to Robert K. Yin, in situations when a research question begins with the words "why" or "how" and when a contemporary set of events over which the researcher has little or no control are analyzed, the case study has the advantage (Yin, 2009, p. 4). The logic of the case study as the research design is composed of two elements: a scope of the case study and the technical definition of the case study. To quote Yin:

1. A case study is an empirical inquiry that
  - Investigates a contemporary phenomenon in depth and within its real-life context, especially when
  - The boundaries between the phenomenon and context are not clearly evident.
2. The case study inquiry
  - Copes with the technically distinctive situation in which there will be many more variables of interest than data points, and as one result
  - Relies on multiple sources of evidence, with data needing to converge in a triangulating fashion, and as another result
  - Benefits from the prior development of theoretical propositions to guide data collection and analysis (Yin, 2009 , p. 18).

The political phenomenon analyzed in this thesis is the resistance and opposition to dual citizenship in Lithuania. The case study as the research design is a relevant method to analyze the politics of dual citizenship because the problem of the thesis is compatible with the logic of the case study. Firstly, the politics of dual citizenship in Lithuania is a very significant topic right now as it was mentioned before. The whole

debate is situated in its real-life context; however, the boundaries are not clear between the context of the citizenship politics and the actual politics of the dual citizenship. The main question of the thesis is about a complex social phenomenon and requires different sources of data. What is more, the previous theoretical knowledge is applied in order to explain the resistance to dual citizenship in Lithuania – the theoretical framework of the nation-state building and geopolitical thinking in the post-soviet states. Therefore, to conclude what this case study is about: the case study investigates 1) the contemporary phenomenon – the resistance to the dual citizenship in Lithuania – and 2) which is situated in its real life context – large emigration extent, emigrants' demands and ongoing debates in the media. In order to explain the resistance to dual citizenship in Lithuania, certain theoretical assumptions had to be made first.

The role of theory in the case studies is to make sure that the research design is constructed according to some relation to the academic literature, policy issues and other relevant sources. Good usage of theories helps to delimit the case study questions to its most effective research design and generalize the results of inquiry more accurately (Yin, 2003, p. 5-6). The theory of the nation-state building combined with the theory of the geopolitical thinking in the post-soviet states helped form and decide on the initial hypothesis of this case study.

The analysis of this case study is as follows: the explanation of the resistance and opposition to dual citizenship in Lithuania starts with the analysis of the regulation of the citizenship in the Constitution of Lithuania adopted in 1992. This is followed by the analysis of the political resistance to dual citizenship in Lithuania nowadays despite the changed political context and pressure from Lithuanian emigrants to allow dual citizenship.

### **7.1. Methodology: expert interviewing**

The main methodology of data collection used in this case study was expert interviewing. All the interviews were conducted by me.

Interviewing is considered to be one of the most important sources of case study data in the social sciences. The type of the interviewing used in this research was of an open-ended nature and semi-structured. These types of interviews allow the researcher to ask key respondents for certain facts of the phenomenon analyzed as well as the respondents' opinions about certain events which may become the basis of the further investigation (Yin, 1984, p. 83). The semi-structured interviews were conducted because certain questions had to be asked differently to certain respondents and their opinion on the issues analyzed had the primary importance for this thesis.

The strength of the interviewing as methodology is that it allows both interviewer and respondents to explore the meaning of the questions and answers involved in the research. There is an implicit or explicit negotiation of understanding in the interview and any misunderstandings on the both sides can be checked immediately. What is more, the interviewing has an advantage of rapid and immediate responses which may not be obtained in any other research methodology (Brenner et al., 1985, p. 3).

The disadvantages of interviewing include costly means and time consumption while transcribing them, and the opportunity for bias to occur because of the close intensive, face-to-face conversation between the researcher and the respondent. Some respondents may feel sensitive about the questions asked; some may be incompetent to answer certain questions and this may result in invalid answers (Brenner et al., 1985, p. 4).

The interviewing is also considered to be a certain challenge for the researcher because it requires certain characteristics and skills. Yin defines the required skills needed for data collection as follows:

- A person should be able to ask good questions – and to interpret the answers.
- A person should be a good “listener” and not be trapped by his or her own ideologies and preconceptions.
- A person should be adaptive and flexible, so that newly encountered situations can be seen as opportunities, not threats.
- A person must have a firm grasp of the issues being studied, whether this is a theoretical or policy orientation, even if in an exploratory mode.
- A person should be unbiased by preconceived notions, including those derived from theory. Thus, a person should be sensitive and responsive to contradictory evidence (Yin, 1984, p. 56-57).

Therefore, while interview is being conducted, the researcher has to have all the above mentioned traits in mind and remain careful. At the same time the interviewer has to monitor whether her or his actions are relevant and adequate in the context of interview situation and interview guide. What is more, the answers provided by respondents need to be monitored as well: are the answers to the questions adequate, complete and relevant? Therefore, the researcher must be able to react to any inconsistencies and at the same time think what to do next (Brenner, 1985, p. 154).

Despite the difficulties of the interviewing, this methodology may be one of the most revealing for the researcher and an interesting and important academic experience.

## **7.2. The respondents and conducting the interviews**

The respondents of the interviews were carefully selected to make sure they are working with the issues of the Lithuanian citizenship and are competitive to answer the questions and comment on the whole situation. Initially, two respondents were selected and contacted from each of the institution that is dealing with issues of the citizenship and dual citizenship in Lithuania. These institutions are: The Constitutional Court of the Republic of Lithuania, The Foreign Affairs Ministry of the Republic of Lithuania, The Presidential Palace and the Migration Department of the Republic of Lithuania. Two respondents who were not state officials were

selected as well in order to get a more comprehensive understanding and probably a different perspective about the politics of dual citizenship in Lithuania: a journalist and editor who has published articles about dual citizenship in Lithuania, and a political scientist from the International Relations and Political Science Institute of Vilnius University.

Unfortunately, the both interviews with the officials from the Migration Department were not recorded because of the error of the recorder. The notes were being taken during these interviews; however, I think that the notes are not suitable for the analysis because they are not reliable source of data and may not be accurate enough compared to the transcribed interviews of the other respondents.

A set of questions was prepared for the interviews based on the initial theoretical explanations for the certain citizenship politics in the post-soviet states. At the time when the interviews were scheduled, I only had some theoretical assumptions about the politics of the dual citizenship in Lithuania. However, the questions reflect the main themes and my initial hypothesis that I intended to cover when conducting these expert interviews. First of all, I was interested in the circumstances which surrounded the adoption of the Constitution of Lithuania in 1992. Second of all, the objective was to find out why there is no change in the politics of dual citizenship nowadays. The questions may be found in the appendix 1.

Even though I had the questions prepared in order to help me cover the most important issues, I had to be flexible in asking those questions when I was interviewing different respondents. Some of the questions were asked all the respondents, while others were not. As one of my objectives was to find out how the concept of citizenship is understood by the officials, they all of them were asked this question. However, the certain questions seemed to be more complicated to answer for some respondents and I soon noticed that I need to ask the same question but in a different way in order to get the answer. The flexibility of the questions was required and they were not asked in the same order in every interview.

What is more, almost all respondents mentioned that the topic of my thesis is a sensitive one and asked anonymity. For some respondents I had to assure several times that their names and exact occupations will not appear in the text. The anonymity was required by the state officials in the Foreign Affairs ministry, the Presidential Palace and the Migration department. The Justices of the Constitutional Court did not ask for anonymity, nor did the political scientist and journalist.

As the researcher I was already familiar with the Law on Citizenship and the Constitution of Lithuania as well as the debate about the dual citizenship in Lithuania, therefore, I was mostly interested in my respondents' personal opinions and interpretations of certain events, political decisions and laws mentioned above. When I expressed my wish to hear the personal opinions about the politics of dual citizenship in Lithuania, I soon realized that certain respondents, state officials in particular, felt uneasy because of the difference between what *they really* think as individuals and what *they should think* as being officials and implementers of the law. Some of the respondents repeated several times that their opinion is personal and does not reflect the laws. It was mentioned that they are not talking as the state officials to me but expressing their own opinions about the matter. Some respondents told directly that they are supposed to answer the questions asked as state officials governed by law only and that their opinion should coincide with what is written in laws. An interesting observation was made when the interviews were conducted with the Justices of the Constitutional Court. Their opinions were heavily affected by their legal practice and expertise in law and the way they explain the whole situation was quite different.

Some interviews were longer than others and it depended largely on the time the respondents could spend talking to me. Because of the time shortage I had to decide what questions are more important to ask while the interviews were already being taken and to adjust the questions according to the respondents' occupation. I met all the respondents at their work place, except the political scientist and the journalist.

When conducting interviews, if the researcher is conducting them himself or herself, one of the essential things is to decide how to present oneself. This decision is very important because the way the researcher presents oneself leaves an impression on the respondents and even has influence over the answers to the questions and overall success of the study (Fontana and Frey, 2003, p. 77). I started to think about how to present myself to the respondents from the very beginning. Because the sensitive issue in contemporary Lithuanian politics is being analyzed, it was important for me as the investigator to not pose any threat for the respondents and their jobs. All the respondents were relieved to know that I am not a journalist but a student at the university abroad. In the beginning of the each interview I told my respondents a little about myself and about the purpose of these interviews in order to assure them that my objectives are purely academic and the content of the interviews will not reach any media. Trusting the investigator is also essential for the respondents (Fontana and Frey, 2003, p. 78). Therefore, my presentation of myself had to make the respondents trust me because as it was mentioned above, the questions that are being asked are related to sensitive political issue in contemporary Lithuania.

Despite the challenges of the interviewing the respondents discussed in this chapter, somehow consistent answers to the questions have appeared in almost all interviews. The respondents answered similarly to the key questions that were aimed at understanding the resistance to the dual citizenship in Lithuania. The question of reliability is unavoidable, however, I believe that I have chosen the respondents carefully and their answers are reliable and enable me to draw certain conclusions about the issue analyzed in the thesis.

## **8. The politics of citizenship in Lithuania**

The resistance and opposition to dual citizenship in Lithuania are analyzed in the following parts of the thesis. In order to analyze the politics of the dual citizenship in Lithuania, they need to be situated in the broader context of the citizenship politics. The politics of the citizenship in Lithuania are presented in the following chapter and analyzed using the theoretical framework of the nation-state building and geopolitical thinking in the post-soviet states. The law on Citizenship and the Constitution of Lithuania are analyzed in order to show how restricted is dual citizenship and reasons for this restriction are discussed.

The politics of citizenship in Lithuania was quite uncontroversial compared to Latvia and Estonia and therefore, scholars usually concentrate on Latvia and Estonia when analyzing the politics of the citizenship in the Baltic States. Even though, the analysis are of the Baltic States politics on citizenship, Lithuania are usually excluded from the deeper analysis because of there were no major conflicts regarding citizenship with Lithuania's ethnic minorities unlike in Latvia and Estonia.

Lithuania became the first Soviet republic to adopt republic level citizenship law on November 3, 1989, just some months before declaring Independence on March 11, 1990. The citizenship law in Lithuania was an inclusive compromise between the restored-state model and new-state model: citizens of the interwar Lithuania and their descendants were granted with Lithuanian citizenship automatically, as well persons born and permanently residing in Lithuania and are not citizens of the another states. Others residing in Lithuania on the date when this citizenship law was enacted were given two years to decide whether they want to become citizens of Lithuania. There were no conditions of language, ethnicity or permanent residence for acquisition of the automatic citizenship. Out of population of around 3.5 million, only about 350 000 residents did not receive Lithuanian citizenship before the two-year period has ended and it was mostly because of the lack of information or choice rather than legal exclusion. Some residents feared the

reverse of the Independence and threats to those who gave up the Soviet citizenship (Barrington, 1995, p. 734).

Why the initial politics of citizenship in Lithuania after re-gaining Independence were so different than in Latvia and Estonia? There may be several explanations. First and the most important factor is that the political authorities have felt secure about Lithuania's ethnodemography. Ethnic Lithuanians shared 80% of the residents through interwar period till 1989. Unlike in the cases of Latvia and Estonia there was no massive Russian immigration. According to the Statistics Lithuania, proportion of ethnic Lithuanians is 83,7% in 2012 compared to the total population, ethnic Russians – 5,3%, ethnic Poles – 6,6%, Belarussians – 1,3%, Ukrainians – 0,6% (Lithuanian Official Statistics Portal). If we look at the statistics, it is clear that the percentage of Russian minority in Lithuania is significantly smaller than in Latvia and Estonia. However, as it is presented in the following parts of the thesis, Lithuanian political elites were and still are concerned about them.

### **8.1. The law on Citizenship, the Constitution and the nation-state building in post-soviet Lithuania**

The development of Lithuanian citizenship legislation can be divided into three phases. The first phase started with the adoption of 1989 law on Citizenship which provided inclusive conditions for acquiring Lithuanian Citizenship (Kruma, 2009, p. 98). The second phase was when the law on Citizenship of 1989 was replaced by the new one on December 5 in 1991. The new law on Citizenship was different from the one adopted in 1989 as it eliminated granting automatic citizenship for permanent residents while those who were citizens of Lithuania before 1940 were able to acquire Lithuanian citizenship without naturalization. What is more, the resolution was passed which stated that acquisition of Lithuanian citizenship made the Soviet citizenship invalid for that person (Barrington, 1995, p. 734). The stricter conditions

for acquiring Lithuanian citizenship were introduced. This second phase was confusing and problematic because the political authorities were trying to combine the principle of continuity of Lithuanian citizenship and avoidance of the dual citizenship. The third phase marks the introduction of 2002 law on Citizenship which attempted to make provisions to the 1991 law on Citizenship and liberalize the regulation of dual citizenship (Kruma, 2009, p. 98).

The 1991 law on Citizenship began the phase of strict regulation of Lithuanian citizenship. The criteria for naturalization were expanded as well. The regulation of dual citizenship in Lithuania was attempted to liberalize with every new provision of law on Citizenship since 1991. None of these attempts were successful because all the initiated provisions to allow dual citizenship to more Lithuanian citizens ended up vetoed by all Lithuanian presidents who were elected at the time.

The principles of Lithuanian citizenship and some articles regulating Citizenship in the Constitution of Lithuania are presented in the analysis because it shows how strict is the regulation and the fact that Lithuanian citizen cannot be citizen of another state is mentioned both in law on Citizenship and the Constitution. Principles of the current Lithuanian citizenship presented in 2010 Law on Citizenship include:

1. Citizenship of the Republic of Lithuania shall be based on the continuity of the Republic of Lithuania and its citizenship;
2. Every Lithuanian shall have the right to citizenship of the Republic of Lithuania, which shall be implemented in accordance with the procedure laid down by this Law;
3. Citizenship of the Republic of Lithuania shall be equal irrespective of the ground on which it has been acquired;
4. A citizen of the Republic of Lithuania may not be a citizen of another state at the same time, except in individual cases provided for in law on Citizenship;

5. A citizen of the Republic of Lithuania residing in another state shall not lose citizenship of the Republic of Lithuania;
6. A citizen of the Republic of Lithuania may not be deprived of citizenship.
7. Citizenship of the Republic of Lithuania shall be lost only on the grounds and in accordance with the procedure laid down by this Law (Law on Citizenship, Article 3).

The first principle emphasizes that the Lithuanian citizenship is based on continuity of the Lithuanian state and its citizenship. The emphasis on the continuation is the result of the restorationist politics in Lithuania after the re-gaining Independence. The political elites *were restoring* interwar republic of Lithuania with all its citizenry and the citizenship policies after 1991 strongly reflected this notion. The principles that Lithuanian citizenship may not be deprived and lost because of the residence in another state show that the Lithuanian citizenship is perceived as very important and should be protected by the state. The principles stated above form a certain notion that the Lithuanian citizenship is something to be secured, preserved and continued.

The text of the Constitution is also worth analyzing because it states the principles of the state of Lithuania and is helpful in putting Lithuania in the theoretical framework of the nation-building in the post-soviet states. The Constitution of Lithuania begins with preamble which defines the Lithuanian nation:

THE LITHUANIAN NATION

- having created the State of Lithuania many centuries ago,
- having based its legal foundations on the Lithuanian Statutes and the Constitutions of the Republic of Lithuania,
- having for centuries staunchly defended its freedom and independence,
- having preserved its spirit, native language, writing, and customs,
- embodying the innate right of the human being and the Nation to live and create freely in the land of their fathers and forefathers—in the independent State of Lithuania,
- fostering national concord in the land of Lithuania,
- striving for an open, just, and harmonious civil society and State under the rule of law,

by the will of the citizens of the reborn State of Lithuania, adopts and proclaims this CONSTITUTION (Constitution of the Republic of Lithuania).

It is clear from this preamble that the nation-building in the post-soviet Lithuania was based on the Lithuania's historiography and national memory. The usage of words describing what is the Lithuanian nation is essential here. The Constitution of Lithuania clearly states what the Lithuanian nation is: the state of Lithuania was created centuries ago by its fathers and forefathers and defended its freedom and independence and is reborn after years of occupation. Another thing emphasized is the Lithuanian language, culture and spirit and harmony. This preamble emphasizes and highlights the historical memory, existence and continuation of the Lithuanian state.

The continuation of the Lithuanian state is of the Grand Duchy of Lithuania (1253-1795). This period is considered to be "the Golden Age" of the Lithuanian state. Although, there are disputes still going on whether "the Golden Age" has ended when the constitutional Union was formed with Poland and resulted in the creation of the Lithuanian-Polish Commonwealth in 1569 (Snyder, 2003, p. 17). The preamble of the Constitution is referring to the Grand Duchy of Lithuania when it states that the Lithuanian state was created many centuries ago. The continuation of the Lithuanian state was also emphasized and based on the history of the Grand Duchy when the independence of Lithuania was announced for the first time in 1918.

The citizenship politics after 1991 reflected this particular historiography and restoration of the state of Lithuania. The post-soviet Lithuania was turning back to its collective memory and history of the interwar republic of Lithuania and the Grand Duchy of Lithuania in order to consolidate and secure the re-born state. The soviet-legacy that newly independent Lithuania had to deal with was not so much the Russian minority (because it was significantly smaller than in Latvia and Estonia) but rather *the historical trauma* of the Soviet occupation. The ruling political elites in the independent Lithuania were repeating all the time that the occupation was illegitimate and illegal. What is more, the Russian Federation was perceived as a successor state

of the Soviet Union and consequently a threat to independent Lithuania as well. Therefore, the politics in Lithuania shortly after re-gaining Independence were organized around several main ideas. These ideas were expressed by the ruling political elite and are consistently summarized in this paragraph quoted below:

First, they argued that Lithuania's interwar state was lost to Soviet influence, which they associated with Russia, and that after the Cold War Lithuania's newly regained statehood was threatened most by Russia. A strong state was therefore to be an important defense of the sovereignty of the Lithuanian nation. Second, Lithuania's nationalists argued that economic dependence on Russia was the state's primary security threat. Third, they argued that the state should therefore "reorient" its politics and economy from East to West. That is, Lithuania should cultivate close economic relationships with "European" states and reduce its economic dependence on Russia. And while the Lithuanian government should become part of the EU, NATO, and other Western institutions, it should reject under all circumstances multilateral, institutionalized economic and political relationships with post-Soviet states as a group, especially the Commonwealth of Independent States (CIS) (Abdelal, 2002, p. 464).

These arguments have a strong geopolitical notion. Lithuanian political elites feared political and economic influence from Russia and therefore a strong state had to be built in order to escape this influence and secure the sovereignty. The citizenship politics were believed to be essential in the processes of the nation-building and securing the sovereignty of Lithuania. The political elites in the post-soviet Lithuania had to make sure that they the citizens of Lithuania are loyal, can be trusted and were committed to the Constitution of Lithuania and laws. This statement in law on Citizenship sums up what is expected from citizens of Lithuania:

A citizen of the Republic of Lithuania must observe the Constitution, laws and other legal acts of the Republic of Lithuania, as well as international treaties to which the Republic of Lithuania is a party, fulfil the responsibilities set forth therein, protect the interests of the Republic of Lithuania, help strengthen its power and authority, and be loyal to it (Law on Citizenship, Article 6).

The loyalty of the Russian minority was always questioned in the Lithuanian politics. Despite the fact that the number of citizens are of Russian ethnicity is comparatively small, they are perceived to pose a threat to the state of Lithuania because *they are Russian* and according to the perception that Russia is the biggest security threat to Lithuania, they

become threatening as well. Especially when the Russian interest in the post-soviet states is legitimized in Russian geopolitics because of these ethnic Russian minorities as it was discussed in the previous parts of the thesis.

To sum up this chapter, it is possible to argue that the post-soviet Lithuania fits into the theoretical framework of the nation-building and geopolitical thinking of the post-soviet states. The nation-state was re-build by turning back to “the Golden Age” of Lithuania, the history of interwar statehood and Lithuanian culture and language. Moreover, the political elites in independent Lithuania immediately turned away from any association to the Soviet Union and established Russia as the biggest security threat. The citizenship politics after 1991 and the Constitution of Lithuania reflect these notions of the nation-building in post-soviet Lithuania. The restriction of dual citizenship is also one of the expressions of such perceptions and is analyzed in the next chapters.

## **9. The politics of dual citizenship in Lithuania**

The politics of the dual citizenship in Lithuania are currently and persistently debated issue in the media, forums, public sphere. However, the arguments for and against the dual citizenship in Lithuania are not analyzed consistently and throughout, and there are many speculations regarding the political decisions made to regulate the acquisition of the dual citizenship. This section of the thesis aims at explaining the resistance to dual citizenship in Lithuanian politics using the information collected during expert interviews and relating them to the theoretical framework of the nation-building and citizenship politics in the post-soviet nation states.

## 9.1. The context

The regulation of the dual citizenship began as early as 1991 law on Citizenship and the Constitution of Lithuania adopted in 1992. Both of these legal documents state that the citizen of Lithuania may not be citizen of another state at the same time. The article 12 in the Constitution states:

Citizenship of the Republic of Lithuania shall be acquired by birth and other grounds established by law.

With the exception of individual cases provided for by law, no one may be a citizen of both the Republic of Lithuania and another state at the same time.

The procedure for the acquisition and loss of citizenship shall be established by law (The Constitution of the Republic of Lithuania).

It is interesting to note that while the acquisition of the Lithuanian citizenship is not specified that much in the Constitution, there is this sentence about the restriction of dual citizenship. It can be argued that this restriction, which is stated in the supreme law in Lithuania, tells us something about how dual citizenship was understood by the political authorities in 1992 and what kind of implications for Lithuania it was perceived it had.

The most common cases when Lithuanian citizen may be the citizen of another state include:

- he has acquired citizenship of the Republic of Lithuania and citizenship of another state at birth and he has not reached 21 years of age;
- he is a person who was exiled from the occupied Republic of Lithuania before 11 March 1990 and acquired citizenship of another state;
- he is a person who fled the Republic of Lithuania before 11 March 1990 and acquired citizenship of another state;
- he is a descendant of a person who was exiled or fled from the occupied Republic of Lithuania before 11 March 1990;

- he has acquired citizenship of the Republic of Lithuania by way of exception while being a citizen of another state;
- by virtue of marriage to a citizen of another state he has *ipso facto* acquired citizenship of that state (Law on Citizenship, Article 7).

It is clear that the allowance of dual citizenship in Lithuania is also related to the continuation and restoration of the Lithuanian citizenship if it was lost during the Soviet Occupation. In most of the cases when the dual citizenship was acquired according to the criteria mentioned above, those people were of Lithuanian ethnicity and descent.

This list does not include the right to dual citizenship for the Lithuanian citizens who left Lithuania after the 11 March 1990 and this is the reason why the whole debate has started after the emigration from Lithuania intensified from 2004. The Lithuanian emigrants have raised the demand to be allowed to have dual citizenship because they are ethnically Lithuanian and therefore, they should not be deprived from the Lithuanian citizenship if they acquire another state's citizenship. The issue of the dual citizenship is persistently raised by the Lithuanian World Community as well as other Lithuanian communities residing in Europe, mostly in the member states of the EU. The arguments for the liberalization of the dual citizenship from the emigrants' perspective include: the economic gain for the state of Lithuania because of the remittances that emigrants send to their families residing in Lithuania, the chance to enrich Lithuania's cultural life, and the knowledge and expertise that emigrants gain and by doing so they may contribute to Lithuania. In other words, dual citizenship for Lithuanian emigrants would be beneficial for Lithuania. What is more, it is argued that for such small state like Lithuania, it should be essential to ensure that the number of citizens is not decreasing. Lithuanian emigrants encourage politicians in Lithuania to change the regulation of dual citizenship by introducing certain provisions in the law on Citizenship and the Constitution (Narušienė, 2012).

The Constitutional Court of Lithuania in 2006 has ruled that according to the Constitution of Lithuania the cases when the Lithuanian citizen is citizen of another state should be extremely rare and therefore, it cannot become a norm. The only way to change the regulation of the dual citizenship in Lithuania is to change the article in the Constitution which forbids (except the cases mentioned above) it. It has been argued that there is no other way to change this regulation because if there are no changes in the Constitution regarding this question, all other provisions of law on Citizenship will be conflicting with the Constitution. The only way to change the Constitution is by referendum (The Constitutional Court of the Republic of Lithuania, Case No. 45/03-36/04, 2006).

Having stated that the main restriction of dual citizenship in Lithuania is established in the supreme law – the Constitution, I now turn to the following questions. First of all, why there is this restriction of the dual citizenship in the Constitution? In other words, what circumstances might have influenced this particular regulation of the dual citizenship in the Constitution in 1992? Second of all, why the needed changes of the regulation of the dual citizenship in the Constitution are not initiated now?

## **9.2. Analysis of the experts interviews: explaining the resistance to dual citizenship in Lithuania**

The main topics that I tried to cover while conducting interviews include the understanding of what citizenship is and how is it different from dual citizenship, the advantages and disadvantages of the dual citizenship for the state, and the circumstances or events that effected the regulation if citizenship and dual citizenship in Lithuania in years 1991 – 1992 and why there are no changes regarding regulation of dual citizenship now.

### 9.2.1. The understanding of citizenship and dual citizenship

All the respondents were asked the question: How do you understand what citizenship is? The answers to this question varied slightly because different aspects of citizenship were emphasized, however it was mentioned by all respondents that citizenship is the relation between an individual and the state:

*“Relation between a human and a state which creates an amount of rights and duties.”*  
(Respondent 1)

*“It is the relation between a man and a state, relation between citizen and state and this relation creates, in this relation emerges person’s rights and duties to the state and other citizens as well as state’s duties to the person, the citizen. This is mutual relation.”* (Respondent 2)

*“I understand citizenship through commitment to the state whose citizen you are.”* (Respondent 3)

*“For me it is the relation with the state, mutual obligation.”* (Respondent 5)

*“The shortest way to explain this – membership.”* (Respondent 6)

*“It is a social relation which determines relation among people living in the same territory, the state. The citizenship is the social institution which makes social relation into legal one. A formal institution which includes social relations.”* (Respondent 7)

*“The citizenship is a political relation between the person and the state.”* (Respondent 8)

The answers to the question how respondents understand what dual citizenship is include:

*„Duties and your duties to two states. There is not much discussion about this. How to explain. It is very funny to me to be honest. This is not comparable at all. Duties to two states. One citizenship is one citizenship, dual is dual.”* (Respondent 1)

*„serving to two states”* (Respondent 3)

*“It is the obligation to two states.”* (Respondent 5)

*“Dual citizenship is the problematic thing”.* (Respondent 7)

*“Dual citizenship means dual political dependence. Dual loyalty.”* (Respondent 8)

When asked whether they see a contradiction when the person is a dual citizen, all the respondents answer positively. According to these answers it may be argued that the concept of dual citizenship is somehow not established itself yet in the political thinking of Lithuanian politicians. There is the opposition to the dual

citizenship. It is not being thought as the right thing. After I heard all the answers to these questions, I have realized that an interesting hypothesis may be raised: the resistance and opposition to dual citizenship in Lithuania exist because the concept of the dual citizenship is perceived as contradictory and unacceptable. It is reasonable to think that there would be no changes in the regulation of the dual citizenship as long as the concept of the dual citizenship is seen as somehow contradictory to what citizenship is believed to represent. Almost all respondents expressed concerns about the dual loyalty and questioned whether it is even possible to be loyal for two states.

### **9.2.2. The circumstances that influenced the creation of the Constitution and the law on Citizenship**

I argue that the circumstances which influenced the regulation of dual citizenship are important to analyze because they may lead to a better understanding of the nation-building processes in post-soviet Lithuania and explanation of the restriction of dual citizenship.

The answers to this question provided an insight of the reasons for such strict regulation for dual citizenship in the Constitution in 1992. These reasons were related to the issues of the geopolitical insecurity in post-soviet Lithuania and perceived threats at that time. These threats included ethnic minorities residing in the territory of Lithuania shortly after independence and their questioned loyalty, as well as the fact that Russia was perceived to be the biggest threat at that time. The biggest fear was that the independence is still uncertain or that independent Lithuania will soon fall under the influence of Russia.

Some of the answers to the question “what circumstances might have influenced the regulation of Lithuanian citizenship and dual citizenship in years 1991-1992?” are as follows:

*“Well there was... when the laws were being written... [...] I think there was always fear. Fear of threats. From that neighbor of ours nearby, and that law was written in that way that persons from ex - Soviet army in Lithuania would not be able to get citizenship that easily.” (Respondent 1).*

*“I believe it was very difficult times and there was a lot of fear around 1992. The Red Army was still in Lithuania’s territory at that time.” (Respondent 2)*

*“We lived in the political situation that we had and what we have now. Political situation then and even now is not entirely secure. Of course I am not a paranoid person but I think that certain security measures are necessary.” (Respondent 3)*

*“Our citizenship law is the result of our historical and political past. Having this in mind, I have to say, that we simply cannot have more inclusive and liberal law. I hardly imagine that. Especially, when you have in mind the circumstances in which we gained our Independence in 1990.” (Respondent 3)*

*“There was a wish to distance and disassociate from any kind of external impacts. For example, we were afraid that Russians will come, will have citizenships, will effects our politics, will have impact on everything. Therefore, what was written in 1992 was a certain self-defence action.” (Respondent 4)*

*“The circumstances. Right, the army of another state still was in Lithuania. The state was just created and it tried to defend itself by all means possible.” (Respondent 5)*

*“The Constitution is full of fears. There is even a paragraph in the Constitution saying that Lithuania will not join certain organizations, meaning Commonwealth of Independent States, this was done obviously because of fear, and I think you will not find anything like this in any other Constitution of any other Eastern European state. This fear, I think, was ill-founded and lifted to the Constitutional level. This was unique, actually. If you see this fear, you can relate it to restrictions of dual citizenship in Lithuania. For me it is very funny when the norm starts with a word „no one“. You can understand easily how much fear and negativity is there.” (Respondent 6)*

So many answers are presented here in order to show that the geopolitical fear of Russia and the need to trust the citizens in the early years of the nation-building processes had a significant impact on the regulation of the dual citizenship in the post-soviet Lithuania. Both nation-building in the post-soviet Lithuania and the citizenship politics were greatly influenced by the geopolitical insecurities and the Soviet legacy – The Russian minority residing in the Lithuania.

### **9.2.3. The resistance to change the regulation of dual citizenship nowadays**

The strict regulation of the dual citizenship in the post-soviet Lithuania in 1991-1992 is explained by the geopolitical insecurity that influenced nation-building and

citizenship politics, but what about the resistance to the dual citizenship these days? The context is quite different now, the independence of Lithuania is secured and Lithuania is a member of the EU and NATO. What is more, dual citizenship became much more relevant because of large extent of emigration and emigrant's expressed demands for changes in the regulation of the dual citizenship. Therefore, it is important to ask: why there are no changes in the regulation of the dual citizenship despite the changed circumstances and the secured statehood of Lithuania?

The answers from the respondents to this question revealed several reasons. One of them is still being the perceived insecurity and threats related to Russia and Russian minority in Lithuania. It is feared that if the dual citizenship is liberalized the Russian minority would also acquire Russian citizenship and consequently, Russia would interfere with Lithuania's political life or even organize a military intervention like it happened in 2008 with Georgia.

*“So, if today you would read official foreign affairs doctrine of Russia, you would see that the security and physical defense of ethnic Russians in foreign territories is one of the most important objectives. They do not care if you are also a citizen of other state; they are committed to defend Russian citizens at all costs. Therefore I think that in the environment we live in it would be a threat to national security to allow dual citizenship in this case.” (Respondent 3)*

*“I would think about the fact that, I don't know, 5000 or 10 000 Russians now live in Lithuania. Maybe less, I don't remember. Suddenly, there is 50 000 Russian citizens in Lithuania and what happens? Our neighbor says that we are violating the rights of Russian citizens and they send something here. A couple of trucks with troops. Of course I am being a little bit sarcastic now but there is truth in this.(Respondent 5)*

*“The citizenship may be politized matter in foreign affairs and everything depends on good relations between neighbor states. If the relations are not good, threats are bigger. The example that everybody gives now is conflict between Georgia and Russia that happened in 2008. If the state wants to defend its citizens in another state and if relations are historically complicated, there is a source for conflict.” (Respondent 6)*

*“In some states dual citizenship does not pose any serious risks. In case of Lithuania, there are some risks. Lithuania is in inconvenient geopolitical situation. We are independent for more than twenty years but if we look at last, I don't know, two hundred years, we were not so independent. The essential thing is such a thing as Russia. Dual citizenship in case of Lithuania may open the way to*

*some threats. Dual loyalty for Poland or Russia wouldn't be the best thing for Lithuania.”*  
(Respondent 7)

It may be argued that the reasons for strict regulation mentioned above are stated clearly by the respondents, another possible reason for the resistance to dual citizenship was a bit harder to grasp from the context. Almost all of the respondents argued that the current situation of the dual citizenship in Lithuania is not a problem at all. While all of the respondents were familiar with the demands by emigrants, only two of them agreed that the regulation of the dual citizenship should be liberalized. Other respondents did not agree that the emigration from Lithuania is a problem and that liberalization of the dual citizenship is one of the ways to sustain the nation. The dominating opinion was that the acquisition of another state's citizenship is a conscious decision made by the individual. It was argued by the majority of the respondents that the Lithuanian citizenship is not needed if a person does not live in Lithuania, does not participate in its daily life and that proliferation of the dual citizenship for Lithuanians would end up in the question of political participation in elections if persons are dual citizens and do not live in Lithuania: who and how will govern Lithuania?

At the same time, all of the respondents agreed that the whole situation of the debates and speculations regarding the politics of dual citizenship in Lithuania have become somehow ridiculous and changes need to be initiated and decisions need to be made. The lack of political will to solve this issue was mentioned several times, as well as, the need to make final decisions regarding the regulation of the dual citizenship, whether to liberalize it or leave everything as it is and stop all the speculations and discussions once and for all. The only way to change the regulation of the dual citizenship that was mentioned by all respondents is the changing of the Constitution. In Lithuania this can only be done by referendum. For referendum to be successful more than a half of all the citizens of Lithuania have to vote. However, most of the respondent doubted the success of the referendum because probably not enough citizens would come to vote.

*“If we decide that we want to change that – referendum is our only choice. We have to tell ourselves the one and last time that our Constitution does not fit into the realities of nowadays. The world and Lithuania have changed since then. We have to acknowledge that the way we have written our Constitution is too strict. So, let’s change it.” (Respondent 5)*

*“First of all, technically it is impossible to organize referendum successfully. Secondly, we have very low participation of citizens in these kind of things, so, probably the referendum would not be even called as happened because not enough people would come to express their opinion. But I see referendum as an option for all this circus that is happening.” (Respondent 4)*

*„I will repeat myself – if we decide that our current regulation does not fit the reality we are living it, we should try to change it. But it is really difficult to change it. So, if we would have invested more time in this, I speak here as a private person, do not mention my name and do not quote me, so if we decide that are arguing about this since 2006, seven years have passed, so if we would have invested so much energy in solving this questions as we have spent arguing, I believe, the referendum would have already happened.” (Respondent 5)*

*„The referendum has a chance of not happening because there may be not enough citizens who would come to vote. But the referendum is the only way which is mentioned in the Constitution and all other ways are deceiving. We should not kid ourselves. We cannot cheat the Constitution. We have to play according the rules we created in the Constitution. If people want to change dual citizenship regulation, everybody has to sit down and discuss all the pros and cons of this instead of causing hysteria which was done in Lithuania.” (Respondent 8)*

*“Make the referendum law so that the referendum could actually happen because at this point this law practically makes referendum impossible. Especially with the extent of emigration. There would not be enough people to vote. Fix the referendum law, have the referendum about dual citizenship and that is it.” (Respondent 1)*

To conclude, the resistance to dual citizenship in Lithuania nowadays may be also explained through the geopolitical insecurity which is still perceived to exist from Russia and Russian minority even more than 20 years later after re-gaining Independence. Such long-standing perception that Russia is still a threat to the state of Lithuania shows how traumatizing was the Soviet occupation and how this perception still effects the political decision-making or lack of it.

What is more, it is agreed that the speculations and debated about the regulation of the dual citizenship in Lithuania has to end and political decisions have to be made either to liberalize dual citizenship or leave the current regulation. The dominating

view is that the dual citizenship is not necessary for Lithuanian emigrants and therefore, the situation of the regulation of dual citizenship is not even a problem. However, because of the ongoing debates and speculations about this, all respondents mentioned that the political decisions regarding dual citizenship need to be made in order to stop this never-ending debate.

## **10. Conclusions**

The objective of this thesis was to explain the opposition and resistance to dual citizenship in Lithuania. The problem of the thesis was: despite the large emigration extent and emigrant's demands, debates in the media and public sphere, there are no changes made in the regulation of the dual citizenship in Lithuania. While most of the European states seem to liberalize and allow dual citizenship for their citizens, the regulation of the dual citizenship remains strict in Lithuania since the first regulations of citizenship and dual citizenship appeared in 1991-1992.

The politics of citizenship and resistance to dual citizenship in Lithuania were analyzed using the theoretical framework of the nation-building and geopolitical thinking in the post-soviet states. It was revealed that the politics of citizenship, which included the strict regulation of dual citizenship, was one of the most important strategies of the processes of the nation-building and were greatly influenced by the geopolitical insecurity and perceived threats from Russia and Russian minority in Lithuania. The nation-building in the post-soviet Lithuania was carried out under the perceived conditions of the geopolitical threat from Russia. The restriction of the dual citizenship in Constitution was supposed to be a mechanism which was created to secure the independent statehood of Lithuania.

Having established that the restriction of the dual citizenship is stated in the Constitution of Lithuania and reasons for that analyzed and revealed, it was turned to the following question: why there is no political change regarding dual citizenship

now when the context has changed and the statehood of Lithuania is secured? The interviews revealed several reasons which may be argued to have influenced the non-making of the political decisions regarding dual citizenship. First of all, according to the respondents, concept of dual citizenship is perceived to be contradictory in Lithuania, and therefore, dual citizenship is not seen as something necessary for the Lithuanian emigrants. Second of all, the resistance to the dual citizenship in Lithuania is still related to the perceived geopolitical threat from Russia and questioned loyalty of Russian minority in Lithuania. Even though there were no conflicts regarding Lithuanian citizenship and this particular minority. The persistence of such perceptions reveals how traumatizing the experience of the Soviet occupation was and how it is still influences the politics of citizenship in Lithuania.

Therefore, the initial propositions of this research appear to be correct. The resistance to dual citizenship in Lithuania can be explained through the perceived geopolitical insecurity and threats related to Russia which is strengthened because of the Russian minority residing in Lithuania.

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## **12. Appendix 1**

### Interview questions

- 1) How do you understand citizenship? What does it mean to you?
- 2) How do you understand dual citizenship?
- 3) Who should have a right to dual citizenship?
- 4) What do you think about Lithuania's citizenship laws? What circumstances might have influenced it?
- 5) Do you think the issues of citizenship are the field of legal system exclusively?
- 6) What do you think about emigration extent from Lithuania?
- 7) Are you aware of the demands of the Lithuanian emigrants and their demands?
- 8) What do you think would be advantages and disadvantages if the dual citizenship is accepted more widely in Lithuania?
- 9) Why do you think there is little change regarding dual citizenship politics in Lithuania?
- 10) What is your personal opinion about this? Are you for or against?