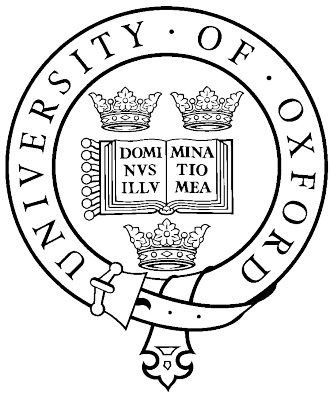
The Annexation of Populations: A New State Strategy?



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Abstract

This thesis aims to analyse the extraterritorial naturalisation practices of Russia and Hungary to determine the states' motivation and the domestic and international consequences of the policies. At the individual level, it remains a state's legal prerogative to confer citizenship upon whomever it wishes consensually. When done to an extraterritorial collective, the practice can and has caused disputes between states. Russian and Hungarian state officials defend the practice by arguing the conferral of citizenship is a legal manifestation of a responsibility to privilege co-nationals, wherever they may reside. While this position cannot be entirely dismissed, it is argued that it lacks sufficient explanatory power and that strategic and instrumental motivations are fundamental to the practice. Research in International Relations has so far neglected to investigate citizenship policies from a strategic foreign policy perspective, a shortcoming this thesis seeks to address. Using a case study qualitative research design involving fifty-two interviews with political stakeholders and an official state discourse analysis, it shows that Russia and Hungary have made international and domestic gains by naturalising targeted populations in their contiguous states, which can be metaphorically described as an annexation of populations. The official state discourse from the leaders of Russia and Hungary relating to external populations and territory are found to exhibit similarities. This thesis offers an emotive analogue that the extraterritorial naturalisations are justified as a means to rectify perceived injustices at historical losses caused by external rivals. The significance of this study is that it informs our theoretical understandings of key concepts of International Relations by focussing on the implications of extraterritorial naturalisation on sovereign territorial integrity, the nation, (dual) citizenship and will interest constructivists and realists and those interested in international law.

Acknowledgements

First and foremost, I wish to give my sincere thanks to my supervisor Professor Neil MacFarlane who provided a vast amount of considerate review of my work. Without his brilliant insight and thought-provoking comments, this work would not have been possible. He was there throughout and am extremely grateful for his support. His forensic examination of my evolving work allowed me to better structure my thoughts and ideas and challenged me to think critically about my arguments, conceptualisations, and ontological and epistemological beliefs.

In March 2014 I was in attendance in a theatre hall in The Hague listening to a lecture given by Professor André Gerrits as part of a series on the collapse of the Soviet Union as part of my undergraduate degree at Leiden University. Russia had just annexed Crimea. On a presentation slide, Professor Gerrits briefly mentioned that Russia had rapidly distributed their passport to the population of Crimea. Little did I know that this slide would be the planting of the seed that would later bloom into doctoral research into the topic. I wish to thank him for his great lecturing and for the several letters of recommendation which would later to allow me to pursue this interest.

In continuing with the analogy, if Professor Gerrits planted the seed of interest, it was Associate Professor Darshan Vigneswaran, Co-Director of the Institute for Migration and Ethnic Studies and Associate Professor at the Department of Political Science, at the University of Amsterdam. They both nurtured and guided my interest into something fruitful. I am very grateful to Darshan who supervised my master's thesis and helped develop my topic of interest. His passion for his field rubbed off on me, and without such inspiration, I would not have attempted a DPhil in International Relations. I would also like to thank Professor Marlise Glasius and Adele Del Sordi whose guidance during my time as a student and later junior researcher at the University of Amsterdam; they were hugely influential in helping me become a better scholar and academic.

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I would also like to thank Robert Bognar for his review and comments during the latter stages of this thesis writing process, his considered and time-consuming evaluation of my work helped enormously during a difficult time for all.

Last but not least, I would like to thank my parents Bryan and Laura Wrighton, my brother Oliver Wrighton, and my partner Judith Begeer for their loving support during my DPhil and elsewhere.

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List of abbreviations

AISSR - Amsterdam Institute for Social Science Research
ARD - Working group of the public broadcasters of the Federal Republic of Germany
BBC – British Broadcasting Company
CIA – Central Intelligence Agency (US)
CIS – Commonwealth of Independent States
CSTO - Collective Security Treaty Organization
CSV - Comma-separated values
CUREC - Central University Research Ethics Committee
DK - Democratic Coalition (Hungary)
DPR – Donetsk People's Republic
EMNP - Hungarian People's Party of Transylvania
ESRC - Economic and Social Research Council
EU – European Union
EUDO - European Union Democracy Observatories
EUR - Euro
FKZ – Federal Constitutional Laws (Russian)
FMS – Federation Migration Service
FZ – Federal Law (Russian)
HQ – Headquarters
HUF – Hungarian Forint
HzDS - Movement for a Democratic Slovakia
ID - Identification
IT – Information Technology
JPKF - Joint peacekeeping force (Russo-Georgian war)
KDNP - Christian Democratic People's Party (Hungary)
KMKSZ - Transcarpathian Hungarian Cultural Association
LEOM - Limited Election Observation Mission
LPR – Luhansk People's Republic
MEP – Member of the European Parliament
MFA – Ministry of Foreign Affairs
MKP/SMK - Party of the Hungarian Community (Slovakia)
MM - Hungarian Movement (Serbia)
MMP - Hungarian Civic Party (Romania)
MP – Member of Parliament
NATO – North Atlantic Treaty Organization
NGO – Non-governmental Organisation
NSKI - Hungarian Research Institute for National Strategy
OCMA - Office of Citizenship and Migration Affairs (Latvia)
ODIHR - Office for Democratic Institutions and Human Rights
OSCE – Organization for Security and Co-operation in Europe
PM – Prime Minister
RAPSI - Russian Legal Information Agency
RMDSZ/UDMR - Democratic Alliance of Hungarians in Romania
RSFSR - Russian Soviet Federative Socialist Republic
SNS - Slovak National Party
SSU - Security Service of Ukraine
TV – Television
UAE – United Arab Emirates
UK – The United Kingdom of Great Britain and Northern Ireland

UKRI – United Kingdom Research and Innovation
UN – United Nations
UN DESA – United Nations Department of Economic and Social Affairs
US – United States of America
USSR - Union of Soviet Socialist Republics
UT – Ukrainian Television
VMDP - Democratic Party of Vojvodina Hungarians
VMSZ - Alliance of Vojvodina Hungarians
WTO – World Trade Organisation
ZDF – Second German Television

Introduction

The topic, the puzzle, and the question

Russia and Hungary have actively naturalised select populations beyond their sovereign territorial borders. This political phenomenon, known as extraterritorial naturalisation, is now a crucial aspect of Russian and Hungarian domestic and foreign policy. The numbers of people naturalised are significant. As of 2016, the Hungarian state has naturalised, in an expedited, incentivised process, approximately 820,000 individuals in the states contiguous to Hungary. Russia has naturalised well over 500,000 in their neighbouring territories, or 'near abroad'. But why? Why do these states conduct extraterritorial naturalisations? Some might suggest, including the naturalising states' officials, that these naturalisations are undertaken as a tangible manifestation of the naturalising state's obligation to 'their' external populations.[1] Others might point to privileging co-ethnics as the motivation behind the political phenomenon.[2] However, while these two alternatives explanations carry some explanatory weight, it is argued here that the extraterritorial naturalisation of populations, feasible because of structural, legal conditions, is implemented strategically with implications for state reach and the state polity. The variation in the location of application of the state-initiated policy on external populations hints at an underlying strategic element. We would expect state

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[1] See for example, Sertan Akbaba, "Russian Post-Nationalism or Pan-Ethnicity? The Case of Compatriots in South Ossetia, Abkhazia and Crimea," *Boğaziçi Journal* 32, no. 2 (2018).; George Schöpflin, *Nations, Identity, Power: The New Politics of Europe* (C. Hurst & Co. Publishers, 2000). See the discussion about Russia's relationship with Russians outside of the country in, Neil Melvin, *Russians Beyond Russia* (A&C Black, 1995). Also see the discussion about the perceived co-ethnic obligation of the Hungarian state in, Agnes Batory, "Kin-State Identity in the European Context: Citizenship, Nationalism and Constitutionalism in Hungary," *Nations and Nationalism* 16, no. 1 (2010).

[2] Pål Kolstø and Helge Blakkisrud, *The New Russian Nationalism - Imperialism, Ethnicity and Authoritarianism 2000 - 2015* (Edinburgh University Press, 2016).; Zoltán Kántor, "Reinstitutionalizing the Nation–Status Law and Dual Citizenship," *Regio-Minorities, Politics, Society-English Edition* 8, no. 1 (2005).; Laure Neumayer, "Symbolic Policies Versus European Reconciliation: The Hungarian 'Status Law'," in *History, Memory and Politics in Central and Eastern Europe* (Springer, 2013).

legislation to be implemented uniformly across all applicable locales; however, this is not the case in practice. What does this asymmetrical policy implementation tell us about state intent?

This chapter will be structured as follows. The introduction will contextualise and problematise extraterritorial naturalisation and provide an outline of the proposed line of argumentation. A review of the academic literature will follow, highlighting theoretical and empirical gaps and emphasising the academic and social relevance of the topic. Next will be a rationale for case selection and an introduction to methodological considerations and intentions, both of which precede the chapter's conclusion.

In recent decades, there has been a particular escalation of extraterritorial naturalisation practices, whereby states modify citizenship legislation to eventually legalise extraterritorial naturalisations at a collective level, in a simplified, expedited, incentivised process. For example, immediately following the collapse of the Soviet Union, the Russian Federation famously implemented extraterritorial naturalisation policies in many of the post-Soviet republics, particularly during the lead up to the 2008 Russo-Georgian conflict, centred on the Georgian breakaway regions of Abkhazia and South Ossetia. In recent years Russia has continued this extraterritorial naturalisation policy within eastern Ukraine and Crimea, and the Baltic States of Estonia, Latvia and Lithuania, and the breakaway state of Transnistria, legally part of Moldova. Regarding Hungary, there are many *Magyar*, or ethnic Hungarians, who populate other states whose territory overlaps with that of the former Kingdom of Hungary. The Hungarian state has naturalised these populations as well as other individuals in the neighbouring states. In both the Russian and Hungarian cases, abrupt boundary revisions resulted in 'their' populations inhabiting other states' territories, and it is this historical context that underpins the geographical selectivity of the practice.

Some might suggest that Russia and Hungary's extraterritorial naturalisations can be explained as a manifestation of a sense of obligation to, or privileging of, the nation's kin or

ethnic groupings, thus rejecting any instrumental motivations behind the practice.[3] Indeed, this position is furthered by the current political elite in both countries when stating their motivations for extraterritorial naturalisation policies. Although intent regarding policy might be multifaceted, particular contradictions in the enactment of both Russian and Hungarian instances of extraterritorial naturalisation alludes to more than just a privileging of transnational ethnic kin. The absence, rather than the presence, of extraterritorial naturalisation, may illuminate these contradictions. Russia is heavily invested in contemporary extraterritorial naturalisation practices within Ukraine, Georgia, Moldova, and the Baltic states but not, for instance, within Kazakhstan, despite potentially favourable conditions.[4] Likewise, the Hungarian state has modified citizenship legislation to permit extraterritorial naturalisations of ethnic Hungarians in its former territory, but it is not conducting extraterritorial naturalisation practices in Slovakia nor with the Hungarian diaspora in regions overseas.

Moreover, it is not only the *Magyar* populations that have received Hungarian citizenship. What motivates these decisions to selectively incorporate into the state polity populations residing in some states and not in others? This question is integral to this project's broader research question: how and why do some states naturalise populations?

This thesis's theoretical import will be to probe extraterritorial naturalisation practices concerning questions relating to state sovereignty and territorial integrity, principles enshrined in international law and the primary ordering principles of International Relations. It will also engage with theoretical concerns relating to population and extraterritoriality, international law relating to (dual) citizenship, and nationalism. In doing so, the thesis will contribute to the

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[3] See these arguments discussed in Jeremy Smith, "Historical Perceptions of Responsibility and Neighborhood in Russian Strategic Culture," in *Strategic Culture in Russia's Neighborhood: Change and Continuity in an in-between Space*, ed. Katalin Miklóssy and Hanna Smith (Lexington Books, 2019).; Zoltán Kántor, "Hungary's Kin-State Politics, 2010–2014," *Minority Research*, no. 17 (2014).;

[4] As will be discussed in detail later, large populations of ethnic Russians exist in many of the countries which make up the former Soviet Union.

meta-debates about the theoretical underpinnings of International Relations, highlighting the tensions between social constructivism and realism. The former focuses on identity constructions, whether they are regarding nationality, ethnicity, or both; the latter prioritises instrumentality, material interests, and power politics. The research will produce an in-depth study of the contemporary forms of this understudied political phenomenon.

Extraterritorial naturalisations are an intensive form of diaspora engagement policies with implications for international politics. Accordingly, this thesis is inherently interdisciplinary, concerning political geography, migration studies, diaspora engagement and power politics with an overarching contribution to International Relations scholarship.

Following this introductory section will be a chapter discussing a political and legal history of extraterritorial naturalisation which contextualises the practice. The subsequent sections will delve deeper into the structural aspects of international law and norms that enable extraterritorial naturalisation or fail to prevent it. Next will be the first empirical chapter addressing Hungary and Russia's legislative chronology concerning citizenship and naturalisation legislation while detailing the process's practical elements and how individuals and states have responded to the practices. The following chapters will detail how official state rhetoric has legitimated the practice. Then, a chapter on state and international bodies reactions to the practice will follow. Next will be two empirical chapters on the strategic gains and political consequences of extraterritorial naturalisations, each separately dealing with the Russian and Hungarian cases in turn. These chapters will precede a concluding chapter on the broader implications of extraterritorial naturalisation and the international political system.

The argument

What does it mean to say states conduct extraterritorial naturalisations? States signal their intent to engage with and naturalise external populations, implement the necessary changes to

citizenship legislation to permit this policy's enactment, and naturalise the target population. The result is a contested extension of the naturalising state's polity, defended on the grounds of its legality regarding guarding the target populations' right to self-determine their identity and nationality. Figure 1 provides a diagram of the process of extraterritorial naturalisation from the naturalising state's perspective.

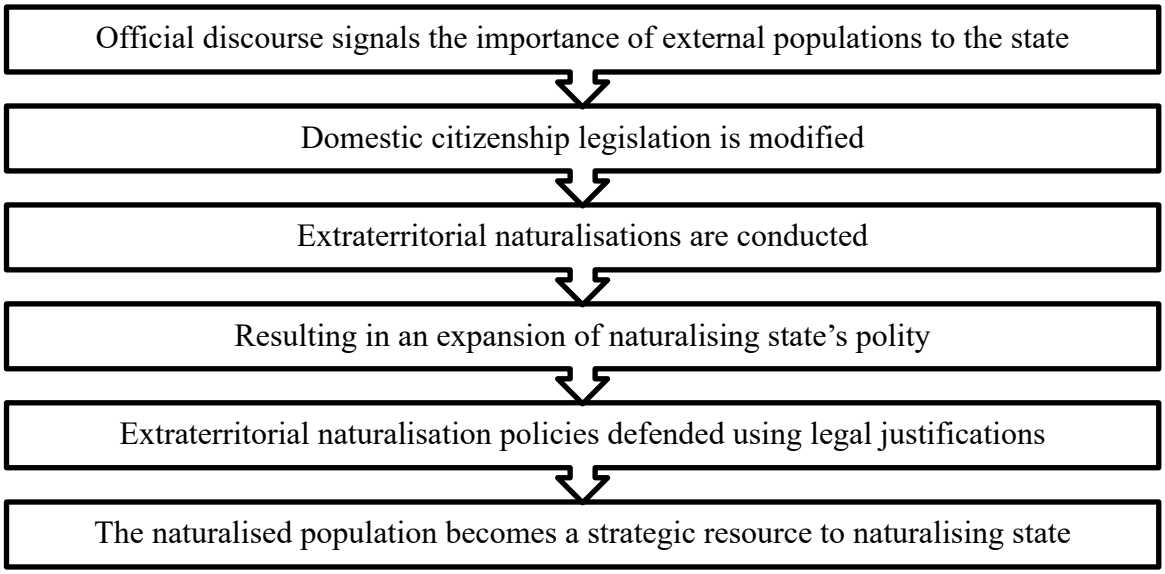


Figure 1. The extraterritorial naturalisation process

Why states conduct, extraterritorial naturalisation is perhaps a more contentious question and is the primary focus of this thesis. It is argued throughout that the extraterritorial naturalisations by Hungary and Russia are a strategic attempt for each state to make absolute or relative power gains. The practice is justified as a means to exact revenge upon a perceived enemy, a key component of regime stabilisation efforts by authoritarian regimes. The search for power is not a zero-sum game, and the components of these strategic gains occur at both domestic and international levels.

At an international level strategic gains include: 1) ethnic political party partner relationship building in the 'home states'[5] which in turn facilitate other power generation

[5] The terminology regarding extraterritorial naturalisations is not consistent. The naturalising state is sometimes referred to as the 'kin-state', 'patron state' depending on context. While the state on which naturalisations occur has been referred to as 'host state' or 'former patron state'. For the purposes of this thesis I will refer to the state

attempts; 2) a destabilisation of international rivals through the following mechanisms: a) generating a 'fifth-column' network to subvert or destabilise the 'home state', b) freezing conflicts, so the 'home state' is unable to join adversarial institutions; 3) a display of power, strength and capabilities; 4) Irredentism.

Domestically, strategic gains include: 1) attempts to reverse demographic decline through facilitating immigration, increasing potential workforce and taxation revenues; 2) an increase in eligible and loyal voters that results in domestic power consolidation – facilitated by ethnic political party partners; 3) a display of strength that helps reinforce domestic leader perception; 4) a show of support for the nation and co-nationals that generates support by the nationalistic domestic public. It is important to note that not all of these gains are evident in all of the cases.

Occasionally there might appear to be contradictions in the strategy. However, it is argued that each state is simultaneously pursuing multiple strategies, targeting different segments of a varied population at different stages, all existing under an overarching strategy; this is particularly relevant to the two apparently competing state objectives of maintaining a naturalised population on the territory on which they were naturalised while wishing to attract the naturalised population to the naturalising state. In other words, the naturalising state does not view each of those it naturalises as being of equal strategic benefit across each area of the strategy.

The diagram in Figure 2 below illustrates how the extraterritorial naturalisations conducted by Russia and Hungary have resulted in diverse but interrelated specific strategic gains with reinforcement and feedback effects occurring between some of the gains that ultimately result in international and domestic power gains.

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conducting extraterritorial naturalisations as the 'naturalising state', and the state in which the naturalisations are conducted as the 'home state'.

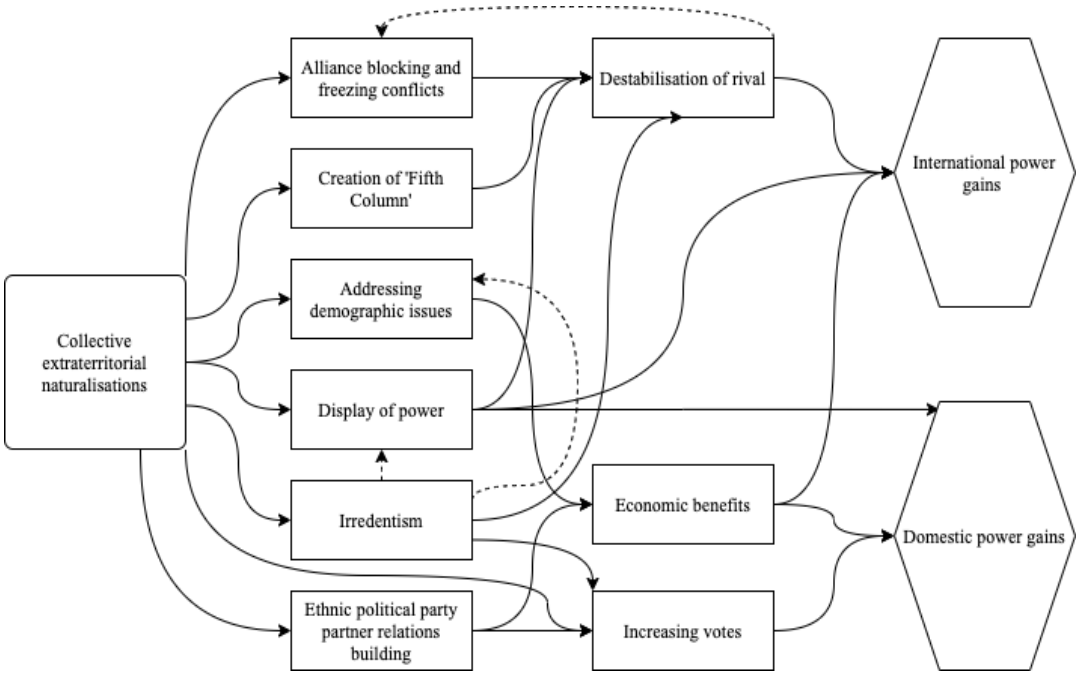


Figure 2. The impact of extraterritorial naturalisations

The notion that the extraterritorial naturalisations are conducted strategically driven by power motivations counters an alternative notion that the practices are pursued purely out of an inherent belief in the obligation to engage with and (re)incorporate populations formerly belonging to the state. In other words, extraterritorial naturalisation is down to identity or emotion.[6] The argument presented here is not in direct opposition to the counter-narrative that states conduct extraterritorial naturalisations to preserve the national identity by privileging co-ethnics; both arguments may be valid simultaneously. It is argued here that the ethnic or national preservation arguments are insufficient at explaining state motivation; extraterritorial naturalisations are a strategic practice appearing as a set of policies that are a manifestation of ethnic or identity politics.

Extraterritorial naturalisations are a conflation of a state's perceived interests regarding defining who is in, and who is out of the state; as a practice, it can serve domestic and foreign policy interests. The immediate strategic benefit of the extraterritorial

[6] For a typology of diaspora engagement policies and the range of explanatory arguments which apply to each, see, for example, Alexandra Délano and Alan Gamlen, "Comparing and Theorizing State–Diaspora Relations," *Political Geography* 41 (2014).

naturalisations is not always apparent; relative or absolute gains made at the expense of other states as a result of extraterritorial naturalisations result in the collection of 'bargaining chips' or points of political leverage to be utilised as and when states decided to employ them.

Rhetoric has been an essential facet of the justification of extraterritorial naturalisations to both a domestic and international audience, which involves a deliberate and cognitive framing of issues, by using a pseudo-historical reimagining of history to express remorse at a territorial loss and empire disintegration. Extraterritorial naturalisations are justified as a means to rectify these perceived injustices, blamed on external rivals.

There are strategic intentions similar between the two cases; at the domestic level, this amounts to a display of trans-territorial national privileging that appeases nationalist political factions and popular sentiment. At a regional or international level, states conduct extraterritorial naturalisation to advance political leverage and capital in a foreign state. Significantly though, in each instance of this practice, the consequence is an expansion of the naturalising state's polity beyond its consolidated borders into foreign states; this results in a population overlap, to the detriment of diplomatic inter-state relations in some instances, as occurred between Russia and Georgia, or Hungary and Slovakia for instance.

Geography underpins the strategic utility of the targeted populations. With regards to the Russian case, the naturalised Abkhaz and Ossetian people are not ethnically Russian.[7] Ethnicity was not the salient aspect; instead, it is the strategic utility of the peoples and the territories to the naturalising state that was important. Likewise, although ethnicity appears to be a prominent issue with regards to the Hungarian case, it alone is not sufficient in explaining the practice, as only ethnic Hungarians who resided in the territories that make up the former Kingdom of Hungary, as shown in Figure 3 below, and not those living outside

[7] The Abkhaz and Ossetian populations were naturalised by Russia in 2008 but are not ethnically Russian and were arguably only culturally tied to Russia because of the enduring effect of the Soviet Union, meaning Russian is the most predominant language spoken by these communities.

this area, were eligible to receive Hungarian citizenship in this simplified manner. Moreover, the Hungarian state has also naturalised some non-ethnic Hungarians within these regions.

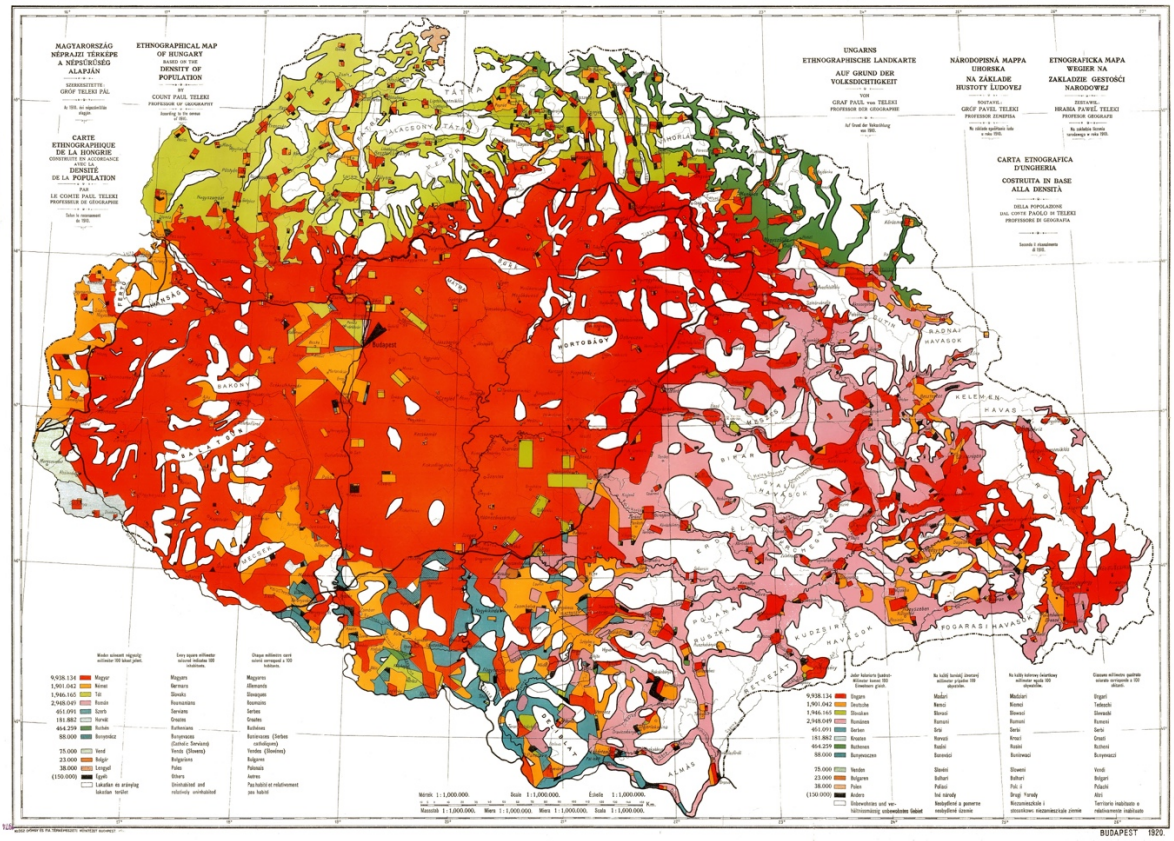


Figure 3. Ethnographical Map of Hungary based on the density of population in 1919[8]

The internal logic of extraterritorial naturalisation is contingent on historical context, which is revealed in an interview by a fascinating quote from an ethnic Hungarian, Serbian professor in Budapest:

> My father and I were born in two different countries, him in Hungary and myself in Serbia. You might not consider this to be strange, but when I tell you that we were born in the same house, you might begin to understand the difficulty in the relationship [between Hungary and the *Magyar* in the neighbouring states].[9]

[8] Map by Pál Teleki from 1918. Dániel Zoltán Segyevy, "100 Years of Carte Rouge-a Hungarian Ethnographical Map by Pál Teleki," *Abstracts of the International Cartographic Association* 1 (2019).
[9] Personal interview with Professor Tibor Varády, Central European University in Budapest, Hungary on 18 May 2017. See Interview_ID_36_Tibor_Varady at https://reshare.ukdataservice.ac.uk/854598/

Viktor Orbán, the Prime Minister of Hungary, echoes this sentiment, 'the history of the Hungarian people over one thousand one hundred years in the Carpathian Basin appears to be unfathomably intricate and complex.'[10]

Extraterritorial naturalisation policies have been made possible by structural and systemic changes brought about by the legal tensions in understandings of sovereignty regarding territory, population, and nationality in the post-communist era. Some states engaging with extraterritorial naturalisation practices infringe on other states' territorial sovereignty justifying this on the grounds of defending or protecting 'their' national minorities abroad. This extension of the nation, and the state polity, creates complex intersections where the naturalising state can claim to preside over a population within another state's territorial jurisdiction.

International law has been inadequate at regulating extraterritorial naturalisation practices for several reasons. First, although there is some disagreement between the international legal community and political scientists regarding what constitutes hard and soft international law,[11] fundamentally the international legal framework exists without any operative retribution for digressions of this nature. The result is that if a state objects to another states' extraterritorial naturalisation policies, they can do little to halt the practice besides modifying domestic legislation. Second, international law sources are predominately limited to bi-lateral contractual agreements mediated by international bodies such as the World Trade Organisation (WTO) or the European Union (EU).[12] The United Nations (UN) Security Council's resolutions which trigger genuine military consequences might also be

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[10] Viktor Orbán, "Viktor Orbán's Speech on the Anniversary of the Hungarian Revolution of 1848. 15 March 2015," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/viktor-orban-s-speech-on-the-anniversary-of-the-hungarian-revolution-of-1848.
[11] For international lawyers, treaties, ius cogens and conventions are considered 'hard' law. In contrast, political declarations have some 'soft' value as law but are not binding. There is a distinction between international law institutions such as NATO, a treaty-based organisation based on formal commitments, and the OSCE, which focuses on political responsibilities that have some binding qualities but are not hard. For a detailed discussion on the differences between hard and soft forms of international law see Kenneth W Abbott and Duncan Snidal, "Hard and Soft Law in International Governance," *International organization* 54, no. 3 (2000).
[12] Ibid.

considered a form of hard international law; however, as Russia holds a veto in the council, extraterritorial naturalisation is not likely to result in any action by the UN security council. Third and perhaps most importantly, it remains a state's prerogative to naturalise whomever it wishes.[13] Therefore, the practice can be defended on the grounds of a sovereign exercising their right to formulate and practice their citizenship legislation as they see fit. For these reasons, the effectiveness of extraterritorial naturalisation as a strategy is contingent on the unconsolidated, soft nature of international law regarding citizenship and naturalisation.

National identity is persistently in flux; identities are not essentialist and are formed from the 'top-down' initiated discursive and deliberate attempts to (re)construct this national character and the 'bottom-up' where individuals reject or accept these identities. The extraterritorial naturalisation process, and the rhetoric and salient discourse accompanying it, is a lens through which to view this construction of state membership criteria. These identity and membership requirements are reified through discourse and policies continually.

Extraterritorial naturalisation is highly contingent on bottom-up 'buy-in'. The targeted peoples have agency in this process and must enact this agency to legitimise extraterritorial naturalisation. In other words, individuals do not have to accept Russian or Hungarian citizenship. A state might force passports upon a domestic population, as a means to identify them, but does not have the same coercive leverage with external populations and thus citizenship states can only offer their citizenship to external communities. Nevertheless, incentivising naturalisation has created a form of structural coercion, which increases the rate of the acceptance of citizenship conferral.

This thesis, therefore, offers a novel explanation of citizenship, driven by a realist, power-political, and strategically instrumental logic, which is not structurally determined, but

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[13] Daniel C Turack, *The Passport in International Law* (Lexington, Massachusetts: Lexington Books, 1972); Anne Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction," *German Yearbook of International Law* 53 (2010).

Machiavellian in nature, as citizenship in these cases is serving both the domestic and external interests of elites.

Literature and relevancy

The implementation of extraterritorial naturalisation policies modifies the boundaries of the state membership, but the question of who is in and who is out of a state is not a new one.[14] States continually develop policies that explicitly define whom they include within the state and whom, are, therefore, excluded.[15] Engin Isin asserts that 'states define who their citizens are and exert control over their life and movements.'[16] How a state determines the borders of its members might seem obvious but involves a network of concepts, that vary from state to state. It is not within the scope of this thesis to redefine or re-conceptualise how we ought to categorise the political containers to which individuals belong. However, it is vital to provide some clarity in use for the highly interrelated terms, which are preeminent within the rhetoric surrounding extraterritorial naturalisations and the counterarguing the argument presented in this thesis.

The terminology regarding the entities that make up the international system and initiate and consolidate the categorisation of the world's people into political communities is often complicated with overlapping meanings. Perhaps the most obvious starting point is the state itself. As defined by Weber, the state is a polity that maintains a monopoly on the use of violence or legitimate use of physical force[17] within an organised territory. Often and

[14] For an analysis of the history of state membership inclusion and exclusion see, Rogers Brubaker, "Migration, Membership, and the Modern Nation-State: Internal and External Dimensions of the Politics of Belonging," *Journal of Interdisciplinary History* 41, no. 1 (2010).
[15] Engin F Isin and Bryan S Turner, *Handbook of Citizenship Studies* (Sage, 2002).; Ruth Wodak, "Us' and 'Them': Inclusion and Exclusion–Discrimination Via Discourse," *Identity, Belonging and Migration* (2008); Isin and Turner, *Handbook of Citizenship Studies*.
[16] Engin F Isin, *Citizens without Frontiers* (Bloomsbury Academic Publishing, 2012).
[17] Max Weber, David S Owen, and Tracy B Strong, *The Vocation Lectures* (Hackett Publishing, 2004).

erroneously the term 'state' is coupled with another form of a political unit, the nation, to form the now ubiquitous hyphenated term the 'nation-state'. However, this hyphenated term is empirically troublesome given there are few states within the international political order that are simultaneously nations.[18] In historicising the terminology of polity entities, Renan suggests that people have mistakenly transposed concepts from smaller historical political units to contemporary larger ones, thus creating confusion. Furthermore, he asserts, 'today, a graver mistake is made: race is confused with nation, and a sovereignty analogous to that of really existing peoples is attributed to ethnographic or, rather linguistic groups.'[19] This muddling of concepts is not only an academic concern but features prominently in political discourse in rhetoric about the contents and members of political entities. As Anderson argues, is not accidental or a mistake, but is part of a deliberate political project.[20]

If then, a state is not necessarily a nation, and a nation not necessarily a state, what is a nation? Connor argues that given that as a nation is, in essence, intangible, it is therefore hard to define.[21] Benedict Anderson famously echoes this sentiment by defining a nation as an 'imagined community.'[22] Connor concedes that the meaning of the term has changed but maintains that:

> The word nation comes from the Latin and when first coined, clearly conveyed the idea of common blood ties. It was derived from the past participle of the verb *nasci*, meaning to be born. And hence the Latin noun, *nationem*, connoting breed or race.[23]

The form of the nation alluded to by Connor may be more in line with our understandings of the ethnic nation, as opposed to the other distinct configuration, the civic nation, often

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[18] States such as Lichtenstein, Luxembourg or Iceland might fit within this universe of cases. For an in-depth discussion about the fundamental differences between nations and states, see Walker Connor, "A Nation Is a Nation, Is a State, Is an Ethnic Group Is a…," *Ethnic and racial studies* 1, no. 4 (1978).
[19] Ernest Renan, "What Is a Nation?(1882)," in *Nationalism in Europe* (Routledge, 2002).
[20] Benedict Anderson, *Imagined Communities: Reflections on the Origin and Spread of Nationalism* (Verso books, 2006).
[21] Connor, "A Nation Is a Nation, Is a State, Is an Ethnic Group Is a…."
[22] Anderson, *Imagined Communities: Reflections on the Origin and Spread of Nationalism*.
[23] Connor, "A Nation Is a Nation, Is a State, Is an Ethnic Group Is a…."

referred to as a German versus French conceptualisation of the nation respectively.[24] Although some challenge this dichotomous distinction,[25] the ethnic formulation of the nation can be defined as a community that maintains collective ethnic or cultural identity, with language, religion, customs and cultural traditions constituting some of the shared characteristics. In other words, belonging to the same ethnicity is sufficient for membership in nations where ethnicity is the most salient aspect. The ethnic nation differs from a civic nation, which defines belonging not in terms of ethnicity or shared commonalities with regards to culture but in sharing a commitment to a set of (civic) political values or belonging to a shared political institution are the most prominent features. Various conceptualisations of the nation can be employed, politically and within political rhetoric, to serve an objective.[26] These characteristics, like most attributes for most concepts in the social sciences, are contested. For instance, some argue that a community must possess a territory, on which they reside, to be considered a nation.[27] Therefore, it can be challenging to determine when a community becomes more than just a group of people to become a nation.[28] Perhaps, therefore, it is best to examine the differences between a nation and an ethnic group. While, many of the definitional attributes of nationality and ethnicity overlap, the vital difference is that ethnicity is an association to a group which is not necessarily political, whereas nationality implies actual or potential politicised association.[29] As with the state and the nation, the nation and ethnicity are two terms that are often used interchangeably. Scholars are

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[24] Anthony Smith, "Civic and Ethnic Nationalism," *Nations and nationalism: A reader* (2005).
[25] See, Rogers Brubaker, "The Manichean Myth: Rethinking the Distinction between 'Civic'and 'Ethnic'nationalism," *Nation and national identity: The European experience in perspective* (1999).; Stephen Shulman, "Challenging the Civic/Ethnic and West/East Dichotomies in the Study of Nationalism," *Comparative political studies* 35, no. 5 (2002).
[26] Joseph Stalin published a book dealing with nationalism which could be perceived as an attempt to reduce the de-stabilising effect of nationalism on the Soviet Union: Joseph Stalin, "Marxism and the National Question," (1954).
[27] The Kurdish people are often considered an example of a nation without a territory.
[28] Walker Connor, "When Is a Nation?," *Ethnic and Racial studies* 13, no. 1 (1990).
[29]Liah Greenfeld, *Nationalism: Five Roads to Modernity* (Harvard University Press, 1992); Craig Calhoun, "Nationalism and Ethnicity," *Annual review of sociology* 19, no. 1 (1993).; David Miller, *On Nationality* (Clarendon Press, 1995).

perhaps guilty of knowing when they see ethnicity but are incapable or reluctant to define it. Ethnicity, often blamed for some of the world's most problematic conflicts, is a concept that is rarely defined and is assumed to be self-evident within International Relations scholarship.[30] Some problematically trace and assume the 'nation' and 'ethne' (an ethnic group) to be one of the same.

Although defining the concept is difficult, it is possible to identify the sources of ethnicity, with variation between examples. For instance, it is accepted that ethnic groups are membership communities with some form of common ancestry, history, homeland language, symbolism, and rituals. However, these are not always present within all ethnic groupings, leading to a varied conceptualisation of the terminology.[31] The lack of consensus on the definition of the term is not only a problem for scholars of nationalism and ethnic groups but also the practitioners of International Relations, as rhetoric and policies aimed at ethnic kin prominently shape interstate relations, while the membership requirements are in flux; these terms are of course continually socially constructed.[32] Because of this conceptual and terminological vagueness, it is, therefore, possible for politicians to utilise these fluctuations when there is a perceived benefit to do so, through rhetoric and legislation manipulations, by, for instance, adding or removing membership requirements such as language or residence on a particular territory.[33] To add to the confusion surrounding these interrelated concepts, the use of the terms are often interchangeable, as political objectives necessitate the conflation of ethnicity with nationality or vice versa. Both the terms nation and ethnicity are social constructs with ambiguous meanings and can be manipulated for political gains by a ruling elite, as with many concepts dealing with 'othering' or inclusionary/exclusionary groupings.

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[30] Jill Krause and Neil Renwick, *Identities in International Relations* (Springer, 2016).
[31] John Hutchinson, "Ethnicity and Modern Nations," *Ethnic and Racial Studies* 23, no. 4 (2000).
[32] Adamantia Pollis, "The Social Construction of Ethnicity and Nationality: The Case of Cyprus," *Nationalism and Ethnic Politics* 2, no. 1 (1996).
[33] Anthony Oberschall, "The Manipulation of Ethnicity: From Ethnic Cooperation to Violence and War in Yugoslavia," *Ethnic and racial studies* 23, no. 6 (2000).

Extraterritorial naturalisations essentially are a state conferral to the individual of the most formalised and institutionalised form of political membership, citizenship. Although there is a thorough extant debate dealing with what citizenship is, the origins of the term are less contested. The concept of citizenship was developed in Ancient Greece and expounded by the writings of Aristotle, and the mechanisms and aspects of this ancient form still underpin our contemporary understandings of the term. The Athenian citizenship described by Aristotle was a political, republican form, enjoyed by a minority class of individuals who were 'rule and are ruled by turns', meaning each citizen was required to perform political duties needed in the running of the city. These duties were not insignificant and involved participating in the city's assembly as well as jury service but resulted in effective popular control of the government. Many advocates of a contemporary republican form of citizenship praise the highly democratic form of Athenian citizenship, which Aristotle argued, rested on citizens knowing each other, sharing similar values and having common interests.[34] Although political equality among citizens was a facet of Athenian citizenship, only a privileged male minority were eligible, thus resulting in the political exclusion of the rest of the population. Contemporary advocates of liberal formulations of citizenship decry Athenian citizenship as being simultaneously exclusionary and 'despotic', as well as being oppressive to the individual's potential for disagreement with the state. Bellamy argues that citizenship in ancient Greece was 'doubly oppressive. On the one hand, it rested on the oppression of slaves, women, and other non-citizens. On the other hand, it was oppressive of citizens in demanding they sacrifice their private interests to service of the state.'[35]

Citizenship in the Roman imperial Empire was, in contrast to Athenian citizenship, primarily a legal rather than political status. As the Empire expanded, the Roman authorities allowed the populations of their conquered territories to retain their existing forms of

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[34] Richard Bellamy, "The Theories and Practices of Citizenship," *Citizenship: Critical Concepts* 4 (2013): 588.
[35] Ibid., 589.

government while conferring citizenship to (as with ancient Greece) a privileged minority. The Roman form of citizenship had no underlying political duties required of the individual, meaning that not all Roman citizens could vote in the Roman assemblies or hold political office.[36] However, the legal citizens of the Roman Empire were subjects to Roman law, meaning they had the right to sue and be sued, but also could hold the Roman Empire to account. Contemporary citizenship can be considered to be a hybrid of Athenian citizenship and Roman citizenship in that it:

> Tries to unite the political ideal of the equality of virtuous citizens, who rule and are ruled in turn to uphold the public interest, with the legal ideal of individuals as rights bearers, who pursue their private interests protected by the rule of law.[37]

There are two juxtaposed normative conceptualisations of citizenship: a liberal conceptualisation,[38] which predominately argues for a focus on rights of the citizen and sees citizenship as a vehicle to exercise individual liberty, and a communitarian,[39] or republican, form which sees citizenship as a commitment to the state and is inherently constructive in shaping and improving an individual and looks at the practice of citizenship from the perspective of the common good.[40] Both the republican and liberal conceptualisations of citizenship champion freedoms, but in a different manner – positive versus negative liberties, citizenship as an empowering force or citizenry as a protecting influence, respectively. In reality, our current notions of modern democratic citizenship have elements of both ancient Athenian citizenship and imperial Roman citizenship and republican and liberal elements.

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[36] Ibid.
[37] Ibid., 592.
[38] This liberal conceptualisation of citizenship stems from John Rawls, *A Theory of Justice* (Harvard university press, 2009).
[39] For a detailed review of the literature on communitarian perspectives of citizenship, see, Gerard Delanty, "Communitarianism and Citizenship," *Handbook of citizenship studies* (2002)., Ruth Lister, "What Is Citizenship?," in *Citizenship: Feminist Perspectives* (Springer, 2003).; Henry Tam, "What Is Communitarianism?," in *Communitarianism* (Springer, 1998).
[40] Tanja Brøndsted Sejersen, "“I Vow to Thee My Countries”–the Expansion of Dual Citizenship in the 21st Century," *International Migration Review* 42, no. 3 (2008)./

The concept of citizenship and its consequences on the political order have preoccupied political theorists and philosophers for centuries. In recent times, the work of the sociologist T. H. Marshall has been some of the most influential in shaping the narrative about the evolution of the term. Marshall argued that modern democratic citizenship evolved from a political to a civil, then to a social right resulting out of the effects of major wars and the entrenchment of the class divide, made possible by the three processes of state-building, the expansion of a commercial and industrial class, and the development of national consciousness.[41] Much of the discussion about citizenship can be considered normative, and accordingly, there is a vibrant debate about what ought to be included and excluded from the relationship between the state and individual. Mouffe argues that the term is itself normative because 'the way we define citizenship is intimately linked to the kind of society and political community we want.'[42] Although these debates are engaging and ongoing, from the perspective of the international political order, it perhaps matters less what are the constituent parts involved in the relationship between the citizen and the state, and more the function citizenship fulfils in consolidating a system based on sovereign states and their members. Brubaker recognises this in his definition of modern citizenship as 'an international filing system, a mechanism for allocating persons to states.'[43] Aleinikoff traces this principle to the 1932 Hague Convention on nationality, which stated: 'every person should have a nationality and should have one nationality only.'[44]

The concept of citizenship is one of the oldest political terms; Richard Bellamy in introducing a four-volume, fifteen part tome on the subject edited by Turner and Hamilton, states that although a plethora of conceptualisations of the term exists, fundamentally

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[41] Thomas H Marshall, "Class, Citizenship and Social Development," *New York* (1964).
[42] Chantal Mouffe, "Democratic Citizenship and the Political Community," *Dimensions of radical democracy: Pluralism, citizenship, community* (1992): 25.
[43] Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Harvard University Press, 2009), 31.
[44] Quoted in T Alexander Aleinikoff, "Between Principles and Politics: US Citizenship Policy," *From migrants to citizens: Membership in a changing world* (2000). Found in Isin and Turner, *Handbook of Citizenship Studies*.

citizenship is a 'political and legal artefact that creates a condition of civic equality among those who possess it concerning the prerogatives and responsibilities it bestows and requires.'[45] Alternatively, citizenship can be considered to be a concept linking an individual with the state and involves a package of 'duties, obligations, privileges, and rights'.[46] Under these overarching definitions exists a term with a vast array of conceptualisations dealing with the following questions: to whom citizenship applies, how citizenship is exercised, where citizenship is located and involves a discussion about the balancing of the two central aspects of the term: rights and duties.

Defining citizenship criteria is perhaps one of the most important aspects of a state's legislation. It remains a state prerogative to formulate citizenship criteria in any manner it deems appropriate. Although there are parallels between various citizenship regimes across the world, each state can package the bundle of rights and obligations differently. The rights of citizenship, for instance, vary considerably from state to state. For example, while both the UK and the US grant the right to a free trial, right to freedom of expression, religion, assembly, and speech, the US, within the Bill of Rights or the first ten amendments to the Constitution, includes the right to bear arms – a right not offered by the UK government to its citizens.

Moreover, for many states, but not every state, the primary duty is conscription, meaning that in order to maintain or obtain citizenship it is necessary to serve a predetermined period within the state's military or civil services. Some rights of a state could also be considered as a duty; for instance, the right to universal suffrage is a right shared by all democratic states' citizenship regimes, yet in Australia, not only is it a right for all its citizens to be able to vote, but it is also mandatory, thus becoming a duty of the citizen. Law abidance is perhaps the fundamental universal duty across all states, but the details vary from state to

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[45] Richard Bellamy, "Citizenship: Historical Development Of," in *Citizenship: Critical Concepts*, ed. Bryan S Turner and Peter Hamilton (Taylor & Francis US, 1994).
[46] Charles Tilly, "A Primer on Citizenship," *Theory and Society* 26, no. 4 (1997): 599.

state. Voting rights remain a controversial central tenet of citizenship regimes. For example, in some states, having the right to vote is afforded only to resident citizens, while in others, residency is irrelevant.

There is a vast array of literature in citizenship studies, the majority of which tackles the subject from the perspective of inclusionary or exclusionary dynamics.[47] Tilly defines citizenship as a relationship between governmental agents and whole categories of persons identified uniquely by their connection with the government in question and is, in essence, a social construct built through series of transactions that draw an invisible line between those included and those excluded from the membership group.[48] For Tilly, citizenship is never entirely bounded is therefore adaptable and flexible. [49] Brubaker, another constructivist, would agree with Tilly's assessment as he is concerned with the interrelated concepts of citizenship, nations, and ethnicity, argues for greater conceptual clarity and recognition of the discursive forces that shape these concepts, as these are not 'things in the world, but perspectives on the world.'[50] Linklater, a critic of realism and proponent of non-nationalist conceptualisations of citizenship, would disagree with Tilly's nationalist perspective on citizenship, arguing that citizenship rights and the membership group itself have co-evolved to be less state-centric, given the impact of globalization.[51] Linklater argues against the need for a form of communitarian citizenship of bounded communities as outlined by Walzer, who argues that citizens have a clear sense of the boundaries of political membership, hinging on the sentiment of a shared, unique history.[52] Linklater proposes to do away with this system and that 'the reform of the international system should begin with the transformation of the idea of the state as a moral community and with the alteration of past assumptions about the

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[47] Engin F Isin, Peter Nyers, and Bryan S Turner, *Citizenship between Past and Future* (Routledge, 2013).
[48] Charles Tilly, *Identities, Boundaries and Social Ties* (Routledge, 2015), 192-3.
[49] Ibid.
[50] Rogers Brubaker, *Ethnicity without Groups* (Harvard University Press, 2004).
[51] Andrew Linklater, *Critical Theory and World Politics: Citizenship, Sovereignty and Humanity* (Routledge, 2007).
[52] Martha Craven Nussbaum and Joshua Cohen, *For Love of Country?*, vol. 14 (Beacon Press, 2002).

rights and duties of bounded political communities.[53] For Linklater, citizenship ought to be less exclusionary and that in its current form, there is a tension between humanity and citizenship, as it has been 'the principal forms of exclusion in social and political life.'[54] However, Linklater's normative theory on citizenship predicts that citizenship would become less about what citizens do and more about the formal status, or what citizens 'are', as not come true;[55] states and their citizens matter as much as ever.

While it is accepted here that some forms of citizenship are socially constructed from the bottom-up or the top-down gradually, the legal status of citizenship is not and has genuine implications for the international political system. This thesis demonstrates that extraterritorial naturalisation and, therefore, citizenship can be used for instrumental purposes as a means of gaining power; this, therefore, is a critical perspective on the dominant constructivist explanations of citizenship and therefore challenges the view that citizenship in the context of extraterritorial naturalisation relates solely to kinship, history, legacy, or other invisible factors that manipulate the boundaries of state membership. The near-instantaneous expansion of citizenship is evidence that even if citizenship can be socially constructed from inclusionary and exclusionary forces, it is not always, as some states export citizenship for power-political purposes when it suits them to do so.

Around the Millennium, there was a discussion about the future of the state in light of the consequences of an increasingly globalised world. This debate centred on how governments interact with their citizenry and other governments, and how this global 'filing system'[56] might be disrupted. Some were calling for more attention to the potential for a de-territorialised state and citizenship,[57] with normative arguments for a cosmopolitan form of

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[53] Andrew Linklater, *Men and Citizens in the Theory of International Relations* (Springer, 1982).
[54] *Critical Theory and World Politics: Citizenship, Sovereignty and Humanity*, 67.
[55] Else Kveinen, "Citizenship in a Post-Westphalian Community: Beyond External Exclusion?," *Citizenship Studies* 6, no. 1 (2002).
[56] Brubaker, *Citizenship and Nationhood in France and Germany*, 31.
[57] See for example Linda Basch, Nina Glick-Schiller, and Cristina Szanton-Blanc, "Transnational Projects: A New Perspective," *Nations Unbound: Transnational Projects, Post-Colonial Predicaments, and De-Territorialized Nation-States* (1994).; Stephen Castles and Alastair Davidson, *Citizenship and Migration:*

citizenship being one consequence of this.[58] However, territory is still fundamental, albeit in an altered manner, to the state and therefore to the citizen; it appears that those predicting a demise of the sovereign territorial state underestimated the resistance to relinquishing the monopoly of the 'legitimate means of movement' within a territorial unit.[59] Nevertheless, the increase in global mobility and migration[60] has meant that citizenship has indeed changed; more people reside in territories that are not part of the state of their citizenship.[61] Citizenship, as a concept, has evolved as transnationalism is broadened and deepened. Transnationals pose challenges to the states of which they are members; for some, transnationalism threatens the international political system as it currently stands. Castles and Davidson predicted that:

> Transnationalism will inevitably lead to a rapid rise in multiple citizenships – creating the phenomenon most feared by nationalists – the potentially divided loyalties of people with an instrumental rather than emotional attitude toward state membership. The growth of transnationalism may, in the long run, lead to a rethinking of the very contents of citizenship.[62]

Castle and Davidson were right in forecasting the increase in multiple citizenships. States have become increasingly tolerant of dual citizenship as a political phenomenon, and the number of dual citizens has increased accordingly.[63] The literature dealing with the changing dynamic in the relationship between the state and the dual citizen has thus far mainly focussed on the individual's perspective, meaning, how dual citizens experience the relationship between the state(s) and their group(s),[64] or with the structural conditions that have enabled

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Globalization and the Politics of Belonging (Psychology Press, 2000); Stuart Elden, "Missing the Point: Globalization, Deterritorialization and the Space of the World," *Transactions of the Institute of British Geographers* 30, no. 1 (2005).

[58] Andrew Linklater, "Cosmopolitan Citizenship," *Citizenship studies* 2, no. 1 (1998).

[59] John Torpey, *The Invention of the Passport: Surveillance, Citizenship and the State*, Cambridge Studies in Law and Society (Cambridge: Cambridge University Press, 1999).

[60] Mathias Czaika and Hein De Haas, "The Globalization of Migration: Has the World Become More Migratory?," *International Migration Review* 48, no. 2 (2014).

[61] Khalid Koser and Paul Wilkinson, *International Migration: A Very Short Introduction* (Oxford University Press, 2007), 23.

[62] Castles and Davidson, *Citizenship and Migration: Globalization and the Politics of Belonging*.

[63] Sejersen, "'I Vow to Thee My Countries'–the Expansion of Dual Citizenship in the 21st Century."

[64] Thomas Faist, "Dual Citizenship as Overlapping Membership," *The Willy Brandt Series of Working Papers* (2001).

dual citizenship.[65] Less literature on dual citizenship aims to address how states experience dual citizenship. However, Vertovec points to the disruptive nature of dual citizenship from the perspective of the state.

> The modern nation-state container model has normally functioned with an implicit zero-sum understanding of social/cultural/political belonging: either one 'is in, or out'; this might be truer for some states, particularly if the obligations for their citizens require membership exclusivity, i.e. conscription into the military services.[66]

One lens through which to view the changes brought about by increased global mobility and movement is how states define and address external populations. Most states have developed policies to engage with 'their' people abroad, leading to rich literature from migration scholars dealing with this.[67] Although intensifying in recent years, diaspora engagement policies are not new and vary hugely in form and context. Much of the literature deals with how 'sending states' engage with populations who have emigrated.[68] Other literature discusses the implications of more complex relationships between the 'home' state and the diaspora communities abroad, which do not always involve population movements, such as the Tamils,[69] the Punjabi Sikhs,[70] or the Armenians.[71] Thorough literature also exists on ethnoreligious diaspora engagement policies regarding the impact of Jewish communities' political relationship with Israel.[72] A smaller set of literature deals with diaspora politics from

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[65] Thomas Faist and Jürgen Gerdes, "Dual Citizenship in an Age of Mobility," *Delivering Citizenship: The Transatlantic Council on Migration* (2008).
Sejersen, "'I Vow to Thee My Countries"–the Expansion of Dual Citizenship in the 21st Century."
[66] Steven Vertovec, "Transnational Challenges to the "New" Multiculturalism," (2001).
[67] For a typology of diaspora engagement policies see Alan Gamlen, "Diaspora Engagement Policies: What Are They, and What Kinds of States Use Them? In Working Paper 06-32," (University of Oxford, 2006).; Francesco Ragazzi, "A Comparative Analysis of Diaspora Policies," *Political Geography* 41 (2014).
[68] Elaine Lynn-Ee Ho, "'Claiming'the Diaspora: Elite Mobility, Sending State Strategies and the Spatialities of Citizenship," *Progress in Human Geography* 35, no. 6 (2011).; Alan Gamlen, "The Emigration State and the Modern Geopolitical Imagination," *Political Geography* 27, no. 8 (2008).; Délano and Gamlen, "Comparing and Theorizing State–Diaspora Relations."
[69] Fred W Clothey, *Ritualizing on the Boundaries: Continuity and Innovation in the Tamil Diaspora* (University of South Carolina Press, 2006).;
[70] Michael Angelo, *The Sikh Diaspora: Tradition and Change in an Immigrant Community* (Taylor & Francis, 1997).
[71] Susan P Pattie, "Longing and Belonging: Issues of Homeland in Armenian Diaspora," *PoLAR: Political and Legal Anthropology Review* 22, no. 2 (1999).
[72] For example, see William Safran, "Diasporas in Modern Societies: Myths of Homeland and Return," *Diaspora: A journal of transnational studies* 1, no. 1 (1991).; "The Jewish Diaspora in a Comparative and Theoretical Perspective," *Israel studies* 10, no. 1 (2005).

an International Relations perspective.[73] However, while most of this literature deals with cases where there is a clearly defined, tangible link between the 'kin' state and the diaspora, fewer studies reveal the relationship's impact where this connection is less clear. A notable exception is a literature addressing the relationship between the 'kin' and 'home' state populations.[74] The 'kin' state is the state connected to the diaspora in the 'home' state. Although the cases examined within this thesis are often considered examples of 'kin-home' state relations, and this thesis will engage with this literature, this labelling is not always clear and is contentious;[75] partly due to its confusing nature. For example, it is not clear that a second, third, or fourth-generation immigrant should be categorised as residing in a 'home state' while having attachments to a 'homeland, given that for many years, they and their ancestors are at home on the territory on which they reside.'[76] Likewise, the term 'kin-state' makes salient ethnic affiliations which might be less critical in the relationship than the category label suggests.

Extraterritorial naturalisations might be considered an intensive form of diaspora engagement policy with a tangible commitment from the naturalising state. However, extraterritorial citizenship regimes are not limited to occurrences of naturalisations of select populations. Although not a form of naturalisation, Estonia has launched an E-residency programme for non-Estonian citizens and residents in recent years. Through this programme, people can receive the tax and business benefits associated with Estonian residence by paying

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[73] Yossi Shain and Aharon Barth, "Diasporas and International Relations Theory," *International organization* 57, no. 3 (2003).
[74] Alexander C Diener, "Kazakhstan's Kin State Diaspora: Settlement Planning and the Oralman Dilemma," *Europe-Asia Studies* 57, no. 2 (2005).; Myra A Waterbury, "Internal Exclusion, External Inclusion: Diaspora Politics and Party-Building Strategies in Post-Communist Hungary," *East European Politics and Societies* 20, no. 3 (2006).; *Between State and Nation: Diaspora Politics and Kin-State Nationalism in Hungary* (Springer, 2010).; "Bridging the Divide: Towards a Comparative Framework for Understanding Kin State and Migrant-Sending State Diaspora Politics," *Diaspora and Transnationalism: Concepts, Theories and Methods* (2010).
[75] The implicit questions arising out of this debate are: at which point do diasporas become so? What characteristics must be present for a population to be considered a diaspora of another state?
[76] Khachig Tölölyan, "The Contemporary Discourse of Diaspora Studies," *Comparative Studies of South Asia, Africa and the Middle East* 27, no. 3 (2007).

100 euros.[77] Similarly, other fee-for-benefits schemes for non-residents or citizens exist in a more significant form. For example, Malta offers their citizenship, and therefore an EU passport, at the cost of 1.15 million euros. Cyprus offers a similar system, selling their citizenship for 2 million euros.[78] Financial transactions for citizenship do not always involve an individual purchasing citizenship; in bulk, the United Arab Emirates purchased passports from Comoros to distribute them to their own *Bidoon* or nomadic populations.[79]

The limited work conducted on extraterritorial naturalisations has thus been confined to individual area-studies single case studies,[80] mentioned very briefly as part of a review of a foreign policy package,[81] or solely focused on the legal aspects of the policies.[82] This systematic study will address a real empirical gap, with from the perspective of International Relations scholarship. Unequivocally, these components are relevant to International Relations scholars as they address questions relating to identity, power, strategy, nationalism, and foreign policy analysis.

Regarding the nation and the 'ideology of the nation'[83] or nationalism, this thesis will contribute to the discussion about how instrumental nationalism manifests itself in international politics and how the rhetoric on nationalistic politics changes depending on domestic and international contexts.[84] It will also speak to those attempting to unpack contemporary Russian nationalism, which demonstrates a complex blend of civic, ethnic and

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[77] Taavi Kotka, Carlos Ivan Vargas Alvarez del Castillo, and Kaspar Korjus, "Estonian E-Residency: Redefining the Nation-State in the Digital Era," *University of Oxford, Working Paper Series* 3 (2015).
[78] Ayelet Shachar, "Citizenship for Sale?," in *The Oxford Handbook of Citizenship* (2017).
[79] Atossa Araxia Abrahamian, *The Cosmopolites: The Coming of the Global Citizen* (Columbia Global Reports, 2015).
[80] Waterbury, *Between State and Nation: Diaspora Politics and Kin-State Nationalism in Hungary*.; ibid.
[81] For instance, see Agnia Grigas, *Beyond Crimea: The New Russian Empire* (Yale University Press, 2016).
[82] For example, see Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."
[83] Anthony H Birch, *Nationalism and National Integration* (Routledge, 2012), 7.
[84] See, for example, Andrei P Tsygankov, *Russia's Foreign Policy: Change and Continuity in National Identity* (Rowman & Littlefield, 2016); Friedrich V Kratochwil, *Rules, Norms, and Decisions: On the Conditions of Practical and Legal Reasoning in International Relations and Domestic Affairs*, vol. 2 (Cambridge University Press, 1991).; Alexander Wendt, "Collective Identity Formation and the International State," *American Political Science Review* 88, no. 2 (1994).

political nationalism depending on the spatial and temporal milieu.[85] Contemporary Hungarian nationalism is *prima facie* ethnically motivated. However, this thesis will delve into its extant evolution regarding extraterritorial naturalisation policies and show its mutable character is conditional on domestic politics. Therefore, it is debatable whether Hungary has an ethnonationalist project,[86] even so, it is and will be, poly-ethnic to some degree like the majority of the world's states.

The topic is also relevant for another two reasons: first, to address the theoretical and empirical gap in the academic literature addressing collective extraterritorial naturalisations. Second, as the topic takes a perspective which interprets the use of citizenship and naturalisation as an emergent state strategy and foreign policy instrument, there is policy relevance that can enable transference from academia to the political realm. In practice, to the international system, individual extraterritorial naturalisations do not matter and primarily go unnoticed. However, when used strategically, on a collective level, consequences for the states involved, and the international political system more generally increase dramatically. For scholars of International Relations, the phenomenon of extraterritorial naturalisations engages two dominant approaches to the field, constructivism and realism; on the one hand, citizenship, nation-building, and national and individual identities are issues entirely within the competences of constructivists. However, this political phenomenon will intrigue realists too, as if the argument that states conduct extraterritorial naturalisations strategically is accepted, then the practice concerns power dynamics and contestations. However, the argument is not a question of identity versus power; instead, it is an example of identity and power. States manipulate identity politics to create and contest power.

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[85] John B Dunlop, *The Faces of Contemporary Russian Nationalism* (Princeton University Press, 2014).
[86] For a discussion on ethnonationalism, see Walker Connor, *Ethnonationalism* (Wiley Online Library, 1994).

Case selection rationale

The universe of cases, whereby some form of naturalisation occurs is vast. Most states allow for the naturalisation of individuals, but there is variance in the underlying principles that provide the legal framework for citizenship legislation. Three overarching themes can classify these principles; one based on residence, the principle of *ius domicile;* one connected to birthplace or the principle of *ius soli*; and one concerning blood relations known as the principle of *ius sanguine.* In isolation or as a combination, these principles are present in the majority of the world's states' citizenship laws. It is possible to narrow the universe of potentially relevant cases when considering the volume of the naturalisations, both potential and realised. Hungary and Russia instigate the process by choosing populations to naturalise, whereas the typical naturalisation process is for individuals to initiate the process by approaching the state apparatus to become naturalised.[87] When the scope of these activities moves from the individual to the collective, the naturalisation practices bring to the fore questions relating to the interests of the naturalising state, the preservation of the statehood of the 'home state', and both the territorial sovereignty of the naturalising and 'home state'. Although international law is unconsolidated, principles that guide such practices involve good neighbourliness, the repartition of jurisdiction, and establishing a connection between the naturalised state and the naturalised.[88] The number of potential instances and cases of state naturalisations of individuals is significant and although attractive to legal scholars of citizenship regimes, is not especially relevant to International Relations. On the other hand, collective naturalisations have broad and significant implications for international politics, given the impact on inter-state relations.

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[87] Turack, *The Passport in International Law*.
[88] José-María Arraiza, "Good Neighbourliness as a Limit to Extraterritorial Citizenship: The Case of Hungary and Slovakia," in *Good Neighbourliness in the European Legal Context* (Brill, 2015).

This project will involve a study of provocative collective extraterritorial naturalisations. It is possible to narrow the scope of relevant cases by removing instances where there appears to be no aggravation involved with the practice, or the practice is conducted with the sole objective of preserving statehood through populations. For example, the Italian state conducted large-scale extraterritorial naturalisations of those with Italian ancestry in the 1990s, principally within Latin America. Likewise, Ireland has a policy of naturalising descendants of people born in Ireland, without requiring a formal residence period in Ireland. Although these cases are thought-provoking, the lack of resistance from the respective 'home states' is indicative of the benign nature of these practices. Therefore, the Irish and Italian cases of extraterritorial naturalisations are excluded from the study's focus, as these policies aim at naturalisations of Ireland born descendants, emigrants from Italy and Ireland respectively. These instances are examples of extraterritorial naturalisation policies that are also indiscriminate regarding territory on which these target groupings reside. The difference is due to the intent and the impact of these practices on their political dynamics in the states where the naturalising state enacts these practices. There are two observable forms of extraterritorial naturalisations: a manifestation based on affinity, and a second contiguous form. The Italian and Irish cases can be considered as a form of extraterritorial naturalisation based on affinity and are non-contiguous policies, meaning that borders and geography are irrelevant to the practice.

There are a few more cases of extraterritorial naturalisations conducted at a collective level which are excluded from the focus of this thesis given the relatively small number of citizens involved and therefore an insignificant impact on inter-state relations; for instance, the Polish and Romanian governments separately pursue naturalisation practices in Ukraine, but not in significant numbers.[89]

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[89] 112 Ukraine, "Mass Issuance of Hungarian, Romanian, Polish, Russian Passports to Ukraine's Citizens Investigated," 112 Ukraine,, https://112.international/ukraine-top-news/mass-issuance-of-hungarian-romanian-polish-and-russian-passports-to-ukraines-citizens-investigated-44134.html.

The narrowing of the potential cases through which to study the mechanisms, implications and intent of extraterritorial naturalisation practices culminates with two contemporary cases[90]: Russia and Hungary.[91] The extraterritorial naturalisation practices of Russia and Hungary, as opposed to the Italian and Irish instances, are conducted in territories contiguous to their own, meaning that the borders are highly relevant to the practice. These two states also naturalise populations in a volume exceeding that of Poland and Romania.

Geography here, as in much of politics, matters. States that share borders with others are affected to a higher degree by their activities and politics, than those elsewhere; as Starr and Most argue, along with others who take the 'territorial perspective'[92] in International Relations, geographical proximity increases the opportunity for interaction, whether this is positive or not.[93]

The Russian form of extraterritorial naturalisations is sometimes referred to as passportization, or 'system of passport distribution to a population.'[94] The term directly translates from *pasportizatsiya* and originates from the period of the Soviet Union, as the authorities, issued *en masse,* Soviet internal passports to their subjects.

Hungary has explicitly attempted to expand its citizen body across their territorial borders through national certification distribution to ethnic populations. Russia and Hungary

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[90] There is a historical instance of extraterritorial naturalisations. The German state naturalised the majority German-speaking population of Sudetenland based on *ius sanguinis* before the naturalisation of the territory in 1938. See, Claude Cahn, "Minorities, Citizenship and Statelessness in Europe," *European journal of migration and law* 14, no. 3 (2012).; Graham Smith and Andrew Wilson, "Rethinking Russia's Post-Soviet Diaspora: The Potential for Political Mobilisation in Eastern Ukraine and North-East Estonia," *Europe-Asia Studies* 49, no. 5 (1997).

[91] Note that in 2010 Armenian citizenship legislation was modified, waiving the previously imperative language and three years of residency for citizenship. However, there has been limited uptake in Armenian naturalisations, given the requirement for newly naturalised citizens to conscript in the military for 24 months or conduct civil service for 48 months. See Azernews, "15,000 People Renounce Armenian Citizenship in Five Years," https://www.azernews.az/aggression/125438.html. Georgian extraterritorial naturalisation of ethnic Georgians in Russia, for instance, is hindered by a 5 -year residency requirement for naturalisation. Likewise, although Chinese extraterritorial naturalisation is theoretically possible, the naturalisation process is contingent on the individual becoming 'settled' in China.

[92] Harvey Starr, "Territory, Proximity, and Spatiality: The Geography of International Conflict," *International Studies Review* 7, no. 3 (2005).

[93] Harvey Starr and Benjamin A Most, "The Substance and Study of Borders in International Relations Research," *International Studies Quarterly* 20, no. 4 (1976).

[94] Sam Wrighton, "Authoritarian Regime Stabilization through Legitimation, Popular Co-Optation, and Exclusion: Russian Pasportizatsiya Strategies in Crimea," *Globalizations* (2017).

serve as the naturalising states' case studies, but there are several more (sub) cases – the states where they enact their naturalisation policies. For Russia, these are Georgia, Moldova, Ukraine, and the Baltic states. For Hungary, the relevant 'home states' are states with territories, and therefore populations, which were part of the former Kingdom of Hungary. This research will include both the naturalising states and 'home states' as cases.

This research involves case selection on the dependent variable. It is not a project to create generalisable theories or an attempt to deduce the effects of causes beyond those examined in this project. As little has been theorised about the topic, this problem-orientated study based on inductive reasoning begins with a description of the similar cases given 'in cases where description precedes causation, i.e., in those circumstances where knowledge of a topic is minimal, description must proceed independently of causal propositions.'[95] Later, the thesis will move towards an assessment of the causal mechanisms involved in the decision-making process for extraterritorial naturalisation policies, thus selecting cases on the dependent variable is defensible. Parsimony is not an objective here. Instead, the focus is on the causal influences for the bounded set of cases detailed above. It is not an attempt to build theory or to test a theory for a broader set of cases. In other words, the thesis is an effort to unpick two states power political practices in the context of external populations and is, in essence, a foreign policy analysis. The extent to which these theoretical underpinnings of these cases is representative of a larger universe of cases is not an especially important aspect of the argument presented in this thesis; as Gerring argues 'a large class of topics in political science is intrinsically important, regardless of any causal effects they might possess…our interest is not contingent merely upon the roles they might play in causal propositions.'[96] In other words, these cases are important because significant to the field regardless of whether or not the same practice conducted by other states would have the same effect.

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[95] John Gerring, "Mere Description," *British Journal of Political Science* (2012): 733.
[96] Ibid., 733-4.

The introduction of negative sub-cases within the three cases might strengthen the causal claims made in this thesis. For instance, the extraterritorial naturalisations conducted by the Russian Federation have not been uniform in application. Although seemingly intended to be a national policy to privilege either ethnic or cultural Russians, events in South Ossetia, Abkhazia, Crimea, Transnistria, and most recently Donbas, have shown that the Russian projection of nationality is complicated, based on a civic, not ethnic form of nationalism, as well as political nationalism.[97] This political citizenship makes salient differing aspects or requirements depending on circumstance and is subject to flux based on the state's domestic or international agendas. Likewise, although Russian extraterritorial naturalisation policies appear to be increasing in volume and prominence in the Baltic states and Ukraine, states such as Kyrgyzstan or Kazakhstan appear to be of less importance to the Russian Federation despite large numbers of ethnic and cultural Russians within these states.[98] These discrepancies hint at an underlying intent and strategy; supposedly uniform legislation is not implemented equally across all relevant locations, implying that states make strategic decisions regarding which regions to conduct extraterritorial naturalisations to gain the most benefit to the naturalising state. In other words, the decision to implement policy in one location and not another is strategic. The conscious manipulation of inclusion for political purposes is idiosyncratic to these two states. The lack of extraterritorial naturalisation practices adopted by the countries within which Russia conducts extraterritorial naturalisations also alludes to the possibility of strategy or realpolitik being the salient motivating factors.[99]

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[97] Marlène Laruelle, *In the Name of the Nation: Nationalism and Politics in Contemporary Russia* (Springer, 2009).; Petr Panov, "Nation-Building in Post-Soviet Russia: What Kind of Nationalism Is Produced by the Kremlin?," *Journal of Eurasian Studies* 1, no. 2 (2010).

[98] See Figure 4

[99] According to Georgian citizenship legislation, external extraterritorial naturalisation is impermissible given that a minimum period of residency in Georgia is a requirement to begin the naturalisation process. However, there are anecdotal reports of Georgian extraterritorial naturalisation practices conducted in Russia. These reports will be examined later in the thesis during the detailed case study analysis. Dual citizenship within Georgia is mostly prohibited; however, it is possible to retain Georgian citizenship if, before acquiring the citizenship of another country, the citizen procures an official consent from Georgian authorities.

Similarly, within Hungary, not all extraterritorial naturalisations are conducted equally and evenly, predominately because of structural factors, such as the EU membership status of the 'home state' and the perceived utility for both the naturalising state and the recently naturalised. The 'sub-cases' within the case studies where extraterritorial naturalisations are absent are as significant as those where these policies are present for inferring intent. The Hungarian sub-cases are defined explicitly within Hungarian Act 2001 – LXII on Hungarians Living in Neighbouring Countries, as the 'Republic of Croatia, the Federal Republic of Yugoslavia, Romania, the Republic of Slovenia, the Slovak Republic or Ukraine.'[100]

In the Russian case, access is a consideration in choosing case studies in which to conduct the empirical data gathering process. Given the small possibility that interviews with officials in Russia will be possible or fruitful, it is necessary to infer Russian State intent from the impact of extraterritorial naturalisation policies for the 'home state'. Accordingly, I conducted interviews with Georgian, Estonian, Latvian, Lithuanian, Ukrainian, Slovakian, Serbian, Romanian, and Hungarian officials.[101] Of course, these sources are likely to be biased, creating a data asymmetry. However, conducting official interviews in Russia was not possible given the constraints of the circumstances. This asymmetry will partially be addressed through the web scrape and analysis of Russian official documentation and discourse.

The identifier 'Russian' is complex but vital to understanding Russian foreign and domestic policy. Of the few instances where the nation and the state neatly fit within one another, Russia is not one of them.[102] There are four distinct groups of people who might refer to themselves as 'Russian' with some individuals belonging to multiple groups. The first group, *Russkiy,* refers to members of the Russian ethnicity. The *russkiye* [plural of *Russkiy*]

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[100] Article 1 of Hungarian Act 2001 – LXII on Hungarians Living in Neighbouring Countries.
[101] I have chosen not to extensively focus on Croatia or Slovenia in this thesis given the relatively few Hungarians living in these states.
[102] Graham Smith, *Nation-Building in the Post-Soviet Borderlands: The Politics of National Identities* (Cambridge University Press, 1998).

form part of the East Slavic ethnic group and make up approximately 80 per cent of the Russian Federation population, with another 8 million who reside beyond the Russian Federation's territorial state borders, as shown by the map in Figure 4 below. Of the groups mentioned here and following, the *russkiye* are the smallest group.

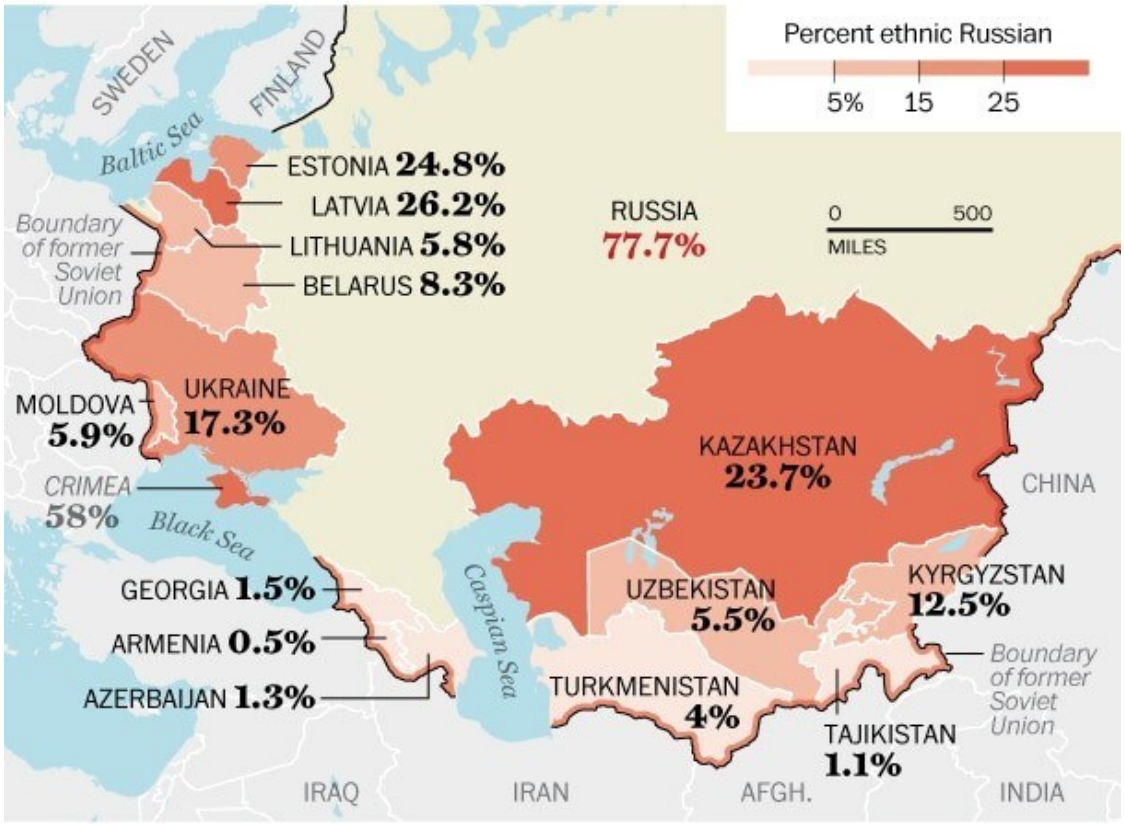


Figure 4. Map showing percentages of ethnic Russian, *Russkiy*, populations in post-Soviet States[103]

The second group, *Rossiyane,* refers to citizens of the Russian Federation but are not necessarily *russkiye.* There are *russkiye* who are not *Rossiyane* and vice versa. This group of people are more numerous than *russkiye.* The third group who might refer to themselves as Russophones, or *russkojazýčnyj,* might of course also be *Russkiy, Rossiyane,* both or neither. The largest group, the Russian Compatriots, is a vague grouping of people who associate with the Russian Federation. The Russian Federal Agency for the Affairs of the Commonwealth of

[103] Data Source, CIA Factbook. Image source, The Washington Post, "Ethnic Russians in Former Soviet Republics," https://www.washingtonpost.com/world/ethnic-russians-in-the-former-soviet-republics/2014/05/17/25298b4e-de19-11e3-8009-71de85b9c527_graphic.html.

Independent States, Compatriots Living Abroad, and International Humanitarian Cooperation, states that there are 'about 30 million Russian Compatriots who have found themselves outside of Russia for one reason or another live in the world.'[104] They consider Russian Compatriots to be those that share Russian' culture, values, language … and ties and relations to the homeland.'[105]

The peoples that form all four of these groupings are said to form part of the *Russkiy Mir,* or Russian world. Although usage of the term can be traced back to Russian Grand Prince of Kyiv Iziaslav Iaroslavich in the 11th Century,[106] its usage was revived and consolidated by Vladimir Putin culminating in the founding of the Russkiy Mir Foundation in 2007. The Foundation is a government-sponsored organisation that, according to the Russkiy Mir Foundation's website, attempts to 'promote and preserve Russian language, culture, heritage and values,[107] and works in cooperation with the Russian Orthodox Church.[108]

The terms Compatriot and *Russkiy Mir* are vague and politically charged concepts. As will be discussed later, various groupings of 'Russians' have been made salient over other groups depending on the political objective. The overlapping categories of 'Russians' are sometimes in tension within one another. For example, while the Russkiy Mir Foundation aims to promote Russian values, with Christian Orthodoxy being a central component of this, the Foundation aims to be relevant for all Russian Compatriots, many of whom, in Central Asia for instance, are not part of the Russian Orthodox Church. This thesis argues later that political rhetoric about the Russian World is either deliberately vague or state officials manipulate the Russian World's contours to serve a particular political interest. Regarding the extraterritorial naturalisation policy of the Russian Federation, this means it is possible to be

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[104] Rossotrudnichestvo, "Support for Compatriots Abroad," https://rs.gov.ru/ru/activities/5.
[105] Ibid.
[106] Marlène Laruelle, "The Russian World," *Russia's Soft Power and Geopolitical Imagination. Center on Global Interests* (2015).
[107] Russkiy Mir Foundation, "About Russkiy Mir Foundation," https://russkiymir.ru/en/fund/index.php.
[108] Alicja Curanović, "Religion in Russia's Foreign Policy," *New Eastern Europe* 8, no. 3 (2013).

expansionist or increasingly inclusionary by referring to the Russian Compatriot or *Russkiy Mir* as a whole, or more exclusionary, by referring to either the *Rossiyane* or *russkiye* groups.

> So-called Russians, Russian speakers outside of Russia, are very diverse. Russia itself is not a nation-state. … Russia declared itself as a continuation of the Soviet Union, which means that anybody that was a subject of the Soviet Union is automatically a Compatriot for Russia. … I think it is fuzzy exactly for that reason.[109]

The Russian Compatriot status confers no rights in Russian municipal law and is not part of Russian legal practice concerning migrants present in Russia. However, Russia uses the term to frame foreign policy decisions by the Kremlin, particularly during escalation or expansion.

Methodology

The project will employ a qualitative, process-tracing methodology drawing on the following primary sources: 1) policy documents and legislation; 2) interviews with state officials, and politicians from Hungary and the states on which the naturalisations have been conducted; and 3) an analysis of official statements of policymakers from the naturalising states and other relevant stakeholders.

This research will draw upon, engage with, and contribute to bodies of literature within the overlapping fields of political geography, International Relations and mobility studies to provide a conceptualisation of what might be an emergent or idiosyncratic phenomenon, that is, furthermore, as yet under-researched. The analysis of this data helped formulate the following argument: Russia and Hungary conduct extraterritorial naturalisations for strategic purposes to fulfil their foreign policy objectives. In other words, states naturalise

[109] Personal interview with Kristina Kallas – a politician of the Estonian political party, Eesti 200, in Tallinn, Estonia on 4 May 2019. See Interview_ID_04_Kristina_Kallis at https://reshare.ukdataservice.ac.uk/854598/

external populations to generate power abroad by collecting bargaining chips or points through which to exert political leverage.

This research on population and foreign policy deals with top-down, state-orientated governance mechanisms: examining what policymakers think, the laws they develop and their efforts to compel civilians to obey the law, while also providing an analysis of what these policies mean in practice as official rhetoric and policy often mask intent. This research will examine state practices and procedures. It will examine the impact on members of affected populations as agents capable of producing a change in state practice, scrutinising the conduct, effects, and implications of state engagement in the extraterritorial governance of populations.

The project employed a qualitative research design approach. I sourced interviewees with state officials by sending requests to consulates, embassies and immigration departments. Sourcing those with internet access might build in biases into the research design. Therefore, I ensured participant sourcing as conducted using a multi-nodal participant recruitment process.

A crucial methodological, analytical tool for the project is process-tracing, which aims to 'identif[y] a causal chain that links independent and dependent variables'[110] by searching for 'theoretically predicted intermediate steps'.[111] Given that this methodology primarily seeks to determine whether our prior theoretical understandings about the causal mechanisms are valid, it is necessary to hypothesise about these mechanisms' form and substance. Process tracing relies on gathering large amounts of data from a wide range of sources, primarily through the examination of 'histories, archival documents, [and] interview transcripts.'[112] Gathering and interpreting data on state collective extraterritorial naturalisations will

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[110] Jeffrey T Checkel, "Process Tracing," in *Qualitative Methods in International Relations* (Palgrave Macmillan UK, 2008), 116.
[111] Ibid.
[112] Alexander L George and Andrew Bennett, *Case Studies and Theory Development in the Social Sciences* (MIT Press, 2005), 6.

contribute to an overarching process tracing methodology. Process tracing will also assist in developing the comparative aspect of the method, as 'even when two cases or before-after cases are not perfectly matched, process-tracing can strengthen the comparison by helping to assess whether differences other than those in the main variable of interest might account for the differences in outcomes.'[113] The causal mechanism examined in this thesis is the elite calculation of domestic or international interest.

I conducted fifty-two semi-structured elite interviews, and one citizen interview (for which I used a pseudonym when referencing), with those involved in these processes alongside document analysis, highlighting each of the distinct steps in the extraterritorial naturalisation process and will support the triangulation of the data collected. The interviews will aim to enact the 'knowledge-producing potentials of dialogues',[114] which will facilitate: '(i) gathering basic information about a case, (ii) filling in gaps in existing historical accounts, (iii) [addressing] more theoretical concerns such as finding omitted variables and hypotheses (iv) and uncovering causal processes'.[115] Interviews may also corroborate and qualify other sources.[116] The use of the semi-structured interviews necessitated a form of conversation that was experience-focused. The documentation analysed was gathered from official state websites and relevant application forms, statements from interviewees, speeches and legislation.

The first part of the empirical data collection involved a chronological compilation of the Russian and Hungarian extraterritorial naturalisation processes regarding legislative and constitutional amendments. The data was collated using several methods; first, I employed an internet keyword search using time and region-specific settings. Second, events and legislation changes were elicited during the interviewing stages of the research, which were

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[113] Ibid., 277-8.
[114] Svend Brinkmann, *Qualitative Interviewing* (Oxford University Press, 2013), 21.
[115] George and Bennett, *Case Studies and Theory Development in the Social Sciences*.
[116] Oisín Tansey, "Process Tracing and Elite Interviewing: A Case for Non-Probability Sampling," *PS: Political Science & Politics* 40, no. 4 (2007).

then triangulated with sources found on the internet. Third, I used the data referenced by other scholars engaged with similar topics.

The second part of the empirics involved a 'web scrape' of the Russian Federation's Kremlin website in collating all the public statements made by Vladimir Putin[117] and the Hungarian Government's site for comments made by Viktor Orbán,[118] into CSV format. This web scape was conducted using the Python package 'Scrapy'. The CSV documents were then converted into individual RTF documents. This collection of RTF documents, which were then raw data, were then processed using NVivo 12, a qualitative data analysis software package. The data was 'queried' using text searches and word frequency searches to identify the most commonly used words in official rhetoric about both states' extraterritorial naturalisations. I created a list of keywords deductively from a combination of the academic literature relevant to the topic and from previous utterances in speeches already known to me. The list grew through a snow-ball effect during the process, as I was able to add additional keywords to the search as I could see commonly used terms in speeches found through the initial search queries.

Throughout the thesis, when reference relevant quotes found during this process in the subsequent chapters of this thesis, I have included a link to the original site on which they were found, even though these quotes were not found through the respective websites search function. These word frequencies in isolation are not fundamental to the thesis's methodology; however, they provided a platform for the analysis of the official state rhetoric more generally and enabling an efficient sorting method of relevant and irrelevant statements. It is essential to note the limitations of this aspect of the methodology. Both Russia and Hungary have English translated transcripts uploaded to their respective websites, and it is

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[117] The Kremlin, "President of Russia Transcripts."
[118] Government of Hungary, "Prime Minister's Speeches," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches
Previously: -
http://www.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches.

these translations I used for the data. It may be that my approach is limited because I only searched the English translations of these speeches, which may mask linguistic nuances. However, as these are official translations, published and approved by the two governments, this limitation does not render the process futile.

The third element of the data collection involved human participants. Due to the impact of the Covid-19 pandemic, the plans for my empirical data collection process changed in line with the United Kingdom Research and Innovation (UKRI) and Economic and Social Research Council (ESRC)'s recommendations. Initially, I had planned to conduct two separate fieldwork trips, the first to the Baltic States, Ukraine, Romania, and Georgia, which I completed in the Spring of 2019. I was due to conduct the second trip in the Spring of 2020 to Hungary, Serbia, Slovakia, and Moldova. The restrictions on travel due to the global pandemic in 2020 meant that this trip was no longer viable. Fortunately, I was able to adapt this research design. In the summer of 2017, in my capacity as a junior researcher at the University of Amsterdam, I conducted fieldwork with the same topic in Hungary, Serbia, and Slovakia. From this trip, I was able to gather unpublished, ungraded data relevant to this thesis. Both fieldwork trips were subject to pre-approved ethics approval. Before the trip in 2017, I completed risk assessments that covered personal safety and the ethical considerations of my research participants. This trip was given clearance by the Amsterdam Institute of Social Science Research (AISSR)'s Ethics Advisory Board. Before the second research trip, I received pre-approval from the University of Oxford's Central University Research Ethics Committee (CUREC). For both trips, I received informed consent from each of my participants and recorded it on a form.[119] This section of the methodology involved semi-structured interviewing the political elite, in two forms: online video interviewing and face-to-face. The elite-level interviewing was conducted in situ in the following locales: Estonia

[119] One participant later partially withdrew their consent over the phone, asking to not be referenced by name.

(Tallinn), Latvia (Riga and Daugavpils), Lithuania (Vilnius and Klaipėda), Ukraine (Kyiv, Berehove, and Uzhhorod), Georgia (Tbilisi), Romania (Bucharest and Cluj-Napoca), Hungary (Budapest and Komárom), Serbia (Novi-Sad, Senta, and Belgrade), Slovakia (Bratislava and Komárno). These locations, shown in the map on Figure 5 below, were selected as they are regions with significant Russian and Hungarian interests and areas in which extraterritorial naturalisations have been conducted. Therefore, no fieldwork was conducted in Russia, given the small likelihood of collecting any data that would deviate from information that could be retrieved using the previously outlined methods. Where possible these interviews were conducted in English, provided the participant was sufficiently proficient; in cases where this was not possible, a translator was present.

The sourcing for interviews with the relevant political elite involved sending requests to the official email addresses of the local and national politicians and civil servants who operate within the realm of topics relating to extraterritorial naturalisations or those who have experienced the policies conducted by other states within their territories. These were completed before commencing the fieldwork in the region. Once on the trip, I also followed up on recommendations for further participants from my initial participants, by using multiple nodal source entrance points to mitigate participant sample bias.

The sourcing and conducting of elite interviews were not without significant hurdles. Firstly, it often took multiple attempts to reach and maintain contact with my proposed interviewees. In some instances this involved emailing, telephoning and sending letters via the postal service in order for the potential interviewee to respond. The second limitation was financial; given the need to work within a preordained budget, it meant that time in each fieldwork site was limited, thus schedules had to be strictly arranged and followed. The result was that when interviewees altered the agenda for our interviews, I was occasionally inflexible to their needs, therefore requiring a follow up meeting at a later date or via online video conference software. Third, some of the interviewees did not turn up for the interview

or cancelled at the last minute. Two of the proposed interviewees, one in Lithuania and one in Romania, were charged and found guilty of high-level corruption hours before the scheduled meeting.

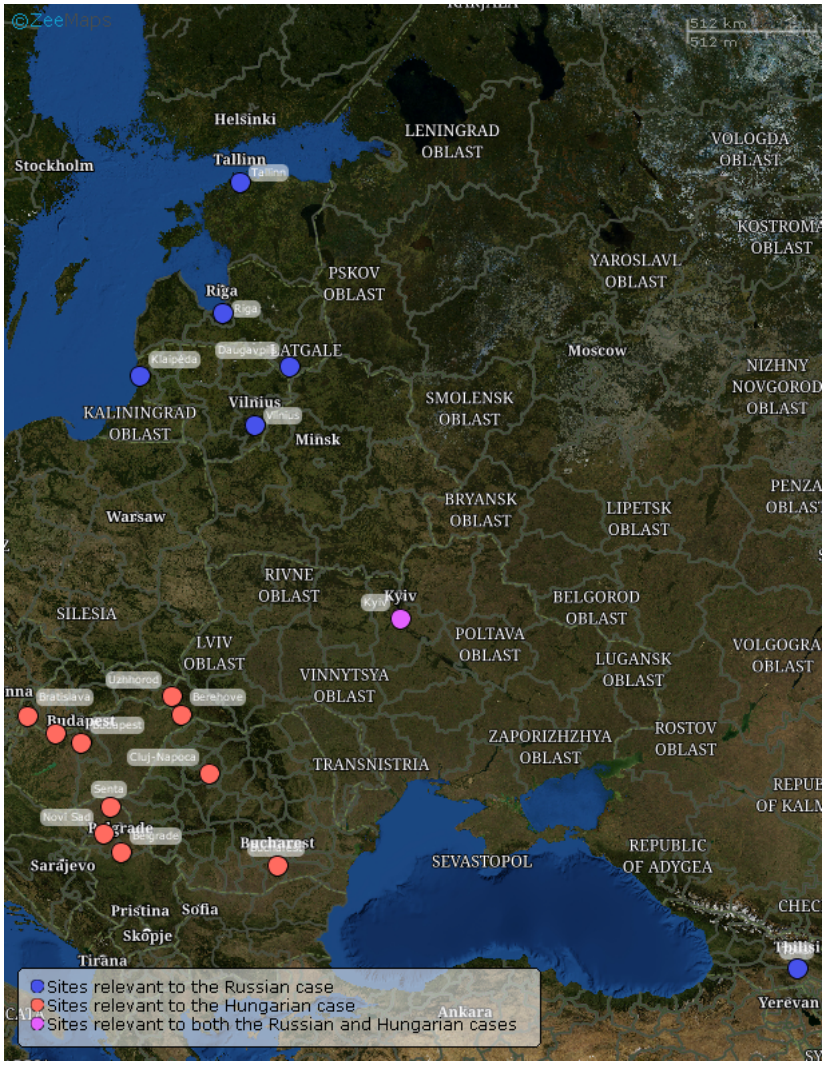


Figure 5. Map of research sites

Travel to Russia in my current role as a DPhil candidate is potentially dangerous; this is also why I have not, and will not, conduct any research in South Ossetia or Abkhazia, as these two regions have become increasingly hostile to visitors. I would not receive student or research visas to these areas, and I would be risking arrest should I enter under another visa. The recent arrests of PhD students charged with espionage, was also a factor in my decision-

making process to not attempt to travel to Russia or Abkhazia or South Ossetia.[120] I also believe that the chances of obtaining useful, relevant data from officials would be slim. It may be that I would be able to obtain useful data at the citizen level, but to do this in person would be a risk that I am not prepared to take.

Conclusion

This chapter has outlined the extraterritorial naturalisation puzzle; conventional wisdom would suggest top-down initiated citizenship legislative changes ought to be applied uniformly to all suitable locations. However, in practice, there have been discrepancies in the application of legislation regarding locale and timings. It has revealed a gap in our understandings of the (extra)naturalisation practices. Following a brief review of the relevant literature and conceptual and theoretical context, it has shown why the study is related to an interdisciplinary audience, drawing on International Relations' meta-theoretical debates of realism and constructivism. It has highlighted the relevant theoretical concerns relating to the nation, nationalism and the role of identity in extraterritorial naturalisation policies. It provides a rationale for selecting Russia and Hungary as case studies. Finally, the methodology and methodological concerns are summarised, explaining the choice in opting for a qualitative, process-tracing methodology based on elite interviewing, in the Baltic states, Ukraine, Romania, Hungary, Serbia, Slovakia, and Georgia.

The following chapter will reveal the conceptual and theoretical framework for the thesis, highlighting the tensions in the concepts and international legal norms that are often taken for granted in International Relations.

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[120] BBC News, "Matthew Hedges: Durham Student Charged with UAE Spying," BBC, https://www.bbc.co.uk/news/uk-england-tyne-45871581.

Chapter 1: Extraterritorial Naturalisations - A Conceptual, Theoretical, and Legal Framework

This chapter will expound the network of concepts and theories relevant to explaining extraterritorial naturalisation as a practice from the perspective of the state and how the practice functions within the international political system. It will address the international norms, laws, and political trends which affect and enable extraterritorial naturalisations. The purpose is to contextualise the changing nature of the relationship between the state and 'its' population domestically and abroad and position extraterritorial naturalisations within this context. It will show how the inherent tensions in the Westphalian sovereign system create complexities regarding national and territorial sovereignty, power, and self-determination; it will demonstrate these complexities in the legal framework enable the practice of strategic extraterritorial naturalisation. It will also explain the impact of increasing global tolerance of dual citizenship and the structural impacts on the focus of this thesis. It will discuss sovereignty while referring to the guiding principles of nationality borne out of the *Nottebohm* court case. By examining definitions of annexation, it will present the case that the term annexation of populations can be used as a metaphor for extraterritorial naturalisations, ultimately a strategic objective of the naturalising state, before conceptualising the term strategy.

International (contested) norms and law

For scholars of International Relations, defining and analysing international laws and norms remains an existent challenge.[121] Fundamental and vast differences exist between international

[121] See Hans Kelsen, *Principles of International Law* (The Lawbook Exchange, Ltd., 2003).

laws' interpretations, mirroring the debates between legal scholars at a domestic level.[122] Crucially, however, conversations within jurisprudence about international law have a distinguishing element to their domestic counterparts: whether international laws exist in the absence of an authority with the appropriate jurisdiction and authority to pass judgment and impose a penalty for infringement.[123] Without this supra-national authority presiding over the international system of states, it can and has been argued that 'hard' international laws do not exist as they do within a state's domestic legal structure.[124] Some have argued that there are 'soft' international laws that regulate the inter-state system, even without an institution with the means, legitimacy or accountability to enforce these regulations.[125] However, if this is accepted, it is unclear what is the difference between international law and international norms, nor why this apparent distinction is necessary.[126] Tannenwald defines norms as 'a shared expectation about behaviour, a standard of right or wrong. Norms are prescriptions or proscriptions for behaviour.'[127] International norms do exist, and like laws, regulate behaviour.[128] International norms are social constructs that alter and evolve; they become reinforced and consolidated through behaviour replicating that prescribed by the norm. Accordingly, if a norm is challenged with frequency, by significant parties, it can become weaker and endangered or even eradicated.[129]

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[122] For example, the legal challenge brought to the Commission on the Limits of the Continental Shelf, a UN commission, by Argentina over the United Kingdom's claims to the Antarctic shelf is a legal dispute at the international level but shares many similarities to a property dispute between two parties at a national, domestic level. Owen Bowcott, "Argentina Ready to Challenge Britain's Antarctic Claims," The Guardian, http://www.theguardian.com/environment/2007/oct/19/climatechange.fossilfuels.
[123] Rosalyn Higgins, *Problems and Process: International Law and How We Use It* (Oxford University Press, 1995).
[124] A Vaughn Lowe, "Do General Rules of International Law Exist?," *Review of International Studies* 9, no. 3 (1983).
[125] Abbott and Snidal, "Hard and Soft Law in International Governance."; Andrew T Guzman and Timothy L Meyer, "International Soft Law," *Journal of Legal Analysis* 2, no. 1 (2010).
[126] Gary Goertz, Paul Francis Diehl, and Alexandru Balas, *The Puzzle of Peace: The Evolution of Peace in the International System* (Oxford University Press, 2016).
[127] Nina Tannenwald, "The Nuclear Taboo: The United States and the Normative Basis of Nuclear Non-Use," *International organization* 53, no. 3 (1999): 436.
[128] Goertz, Diehl, and Balas, *The Puzzle of Peace: The Evolution of Peace in the International System*, 102.
[129] Ibid., 103.

The Organisation for Security and Cooperation in Europe (OSCE) report entitled Bolzano-Bozen Recommendations on National Minorities in Inter-State Relations lists general principles relating to protecting the territorial sovereignty and human rights of national minorities.[130] The second of these proposed principles by the OSCE reflects the international norm of the protection of nationals abroad, which has a historical root going back centuries.[131] However, despite this norm's long history, it remains contested and its enforcement inconsistent and is not considered law.[132] The first of these principles, guiding state action regarding their population abroad, contains two contested terms: sovereignty and jurisdiction, two concepts that shape the fundamentals of the ontology of states within the international political system. It is not within the scope of this section to challenge existing or contemporary understandings of the intricate notions arising out of sovereignty. However, a discussion of these concepts' evolution is necessary to provide operational definitions that underpin this project. In doing so, it may be possible to see later where the boundaries of sovereignty are being contested, eroded, extended or consolidated.

Sovereignty is a complex, multifaceted concept that underpins the entire international political system.[133] More broadly, sovereignty has been defined as 'supreme power or

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[130] The following are the first two principles in the Organization for Security and Co-operation in Europe (OSCE) High Commision on National Minorities, "The Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations & Explanatory Note," *The Hague: OSCE High Commissioner on National Minorities* (2008).: -
Sovereignty comprises the jurisdiction of the State over its territory and population and is constrained only by the limits established by international law. No State may exercise jurisdiction over the population or part of the population of another State within the territory of that State without its consent.

Sovereignty also implies the obligation of the State to respect and to ensure the protection of human rights and fundamental freedoms of all persons within its territory and subject to its jurisdiction, including the rights and freedoms of persons belonging to national minorities. The respect for and protection of minority rights is primarily the responsibility of the State where the minority resides.

[131] James A Green, "Passportisation, Peacekeepers and Proportionality: The Russian Claim of the Protection of Nationals Abroad in Self-Defence," in *Conflict in the Caucasus* (Springer, 2010).; Colin Warbrick, "Protection of Nationals Abroad," *International and Comparative Law Quarterly* (1988).; Thomas C Wingfield, "Forcible Protection of Nationals Abroad," *Dickinson Law Review* 104 (1999).

[132] See, Roy Allison, "The Russian Case for Military Intervention in Georgia: International Law, Norms and Political Calculation," *European security* 18, no. 2 (2009). Erna Burai, "Parody as Norm Contestation: Russian Normative Justifications in Georgia and Ukraine and Their Implications for Global Norms," *Global Society* 30, no. 1 (2016).

[133] Andrew Hurrell, "Norms and Ethics in International Relations," *Handbook of international relations* (2002).

authority'.[134] However, this definition is excessively broad to lack tangible benefit to those assessing contemporary understandings of sovereignty. It is sometimes assumed that sovereignty is fundamentally territorial and is an unambiguous fixed constant[135] within which the state maintains and exercises its monopoly on the use of force.[136] Within this school of thought, territorial sovereignty is the underlying principle of the international political order and justifies diplomatic and military escalation when states violate non-interventionist principles. This rigid conceptualisation is, however, inadequate. Hinsley critically examines the pervasive term asserting that it is a social construct subject to change.[137] While Krasner argues for a disaggregated conceptualisation of sovereignty in stating:

> The term sovereignty has been used in four different ways—international legal sovereignty, Westphalian sovereignty, domestic sovereignty, and interdependence sovereignty. International legal sovereignty refers to the practices associated with mutual recognition, usually between territorial entities that have formal juridical independence. Westphalian sovereignty refers to a political organisation based on the exclusion of external actors from authority structures within a given territory. Domestic sovereignty refers to the formal organisation of political authority within the state and the ability of public authorities to exercise effective control within the borders of their polity. Finally, interdependence sovereignty refers to the ability of public authorities to regulate the flow of information, ideas, goods, people, pollutants, or capital across the borders of their state.[138]

The two most relevant forms of sovereignty to this thesis from Krasner's typology are international legal sovereignty and Westphalian sovereignty, both of which are interrelated.[139] The difference Krasner argues is that 'the rule for international legal sovereignty is that recognition is extended to territorial entities that have formal juridical independence. The rule

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[134] Daniel Philpott, "Sovereignty: An Introduction and Brief History," *Journal of international affairs* (1995).
[135] J Samuel Barkin and Bruce Cronin, "The State and the Nation: Changing Norms and the Rules of Sovereignty in International Relations," *International organization* 48, no. 1 (1994).
[136] John Agnew, "The Territorial Trap: The Geographical Assumptions of International Relations Theory," *Review of international political economy* 1, no. 1 (1994).
[137] Francis Harry Hinsley, *Sovereignty* (Cambridge University Press Archive, 1986).
[138] Stephen D Krasner, *Sovereignty: Organized Hypocrisy* (Princeton University Press, 1999), 1.
[139] The use of the term 'Westphalia' in Westphalian sovereignty is contentious as it is suggested the relevance of the Treaty of Westphalia to contemporary understandings of territorial sovereignty is overstated.

for Westphalian sovereignty is the exclusion of external actors, whether *de facto* or *de jure*, from the territory of a state.'[140]

Sovereignty relies on legitimation practices, which are subject to change in international norm fluctuations. State practices shape international norms which are liable to change over time, albeit slowly.[141] In an attempt to tease out the facets of sovereignty, Barker and Cronin argue that definitions have tended to be too focused on legal aspects, and advocate for a more nuanced understanding of sovereignty.[142] They attribute difficulties in finding conceptual consensus: 'a historical tension between state sovereignty, which stresses the link between sovereign authority and defined territory, and national sovereignty, which emphasises a link between sovereign authority and a defined population'.[143] This tension is apt when considering cases where alterations to a state's national membership requirements occur.

Until recently, scholars of International Relations have often taken the Peace or Treaties of Westphalia of 1648 as the beginning of contemporary territorial sovereignty.[144] The argument is that the Treaty of Westphalia resolved the conflict between 'universalism and particularism or between empire and sovereignty',[145] thus instilling a system of state sovereignty that is recognisable today.[146] As Brown contends,

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[140] Krasner, *Sovereignty: Organized Hypocrisy*.
[141] For example, 'Responsibility to Protect' means that states may diminish their sovereignty if they commit gross human rights abuses (or fail to prevent them in their territory).
[142] Barkin and Cronin, "The State and the Nation: Changing Norms and the Rules of Sovereignty in International Relations."
[143] Ibid., 108.
[144] For accounts of this nature, see, for example, David Boucher, *Political Theories of International Relations*, vol. 141 (Oxford: Oxford University Press, 1998).; Seyom Brown, *International Relations in a Changing Global System: Toward a Theory of the World Polity* (Boulder, Colorado: Westview, 1992).; Leo Gross, "The Peace of Westphalia, 1648–1948," *American Journal of International Law* 42, no. 1 (1948).; Hans J Morgenthau, "Politics among Nations: The Struggle for Power and Peace, Revised by Kenneth W," *Thompson. New York: McGraw Hill* (1985).
[145] Andreas Osiander, "Sovereignty, International Relations, and the Westphalian Myth," *International organization* 55, no. 2 (2001): 260.
[146] Derek Croxton, "The Peace of Westphalia of 1648 and the Origins of Sovereignty," *The international history review* 21, no. 3 (1999).

> Even to this day two principles of interstate relations codified in 1648 constitute the normative core of international law: (1) the government of each country is unequivocally sovereign within its territorial jurisdiction, and (2) countries shall not interfere in each other's domestic affairs.[147]

Numerous scholars have since challenged this account; Edward Keene, suggests that this narrative about the importance of Westphalia for contemporary understandings of sovereignty is an inaccurate representation of history, and in fact, has roots not in the seventeenth century but later in discussions arising out of the French Revolution.[148] While Osiander, argues that the French lawyers became fixated about sovereignty during the eighteenth and nineteenth centuries.[149] One of the underlying assumptions about this form of Westphalian sovereignty is that it created a system whereby no state should be considered more or less sovereign than another. As Boucher argues, Westphalia 'sanctioned the formal equality and legitimacy of an array of state actors.'[150] Bull, among others, contests the notion of equal recognition of sovereignty, as he argues that the long century, between the Peace of Westphalia in 1698 until the Congress of Vienna in 1815,[151] the Great Powers 'saw themselves as guardians' with a clear systemic hierarchy present in international society.[152] The battles for hegemony between the Great Powers, created a system of unequal sovereignty.[153] Sovereignty not on equal, mutual recognition but hierarchy.[154] 'The principle of territorial sovereignty seeks to

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[147] Brown, *International Relations in a Changing Global System: Toward a Theory of the World Polity*, 74.
[148] Edward Keene, *Beyond the Anarchical Society: Grotius, Colonialism and Order in World Politics* (Cambridge University Press, 2002).
[149] Osiander, "Sovereignty, International Relations, and the Westphalian Myth."
[150] Boucher, *Political Theories of International Relations*, 141, 289.
[151] The Long Eighteenth Century was a period of substantial conflict between the Great Powers in Europe, as the French emerged from the Thirty-Year War as the hegemon. During this time the other Great Powers attempting to mitigate this ambition, resulting in many significant wars including The War of the Spanish Succession 1701 to 1714, the War of the Austrian Succession 1740 to 1748, The Seven Years' War between 1756 and 1763, and the Napoleonic Wars 1803 to 1815. For Bull, the institutional emergence of sovereignty between the Great Powers began at the Congress of Vienna in 1815, which immediately followed Napoleonic France's demise. The result of the Congress of Vienna meant that amongst the Great Powers, there were no hegemonic aspirations across the system and that limited conflict within Europe until 1910. Ultimately the Congress of Vienna, both defended and limited the rights of the sovereign state.
[152] Hedley Bull, *The Anarchical Society: A Study of Order in World Politics* (Macmillan International Higher Education, 2012), 17.
[153] Gerry Simpson, *Great Powers and Outlaw States: Unequal Sovereigns in the International Legal Order*, vol. 32 (Cambridge University Press, 2004).
[154] Krasner, *Sovereignty: Organized Hypocrisy*.

guarantee and protect the exclusive performance of state functions within the territory of a state',[155] and is intertwined with the idea of non-intervention; the European Great Powers, until the Twentieth Century, wished to create a system which mitigated conflict over territory. The Peace of Westphalia that evolved from the Treaty of Münster between the Dutch and the Spanish resulted in the protection of religious minorities from persecution, some aspects of which remain today.[156] This agreement is essential, as it resulted in the notion of *droit de regard* – meaning both the right to inspect and right to be held in esteem.[157] Meaning, state X might claim to hold the right to scrutinise state Y's activities regarding state X's citizens within state Y; simultaneously, state Y can protest such scrutiny by state X on the basis that this is an infringement of state Y's territorial sovereign integrity. Therefore, the two concepts of territorial state sovereignty and *droit de regard* remain in tension and sovereign units are not wholly independent of one another as claimed.[158] Empirically, there are frequent cases where both arguments hold simultaneously, as shown later in this thesis. There is a tension between sovereignty and territorial integrity – between national and territorial sovereign units, which are not as independent of one another as is often perceived.[159] The numerous tensions and examples of infringements of territorial sovereignty have led Krasner to argue that adherence to the norm of sovereignty integrity is a myth.[160] He suggests states are driven by a logic of consequence, rather than a logic of appropriateness. He argues:

> The basic principle of Westphalian sovereignty, the autonomy of domestic structures, has frequently been compromised through intervention in the form of coercion or imposition by more powerful states, or through contracts or conventions that have involved invitations for external actors to influence domestic authority structures. While the basic principle of international legal sovereignty, the extension of recognition to

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[155] Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."
[156] Croxton, "The Peace of Westphalia of 1648 and the Origins of Sovereignty."
[157] Kalypso Nicolaidis, "Mutual Recognition: Promise and Denial, from Sapiens to Brexit," *Current Legal Problems* 70, no. 1 (2017).
[158] S Neil MacFarlane and Natalie Sabanadze, "Sovereignty and Self-Determination: Where Are We?," *International Journal* 68, no. 4 (2013).
[159] Ibid.
[160] Krasner, *Sovereignty: Organized Hypocrisy*.

> juridically autonomous territorial entities, has been more widely honoured, it too has been violated.[161]

Towards the end of the twentieth century, state practices have shaped the international norms regarding conceptualisations of sovereignty.[162] States continued to formulate policies for their people as previously, but the people these policies were designed for, no longer resided solely within their territorial space, but also beyond these borders. In turn, this change has moulded diaspora engagement policies generally and extraterritorial naturalisation policies, as states can engage with 'their' populations abroad, a practice which previously would have been considered an infringement on territorial sovereignty.[163] Throughout, this thesis will examine these structural and systemic factors in detail. However, for Hungary and Russia, the post-communist era has meant the state's conceptualisation of its population is now politically salient.[164]

The extraterritorial naturalisations are contentious with regards to territorial sovereignty. As Peters argues,

> Nationality depends on statehood and vice versa. The bestowment of nationality upon an alien is an official act by the conferring state and an emanation of its sovereignty. … Through the enlargement of its nation, which is a constituent element of its statehood, a State in a way also enlarges itself.'[165]

Likewise, it also impacts personal jurisdiction:

> The international effects are even more significant when persons residing abroad are involved because nationality is a basis for the exercise of exterritorial jurisdiction. The higher the number of a state's nationals abroad, the more often that state will be under

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[161] Ibid., 220.
[162] The shaping of conceptualisations of sovereignty is not necessarily new, but somewhat resurgent as there are examples of similar processes in the past. For example, the basis of the dispute which triggered the Crimean War was that both Russia and France demanded the ability to protect Orthodox and Catholic pilgrims in the Ottoman-controlled Holy Land.
[163] Robin Cohen, "Diasporas and the Nation-State: From Victims to Challengers," *International Affairs (Royal Institute of International Affairs 1944-)* 72, no. 3 (1996).
[164] Ben Fowkes, *Ethnicity and Ethnic Conflict in the Post-Communist World* (Springer, 2002).
[165] Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."

> international law allowed to apply to its laws outside its territory, even if enforcement of those laws is not permitted.[166]

From the perspective of the naturalising state, the result with regards to personal jurisdiction and sovereignty is that the extraterritorial naturalisations' extend a state's legal sphere of influence';[167] this has the potential to have a significant impact on the 'home state', as,

> A political territorial entity with a residential population in which none of the residents possesses the entity's nationality would not be a state in a legal sense. By the act of naturalisation, a state loosens (or even severs) the relationship between the individual and the state of its former nationality, and thus deprives the other state of parts of one of its components, namely its people. Large scale naturalisations undermine the personal jurisdiction of the state to which the affected persons belonged and, to the extent, affects its sovereignty. A state's right to protect its nationals has indeed been a traditional prerogative of sovereignty. Under the premise that states are not ends in themselves, the protection offered to the own nationals is a duty rather than a right of the state.[168]

Peters argues, the legality of extraterritorial naturalisations is contingent on whether or not the 'home state' where the naturalisations occur, is contested as a legal entity.[169]

Legal considerations

Citizenship in international politics is an example of legal duality. Fundamentally, it is *domaine reservé* of states, meaning it is relevant to domestic legislation that determines how each state formulate their citizenship policy. However, in addition to the domestic sphere, citizenship legislation operates within the international realm; the effects of domestic citizenship legislation are felt on the international level and therefore fall under international law.[170] One function and right of sovereign states is to define criteria for citizenship,

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[166] Ibid.
[167] Ibid.
[168] Ibid.
[169] Ibid.
[170] Ibid.

determining who is in and out of the state.[171] The right for states to determine their citizenship criteria is an international norm that guides contemporary understandings of nationality *vis-à-vis* the international political system.

There are several principles enshrined in international law that guide the permissibility of extraterritorial naturalisations. The first guiding principle is that of good neighbourliness, mentioned in the Preamble, and Article 74, of the UN Charter and the UN Friendly Relations Declaration. The principle is most relevant, but not exclusive to, contiguous states. It implies refraining from the use or threat of force in accordance with international law, settling disputes peacefully, the non-interference in the jurisdiction of other states, the respect of the self-determination of peoples, and respecting the sovereign equality of states while fulfilling international obligations in good faith.[172]

The second principle to consider is the stable repartition of jurisdiction, meaning that the extraterritorial naturalisations of persons in another state, should not 'extend their jurisdiction over persons in an artificial manner via exorbitant naturalisations of persons residing in another state'.[173]

Third, is the Nottebohm principle of effective nationality, or in other words, there should be a genuine link between the naturalising state and the individual. In 1955, a judge presiding over a case at the International Court of Justice in the Hague ruled that it is state's prerogative to grant citizenship and the documents that follow, to whomever it wishes under municipal law.[174] This case, known as the Nottebohm case, was brought about by Liechtenstein, in order to force Guatemala to recognise the citizenship, it bestowed upon Friedrich Nottebohm, a German-born citizen. During the Second World War Guatemala, upon

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[171] Torpey, *The Invention of the Passport: Surveillance, Citizenship and the State*.
[172] UN General Assembly, "Declaration on Principles of International Law Concerning Friendly Relations and Cooperation among States in Accordance with the Charter of the United Nations," (24 October 1970).
[173] Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction," 628.
[174] Josef L Kunz, "The Nottebohm Judgment," *American Journal of International Law* 54, no. 3 (1960).

aligning with the allies, arrested Guatemala resident Nottebohm as an enemy alien, despite being a citizen of neutral Lichtenstein. The judge ruled in favour of Guatemala, citing lack of a meaningful connection between Nottebohm and Lichtenstein, or the principle of effective nationality, which came to be known as the 'Nottebohm principle'.[175]

> Naturalisation was asked for not so much for the purpose of obtaining a legal recognition of Nottebohm's membership in fact in the population of Liechtenstein, as it was to enable him to substitute for his status as a national of a belligerent State that of a national of a neutral State, with the sole aim of thus coming within the protection of Liechtenstein but not of becoming wedded to its traditions, its interests, its way of life or of assuming the obligations-other than fiscal obligations-and exercising the rights pertaining to the status thus acquired.[176]

Although this ruling occurred several decades ago, it is still relevant today.[177]

The fourth is the prohibition of the abuse of rights, which includes, the principle of the prohibition of arbitrariness. This principle, applying to both the naturalising state and 'home state', implies that decisions with regards to conducting extraterritorial naturalisations in states abroad and permitting states to naturalise their persons should not be made arbitrarily. The collective naturalisations may well constitute an abuse of rights, mainly if there are elements of coercion - structural or manifest, discrimination, either in the naturalisation requirements or the treatment of the naturalised or non-naturalised following the practice. Extraterritorial naturalisations are illegal in international law if the individual consent is lacking.

It may be argued that if the following principles are not adhered to during the extraterritorial naturalisation process, the naturalisation can be considered exorbitant.[178] Some legal scholars have argued that they ought not to recognise the extraterritorial naturalisations

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[175] Ibid.
[176] Jeffrey L Blackman, "State Successions and Statelessness: The Emerging Right to an Effective Nationality under International Law," *Michigan Journal of International Law* 19 (1997).
[177] Eileen Denza, "The Relationship between International and National Law," *International Law* 423 (2010).
[178] Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."

conducted by some states, and in some instances, can bring cases to international courts as an illegal act.[179]

It is essential to distinguish between the collective extraterritorial naturalisations (*ex lege*) and the extraterritorial naturalisations of individuals. The former, 'is the derivative conferment of nationality by operation of national law, *ipso iure* upon the fulfilment of certain prescribed conditions without individual application by the person concerned, and is thus, by definition, applicable to an entire group.'[180] The most common instances of this form of naturalisation occur during territorial reconfigurations and have been prominent in the processes of decolonisation. It has also been an aspect of attempts to redress mass denaturalisations or cases where populations have been expelled.[181] Although in the instances of extraterritorial naturalisations examined for this thesis are not *prima facie* collective, in that they require an individual's application to begin the process, they may constitute *de facto* collective naturalisations given the large-scale nature of the processes, and the implications for those refusing naturalisations. In other words, individual consent may appear to be present, but within the context, the real choice presented to the individual may not be realistic. This type of naturalisation may create conflict between the individuals' interests and that of the 'home state'.

Accordingly, although extraterritorial naturalisations are permissible under international law, to abide by this norm, the state granting citizenship to an individual does so on the basis that the state demonstrates a genuine link to the individual.[182] This link between the state and individual can, of course, be ambiguous and hard to

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[179] Robert Jennings and Arthur Watts, *Oppenheim's International Law: Volume 1 Peace*, 9 ed. (Oxford University Press, 2008).; Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."
[180] "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."
[181] The expulsion of significant elements of the Spanish population during the Spanish civil war during the Franco regime is an example of such a case.
[182] Robert D Sloane, "Breaking the Genuine Link: The Contemporary International Legal Regulation of Nationality," *Harvard International Law Journal* 50 (2009).

demonstrate. When naturalisations occur at a collective level, establishing a legitimate and meaningful connection between the state and the naturalised is jeopardised.[183] In other words, the Nottebohm principle of effective nationality becomes harder to exhibit with collective naturalisations; this becomes even more pertinent when analysing extraterritorial naturalisations from an international legal position, given there is an absence of residency within the naturalising state, typically a vital component of a link between the two parties under normal circumstances.[184]

The annexation of populations as a metaphor

It is argued here that extraterritorial naturalisation *en masse* is metaphorically comparable to a popular annexation or *annexation of populations*.[185] Contemporary understandings of the term 'annex' are almost exclusively focussed on territory, however, only recently has this definition been so narrow.

Korman, a legal scholar, writing on annexation, suggests that annexations have broadly followed a definitive process: firstly, the 'the territory must be in the effective possession of the conqueror'.[186] Secondly, 'that conqueror may proceed to annex conquered territory only after the enemy has ceased to fight for the recovery of the lost possession'.[187]

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[183] See. Arraiza, "Good Neighbourliness as a Limit to Extraterritorial Citizenship: The Case of Hungary and Slovakia."; Rainer Bauböck and Iseult Honohan, "Access to Citizenship in Europe: Birthright and Naturalisation" (paper presented at the EUDO Dissemination Conference Brussels, 2010).; Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."

[184] Judit Tóth, "The Genuine Link Principle in Nationality Law," *Hungarian Year Book of International Law & European Law* (2014).

[185] This term was first used, briefly, by Jaroslaw Pelenski in 1967 to describe the Muscovite claims to the Kazan Khanate in the 16th Century. Jaroslaw Pelenski, "Muscovite Imperial Claims to the Kazan Khanate," *Slavic Review* 26, no. 4 (1967). ; it has also been used by Charles Hirschman and Yeoh Suan-Pow in 1979 to describe urbanization patterns in Malaysia between 1947-70. Charles Hirschman and Yeoh Suan-Pow, "Ethnic Patterns of Urbanization in Peninsular Malaysia, 1947-1970," *Asian Journal of Social Science* 7, no. 1 (1979). The term is not conceptualised, explained or defined in either paper.

[186] Sharon Korman, *The Right of Conquest: The Acquisition of Territory by Force in International Law and Practice* (Clarendon Press, 1996), 8-9.

[187] Ibid., 113.

Third, 'conquest gives title only when there is a manifest intention to acquire the conquered territory'.[188] Fourth, there needs to be a coherent 'proclamation of annexation'.[189] Even without an explicit proclamation of annexation, according to Korman, the last requirement can be satisfied if 'other acts demonstrating the will of the conqueror to extend its sovereignty over the territory were equally operative.'[190]

Before the international norm against conquest became established in 1945,[191] the international system was 'dominated by unrestricted right of war and recognition of conquests',[192] and, as Gerson argues, annexation was a typical state practice, as 'historically, a conquest of enemy territory would be followed by annexation at the end of the war'.[193] Annexation, therefore, was a primary driver of internationally recognised legitimate changes to territorial sovereignty. States also regularly exchanged territories, often as a means of maintaining the balance of power.[194] The norm against conquest has dramatically limited but has not entirely eradicated annexations. Since the international norm against conquest was established and became a central tenet of the UN Charter[195] following the end of the Second World War,[196] annexations have occurred,[197] but almost solely by larger powers, and have

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[188] Ibid., 118.
[189] Ibid., 125.
[190] Ibid., 129.
[191] Tanisha M Fazal, *State Death: The Politics and Geography of Conquest, Occupation, and Annexation* (Princeton University Press, 2011).
[192] Ian Brownlie, *International Law and the Use of Force by States* (Oxford University Press, 1963), 19-20.
[193] Allan Gerson, "War, Conquered Territory, and Military Occupation in the Contemporary International Legal System," *Harvard International Law Journal* 18 (1977): 530-1.
[194] Korman, *The Right of Conquest: The Acquisition of Territory by Force in International Law and Practice*.
[195] Goertz, Diehl, and Balas, *The Puzzle of Peace: The Evolution of Peace in the International System*, 105.
[196] Fazal, *State Death: The Politics and Geography of Conquest, Occupation, and Annexation*.
[197] For instance: 1950 -West Bank by Jordan from Israel, 1954-Ogaden by Ethiopia from the UK, 1955-Rockall by the UK, 1957- Sikkim by India from China, 1959-Tibet by China, 1959- West Papua by Indonesia, 1961-Goa by India from Portugal, 1964- Zanzibar by the UK, 1967- Golan Heights by Israel from Syria, 1967-East Jerusalem by Israel from Jordan, 1969- West Sahara by Morocco from Mauritania, 1975- East Timor by Indonesia,1989-Golan Heights by Israel from Syria, 1990- Kuwait by Iraq, 2014- Crimea by Russia from Ukraine. Alice L Conklin, "A Mission to Civilize: The Republican Idea of Empire in France and West Africa, 1895-1930," (1997); David A Lake and Donald S Rothchild, *The International Spread of Ethnic Conflict: Fear, Diffusion, and Escalation* (Princeton University Press, 1998); ibid.; Fazal, *State Death: The Politics and Geography of Conquest, Occupation, and Annexation*.; Melvyn C Goldstein, *A History of Modern Tibet, 1913-1951: The Demise of the Lamaist State* (University of California Press, 1991).; Andreas Kappeler, *The Russian Empire: A Multi-Ethnic History* (Routledge, 2014).; Judith Brown and Wm Roger Louis, *The Oxford History of the British Empire: Volume Iv: The Twentieth Century* (Oxford: Oxford University Press 1999).; C. W Newbury and A. S Kanya-Forstner, "French Policy and the Origins of the Scramble for West Africa," *The Journal of*

been defended on the grounds of 'strategic security'.[198] Crucially for this thesis, annexation has also been defended by those arguing that the territorial change is legitimate as it occurs to protect a population's 'right of self-determination'.[199] Therefore, the annexation can be considered legal if 'the inhabitants of the annexed territory wish to be brought under the jurisdiction of the occupying state – provided that the conquest had not resulted from illegal aggression against the state whose territory is occupied'.[200] The contested notion of self-determination is embodied in Article I of the Charter of the United Nations.[201] However, the Charter refers explicitly to *peoples*, rather than *nations*;[202] this is problematic given that national self-determination has presumptions of statehood, but at the collective level, for peoples, it does not.

It is proposed that the political phenomenon examined in this thesis, the state initiated collective extraterritorial naturalisations of target peoples to fulfil strategic aims, is metaphorically, but not legally comparable to an *annexation of populations.* Contemporary uses of the term 'annex' have nearly exclusively referred to the legal aspects of territorial possession changes; this is a relatively recent development of the definition. The Oxford English Dictionary defines annex as to:

1. add as an extra or subordinate part, especially to a document.

African History 10, no. 02 (1969).; Richard A Pierce, *Russian Central Asia, 1867-1917: A Study in Colonial Rule*, vol. 5 (Berkeley, California: University of California Press 1960).

[198] Korman, *The Right of Conquest: The Acquisition of Territory by Force in International Law and Practice*, 171.

[199] Ibid., 219.

[200] Ibid.

[201] 'The Purposes of the United Nations are:
1. To maintain international peace and security, and to that end: to take effective collective measures for the prevention and removal of threats to the peace, and for the suppression of acts of aggression or other breaches of the peace, and to bring about by peaceful means, and in conformity with the principles of justice and international law, adjustment or settlement of international disputes or situations which might lead to a breach of the peace.
2. To develop friendly relations among nations based on respect for the principle of equal rights and self-determination of peoples, and to take other appropriate measures to strengthen universal peace.
3. To achieve international cooperation in solving international problems of an economic, social, cultural, or humanitarian character, and in promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction as to race, sex, language, or religion; and
4. To be a centre for harmonizing the actions of nations in the attainment of these common ends.' Source, United Nations, "UN Charter (Full Text)," https://www.un.org/en/sections/un-charter/un-charter-full-text/.

[202] Frederic L Kirgis, "The Degrees of Self-Determination in the United Nations Era," *American Journal of International Law* 88, no. 2 (1994). Emphasis my own.

2. add (territory) to one's own territory by appropriation.[203]

The use of the word 'annexation' in my metaphorical term, the annexation of population, is not merely an attempt to stretch the term previously used for territory but uses many of the mechanisms detailed above, with some of the strategic implications that territorial acquisitions entail. Using the terms population and annexation might initially appear incongruous, especially if we are only to recall narrow contemporary definitions, but a broader definition suggests the metaphor can be used appropriately; the Shorter Oxford English Dictionary on Historical Principles provides the following definitions of the verb annex:

1. To join (to).
2. To unite materially, as an accessory
3. To append.
4. To affix (a seal, or signature).
5. To attach as an attribute, condition, or consequence.[204]

If we consider this definition when analysing the collective extraterritorial naturalisations, several of these meanings are apt. First, the naturalisations result in a joining of one population to another or the state. Second, if we take an instrumental view of citizens having a tangible benefit to the state, then extraterritorial naturalisations can result in uniting material possession. Third, the extraterritorial naturalisations might be considered a process by which these populations are 'attached' to the state 'as an attribute'.[205] The use of the concept annexation of populations does not merely interchange territory for population but begins to get at the complicated relationship between territoriality and a population. Territory does not replace population in these annexations. States conduct annexations of populations with a specific territory in mind. As will be outlined later in the thesis, an annexation of populations

[203] Angus Stevenson, *Oxford Dictionary of English* (Oxford University Press, 2010).
[204] William Little et al., "The Shorter Oxford English Dictionary on Historical Principles," (1992).
[205] Ibid.

can, but does not always, result in effective control of the territory.[206] The annexation of populations does not occur in a territory vacuum, and the relationship between the naturalising state and the territory on which the recently naturalised population reside is altered.

(Dual) citizenship

From a legal perspective, as Peters states, 'although current international law does not proscribe or seek to eliminate dual nationality, it does not inversely mandate its acceptance.'[207] Citizenship can be taken to mean 'a status of membership in a particular political community that entails equal fundamental rights, legal obligations and opportunities to participate actively in political decision making';[208] upon its conception, citizenship was a package associated with a single state. However, since the 1950s, the number of states allowing dual citizenship has increased more than tenfold, from fewer than five in 1950 to greater than fifty by 2005.[209] Increases in global mobility and movement part explain the phenomenon, to the extent that it could be claimed that 'citizenship is clearly not confined within territorial borders.'[210] From the individual's perspective, dual citizenship is a means to increase mobility and a legitimate manner through which to express multiple identities and belonging legally.[211] Much of the debate on dual citizenship is framed from this perspective,

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[206] A historical example where this does not occur is Sudetenland, a territory encompassing the Sudeten mountains now in Czechia and Poland, where significant numbers of ethnic Germans resided, without German passports, until Adolf Hitler passed the Naturalization Acts on 10 October 1938 and 16 March 1939, which conferred German citizenship to these ethnic Germans, as part of Nazi Germany's annexation of the territory. However, Nazi Germany relinquished control of the territory to Czechoslovakia and Poland, as a result of the loss of the Second World War. Robert W Dean, "Bonn-Prague Relations: The Politics of Reconciliation," *The World Today* 29, no. 4 (1973).

[207] Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."

[208] Rainer Bauböck, "The Rights and Duties of External Citizenship," *Citizenship studies* 13, no. 5 (2009).

[209] Sejersen, "'I Vow to Thee My Countries"–the Expansion of Dual Citizenship in the 21st Century."

[210] Bauböck, "The Rights and Duties of External Citizenship."

[211] Peter J Spiro, "Dual Citizenship as Human Right," *International journal of constitutional law* 8, no. 1 (2010); Miriam Feldblum, "Reconfiguring Citizenship in Western Europe," *op. cit* (1998).

as a normatively positive phenomenon that highlights the benefits of an increasingly globalised world[212] or claiming it to be a human right.[213] For the individual, accepting another citizenship provides the opportunity to opt into another package of rights and duties. However, while the individual might have an opportunity to double their rights, their duties are not necessarily doubled; when one state's duties become too onerous, the dual citizen maintains the possibility to renounce their least desirable citizenship. For instance, if one of a dual citizen's states decide to introduce mandatory military conscription for all citizens, it remains the citizen's prerogative to renounce this state's citizenship, should they feel this is an overly burdensome duty. International law protects this right to renounce, and the right of exit, but it is not permissible to become stateless, primarily because states are prohibited from making people stateless.[214] From the perspective of the individual, the dual citizen is often, but not always privileged.[215] This obtainment of a more privileged position might then explain the enthusiasm in buy-in from those offered new citizenship.

From the state's perspective, it is less obvious why there has been an increase in toleration of dual citizenship, given the potential convolutions that arise from permitting the practice. Faist argues that only path dependency can explain the greater toleration of dual citizenship rather than it being a desire of states to permit it.[216] As Sejersen argues, 'dual citizenship breaks with the segmentary logic of the classic nation-state, according to which

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[212] Francesca Mazzolari, "Dual Citizenship Rights: Do They Make More and Richer Citizens?," *Demography* 46, no. 1 (2009); Florian Bieber, "Dual Citizenship Can Be a Solution, Not a Problem," *European Union Democracy Observatory on Citizenship (EUDO)* (2010).
[213] Spiro, "Dual Citizenship as Human Right."
[214] Bauböck, "The Rights and Duties of External Citizenship." There have been instances of states making individuals stateless because it is necessary for the interests of national security. For example, in 2019, the UK government revoked the citizenship of Shamima Begum due to her involvement with ISIS in Syria, leaving her stateless. The UK government argued that she could obtain Bangladeshi citizenship because of her ancestry, a claim denied by the Bangladeshi government. Hanna; Swann Yusuf, Steve, "Shamima Begum: Lawyer Says Teen Was 'Groomed'," BBC News, https://www.bbc.com/news/uk-48444604.
[215] Dual taxation liability is a notable exception to the privileged status
[216] Thomas Faist, Jürgen Gerdes, and Beate Rieple, "Dual Citizenship as a Path-Dependent Process 1," *International migration review* 38, no. 3 (2004).

one could belong to only one state at a time.'[217] There is another position that assumes that, because states often treat people as a resource, then overlapping membership diminishes the resource capacity of the state.[218] Others argue that dual citizenship proposes a security threat.[219] Some states are vehemently opposed to the phenomenon of dual citizenship; Iran, for instance, has infamously jailed dual citizens on spurious espionage charges, initially beginning with charging dual Iranian citizens,[220] then charging other dual citizens who have no connection with Iran.[221]

Some scholars have argued that 'that national citizenship is losing its political, legal, economic, social, and symbolic relevance',[222] or that the spread of dual citizenship is evidence of the nation-state's decline.[223] In contrast, others have predicted that dual citizenship would result in declining state power or territorial sovereignty.[224] Despite predictions that the state would become de-territorialised,[225] territory remains fundamental to the international political system. Although territorial sovereignty is unlikely to be affected by dual citizenship generally, the collective extraterritorial naturalisations may impact national sovereignty.[226] The role of citizenship and dual citizenship in territorial and national sovereignty is the focal point of this thesis. While territorial and national sovereignty are distinct from one another,

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[217] Christian Joppke, "Citizenship between De-and Re-Ethnicization," *European Journal of Sociology/Archives Européennes de Sociologie* 44, no. 3 (2003); Sejersen, "'I Vow to Thee My Countries"–the Expansion of Dual Citizenship in the 21st Century."
[218] Spiro states this position in order to offer his counter to the view that dual citizenship should be a human right. Spiro, "Dual Citizenship as Human Right."
[219] Thomas Faist, *Dual Citizenship in Europe: From Nationhood to Societal Integration* (Ashgate Publishing, Ltd., 2007).
[220] Frances Perraudin, "Iran: Lengthy Jail Terms for Dual National and British Council Worker," The Guardian.
[221] Ben Doherty, Kevin Rawlinson, and Patrick Wintour, "Three Australians, Two of Them Dual British Citizens, Held in Iran," The Guardian, https://www.theguardian.com/world/2019/sep/11/british-australian-women-detained-arrested-iran-tehran.
[222] Szabolcs Pogonyi, "Dual Citizenship and Sovereignty," *Nationalities Papers* 39, no. 5 (2011).
[223] Nancy Fraser, "Special Section: Transnational Public Sphere: Transnationalizing the Public Sphere: On the Legitimacy and Efficacy of Public Opinion in a Post-Westphalian World," *Theory, culture & society* 24, no. 4 (2007).; David Jacobson, *Rights across Borders: Immigration and the Decline of Citizenship* (Brill, 1996).; Yasemin Nuhoglu Soysal, *Limits of Citizenship: Migrants and Postnational Membership in Europe* (University of Chicago Press, 1994).
[224] Pogonyi, "Dual Citizenship and Sovereignty."
[225] Hartmut Behr, "Deterritorialisation and the Transformation of Statehood: The Paradox of Globalisation," *Geopolitics* 13, no. 2 (2008).
[226]Pogonyi, "Dual Citizenship and Sovereignty," 696.

there is an obvious overlap. Dual citizenship has created a situation whereby there can be overlapping allegiances at an individual level. This overlap might be insignificant at the individual level, however, when extraterritorial naturalisations are collective, the large-scale infringement of one state's national sovereignty over another's territorial sovereignty can become problematic for inter-state relations as it splits citizens allegiances between two states. Pogonyi argues that dual citizenship is 'used by states to increase their sovereignty, for example, promoting national interest abroad through expatriates and trans-border minorities.'[227]

> Concerns over territorial sovereignty are prevalent in case of trans-border minorities, especially in regions where ethnic proportions are the results of redrawn borders if large kin-minorities are present in states affected by the redrawing of boundaries (either as the result of the Paris Peace Treaties or the breakup of former federations), dual citizenship claims often stir heated diplomatic and political debates within and among the involved states.[228]

Some scholars and politicians interviewed for this thesis argue that recently naturalised citizens can act as hidden 'fifth column' acting on behalf of the naturalising state against their' home state'.[229] While Spiro suggests that the dual citizen can act as a foreign state's voice within another state,[230] some have also articulated fears that echo Walzer's belief that in order to respond to the existence of transborder kin communities, the 'most humane solution would be ... to move the borders.'[231] Whether these threats are realised or not, is not necessarily the point, but can affect the relationship between the two states,[232] particularly if

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[227] Ibid., 686.
[228] Ibid., 694.
[229] Maxim Tabachnik, "The "Fifth Column": Jus Soli and Geopolitics of Dual Citizenship," in *Citizenship, Territoriality, and Post-Soviet Nationhood* (Springer, 2019).
[230] Peter J Spiro, "Dual Citizenship, Birthright Citizenship, and the Meaning of Sovereignty. Hearing before the Subcommittee on Immigration, Border Security, and Claims of the Committee on the Judiciary, House of Representatives," (2006). Found in: Pogonyi, "Dual Citizenship and Sovereignty."
[231] Michael Walzer, "The New Tribalism: Notes on a Difficult Problem," *Dissent, Spring* (1992): 210.
[232]. More detailed examples of inter-state conflict arising from extraterritorial naturalisations will follow later; however, there are numerous. For a short description of these, please see: Pogonyi, "Dual Citizenship and Sovereignty."

politicians exaggerated the risk, these dual citizens would pose to the state.[233] The expedited process of collective naturalisations means that the extension of the nation and the state polity can occur almost instantaneously. It is conceivable that the states in which Russia and Hungary conducted extraterritorial naturalisations may feel threatened by the practices, as the recently expanded state polity of Hungary and Russia overlap into the territory of the 'home state'. Meaning that as a state consolidates legal ties over a group of people previously part of another state, it may seek to become the sovereign of the territory on which these people reside, as occurred in Crimea.

As will be argued later in this thesis, citizenship is being used to further Russian and Hungarian state power by creating complex overlaps of territorial sovereignty and state polities. The increasing global tolerance of dual citizenship and because of reluctance at the domestic level to either legislate against dual citizenship or to not enforce this legislation when it is present enables this foreign policy tactic or instrument. Should states adopt a stricter prohibition of dual citizenship, the consequences of extraterritorial naturalisations would likely decrease, as has been the case in Slovakia. However, as will be revealed later, state domestic legislation prohibiting dual citizenship does not eradicate the process but ensures that foreign extraterritorial naturalisation practices within the state become a clandestine process, as occurred in the Baltic states.

The principle of *droit de regard* has been particularly influential in the logic and rhetoric surrounding Russia and Hungary's extraterritorial naturalisations. Citizens of another state are naturalised because it remains the naturalising state's prerogative to do so, then the naturalising state subsequently demands an inspection into the affairs of the 'home state' regarding the treatment of this recently naturalised population; indirectly this is manifested by Hungary and Russia's funding of NGOs who responsible for protecting the interests of their

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[233] T Alexander Aleinikoff and Douglas Klusmeyer, "Plural Nationality: Facing the Future in a Migratory World," *Citizenship today: Global perspectives and practices* (2001).

citizens within the 'home states'. These NGOs actively lobby the 'home states' for the protection of their citizens' interests.[234] More directly, state officials from Russia and Hungary have protested to international and supranational bodies, as well as directly to the state in which their recently naturalised citizens reside; for instance, the Hungarian government regularly complains to international bodies and the states in which their recently naturalised citizens reside, about the treatment of these Hungarians.[235] In the most extreme form of this demand for inspection about the treatment of naturalised citizens, the Russian Federation justified the military interventions in Georgia and Ukraine as a means to protect their citizens from mistreatment.[236] As will be highlighted throughout this thesis, this circular logic surrounding the tactical use of the *droit de regard* is a common feature of Russian and Hungarian official rhetoric. Russia has been particularly inconsistent in the application of this right; on the one hand, the Russian Federation has been a primary advocate of non-intervention in state sovereign affairs, while simultaneously engaging in violations of state sovereignty, including the annexation of Crimea and extraterritorial naturalisation policies elsewhere in the former Soviet republics.

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[234] Mikhail Suslov, "Geopolitization of the Post-Soviet Diaspora in the Baltic Sea Region," *Global Affairs* 4, no. 4-5 (2018).; Szabolcs Pogonyi, *Extra-Territorial Ethnic Politics, Discourses and Identities in Hungary* (Springer, 2017).

[235] Hungary has initiated diplomatic altercations with Serbia, Slovakia, Romania and Ukraine about the treatment of the Hungarian citizens within these states: *Extra-Territorial Ethnic Politics, Discourses and Identities in Hungary*. They have previously appealed to the OSCE Secretary-General, the OSCE High Commissioner on National Minorities and the OSCE Chairman-in-Office, the UN high commissioner for human rights and the EU commissioner for enlargement and European neighbourhood policy about Ukraine's language laws: Radio Liberty, "Hungary Appeals to OSCE, UN and EU over Language Article of Ukrainian Law on Education," Radio Liberty, https://www.radiosvoboda.org/a/news/28729757.html.

[236] For instance, see The Kremlin, "Address by President of the Russian Federation on 18 March," ed. President of Russia (The Kremlin, Moscow: The Russian Federation, 2014).

Conceptualising strategy

Within the argument that the extraterritorial naturalisations conducted by Russia and Hungary are part of foreign policy objectives, lies a term which is seldom defined – strategy. Political leaders have used the term since as early as the Roman Empire.[237] The word 'strategy' is ubiquitous in a plethora of fields and contexts, yet there is no consensus on its precise boundaries and limits.[238] This section's objective is not an attempt to redefine the term or offer a novel interpretation. However, it is an effort to conceptualise the term to enable recognition of the use of strategy, thus providing terminological clarity within this thesis. In other words, what is strategy, and how can we know we are looking at it when we see it? The term's scope is enormous, but It was not until the start of the nineteenth century that the term came into general use.[239] Freedman argues, 'the speed with which the word strategy gained currency meant that it came to be used without a generally agreed-upon definition.'[240] Although the term is ubiquitous, the origins of the word are exact. The etymology of the term points us to its military connotation, and it was within this realm where the term was first used; via Latin from Greek *stratēgēma*, from *stratēgein* 'be a general', and *stratēgos*, from *stratos* 'army' + *agein* 'to lead'. Lawrence stresses the significance of strategy when arguing that 'strategy is *the* central political art. It is about getting more out of a situation than the starting balance of power would suggest.'[241] Freedman, when summarising a considerable range of scholarly works from a variety of fields, suggests that strategy can be any or a combination of the following:

> The interaction of ends, ways and means, combinations of long-term goals and courses of action, systems of expediencies and forms of domination, dialectics of opposing wills

[237] Edward Luttwak, *The Grand Strategy of the Roman Empire: From the First Century CE to the Third* (John Hopkins University Press, 2016).
[238] Lawrence Freedman, *Strategy: A History* (Oxford University Press, 2015), xi.
[239] Ibid., 72.
[240] Ibid., 74.
[241] Ibid., xii. Emphasis my own.

> and interdependent decision-making, relationships to environments, advanced problem-solving, and a means of coping with uncertainty.[242]

He suggests that 'having a strategy suggests an ability to look up from the short term and the trivial to view the long term and the essential',[243] and that strategy is an exercise in 'maintaining a balance between ends, ways, and means; about identifying objectives; and about the resources and methods available for meeting such objectives.'[244] It is important to note that the strategy differs fundamentally from tactics or a plan. Of course, planning is a part of formulating strategy but, as Freedman suggests, a necessary condition of strategy is that of an 'actual or potential conflict, when interests collide, and forms of resolution are required.'[245] He argues that 'a plan supposes a sequence of events that allows one to move with confidence from one state of affairs to another. Strategy is required when others might frustrate one's plans because they have different and possibly opposing interests and concerns.'[246] In other words, the presence of an adversary is a necessary condition for the formulation of strategy. Strategy also deviates from planning as the former involves 'thoroughness and holistic thinking.'[247] Freedman points to structural conditions when arguing that, 'what turns something that is not quite strategy into strategy is a sense of actual or imminent instability, a changing context that induces a sense of conflict.'[248]

When looking at state behaviour within the international political system, strategy is formed:

> At the highest level of policy, taking in not just a clash of arms but all possible elements of power. Strategy appeared as the principal function of the state, requiring choices between different forms of power and their coordinated employment to ensure that their

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[242] Ibid., 607.
[243] Ibid., ix.
[244] Ibid., xi.
[245] Ibid.
[246] Ibid.
[247] Harry R Yarger, *Strategic Theory for the 21st Century: The Little Book on Big Strategy* (Diane Publishing, 2006).
[248] Freedman, *Strategy: A History*, 611.

> effects were maximised. Success could be achieved by means other than physical force.[249]

Despite Freedman's book on the history of strategy numbering seven hundred pages, his definition consists of just five words, incorporating another contested concept into the definition often absent from conventional notions; he defines strategy as 'the art of creating power'.[250]

There are some difficulties in evaluating strategy when it emanates from the state as part of their foreign policy, as deception is 'a vital strategic quality';[251] this is particularly so as a strategy within foreign policies can involve an 'indirect approach'.[252] As Freedman argues, 'the greatest power is that which achieves its effects without notice.'[253] However, for the researcher, this can create difficulties in attempting to correctly interpret strategic foreign policy given the possibility for a 'discrepancy between the stated goal and the goal pursued.'[254] A key feature of strategy is the importance of 'language and communication',[255] and without them, strategy is meaningless;[256] this means that both language and (mis)communication can be critical strategic features of foreign policy. Therefore, discourse analysis alone will not be sufficient to determine a state's strategic goals[257] for the following reasons: first, 'in order to preserve their international reputation and legitimacy, it may be in states' interest to mask their pursuit of relative gains by mentioning the pursuit of absolute gain';[258] second, a state may wish to 'reduce the scope of a stated foreign policy goal in order to increase the likelihood of success';[259] third, policymakers may evade questions regarding

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[249] Ibid., 193.
[250] Ibid., xii.
[251] Ibid., 5.
[252] Basil Liddell Hart, "Strategy: The Indirect Approach," in *Strategic Studies* (Routledge, 2008).
[253] Freedman, *Strategy: A History*, 615.
[254] Nicholas Onuf, "Speaking of Policy," *Foreign Policy in a Constructed World* 4 (2001).
[255] Freedman, *Strategy: A History*, 614.
[256] Ibid.
[257] Jean-Frédéric Morin and Jonathan Paquin, *Foreign Policy Analysis: A Toolbox* (Springer, 2018), 21.
[258] Ibid., 20.
[259] Ibid.

their foreign policy because it is in their national interest to do so, 'allowing them to depoliticise foreign policy and generate some legitimacy.'[260]

From the discussion above, it could be said that is an example of a strategy if it: 1) is a top-down initiated holistic plan; 2) is long term in nature; 3) operates with a definable adversary or adversaries; and 4) involves an attempt to generate power. The four components of strategy might reveal the presence of strategy but does not help in detailing the type of strategy being pursued with any given policy. Regarding the extraterritorial naturalisation practices, it provides analytical import to suggest there is a form of strategic intent by the states conducting the practice. However, it is more useful to detail the variance in strategic intent once established that strategy is indeed present. In other words, how can strategy as a concept be operationalised when looking at the extraterritorial naturalisation practices, and how is it manifested? The aforementioned definitional considerations regarding strategy show what elements must be present to argue that what we are seeing is strategic.

The first two of these four components are relatively straightforward to address. First, the extraterritorial naturalisations conducted by Russia and Hungary are most definitively top-down; the policy of conducting naturalisations at the scale by which Russia and Hungary have done so, involve significant undertakings and resources. Both Russia and Hungary have dedicated significant proportions of their annual budgets towards the practice, which involve multiple government bodies and bureaucratic infrastructure.[261]

Second, it is clear that extraterritorial naturalisations are long-term in nature. This component of strategy is related to the previous point, as the naturalising state builds the

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[260] Ibid., 23.

[261] The Rossotrudnichestvo Agency, or the Federal Agency for Commonwealth of Independent States Affairs, Compatriots Living Abroad, and International Humanitarian Cooperation has an annual budget of 9.5 billion rubbles as of 2020. Grigas, *Beyond Crimea: The New Russian Empire*, 38. In Transylvania alone, between 2010 and 2015 the Hungarian government channelled four billion forints (approximately £10,000,000) through the Hungarian ethnic political party, Hungarian People's Party of Transylvania, to facilitate processing naturalisation applications. Pogonyi, *Extra-Territorial Ethnic Politics, Discourses and Identities in Hungary*, 106. For context, the total foreign direct investment in Romania from Hungary is around £1 billion. National Bank of Romania, "Foreign Direct Investment in Romania," (2018).

governmental infrastructure to organise and legislate for the extraterritorial naturalisations, they do so as a long-term plan. Moreover, as the naturalisations involve incorporating a large number of persons into the state polity with significant implications that shape the dynamics of the state that last for generations; the naturalising state, therefore takes the onus in establishing and consolidating responsibility for those naturalised, a long-term and significant undertaking.

Third, the extraterritorial naturalisations conducted by Hungary and Russia can be said to operate with an observable adversary. This element of determining whether or not the policy is strategic or not can be satisfied by observing state protestation at the practice. Furthermore, it is with this point that the type of strategy becomes relevant, as the adversary might be a direct opponent, which in this case, is the state in which the extraterritorial naturalisations are being conducted who have protested against the practice in diplomatic discussions or to relevant international bodies. While these might indeed be examples of direct adversaries, other potential indirect adversaries might be involved. State rivalries do not happen within a vacuum, as within each rivalry and alliance is a network of state relationships.[262] Therefore, a rivalry between two states has an effect that stretches beyond those two states and affects dynamics at the regional and international levels. The regional level includes contiguous states affected by alterations in their neighbouring states' relationships with other states, either positively or negatively. Internationally, while this is also true, there are other considerations, such as alliances or rivalries, that involve key agents within the international political system.

Fourth, and the most complex element of strategy is the attempt to generate power. Power is notoriously tricky to define and is inherently multifaceted.[263] We can take power as the ability or capacity to influence others to make decisions that favour those with power.

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[262] Zeev Maoz et al., "International Relations: A Network Approach," *New directions for international relations: confronting the method-of-analysis problem* (2005).
[263] Joseph S Nye, "Power and Foreign Policy," *Journal of Political Power* 4, no. 1 (2011).

Regarding the power that the naturalising states can generate, this can occur at two levels discussed previously, as well as the domestic. The diagram in Figure 2 on page 7 illustrates how the extraterritorial naturalisations conducted by Russia and Hungary have resulted in diverse but interrelated specific strategic gains with reinforcement and feedback effects occurring between some of the gains that ultimately result in international and domestic power gains.

Domestic power generation occurs when the naturalising state's extraterritorial naturalisation practices subsequently alter domestic political dynamics and networks that benefit those conducting naturalisation. The manifestations of this are as follows: extraterritorial naturalisations can result in favourable increases in domestic public perception, and a show of political strength vis-à-vis rivals, or other domestic political agents. The naturalisations can address a demographic decline by increasing co-ethnic or co-cultural immigration to the naturalising state, therefore increasing tax revenues and economic benefits. In some cases, the practice might also increase the raw voter numbers as the number of eligible voters increases and increases the number voters who are likely to be loyal to the government conducting naturalisations given the benefits conferred upon these individuals through the naturalisation process. The practice can also facilitate ethnic political party partner relationship building in the 'home states' which in turn can assist in generating support and votes for the naturalising state as well as generating economic benefit; this is done through the creation of economic intermediaries' networks, which the naturalising state can utilise for investments in the territory on which the recently naturalised reside.

At the international level, power generation attempts might include efforts to destabilise contiguous rivals, thus increasing the naturalising state's relative power vis-à-vis these regional rivals. Further destabilisation attempts might occur through 'freezing' conflicts, thereby blocking their alliance-building attempts with the naturalising states political adversaries. The extraterritorial naturalisations may be interpreted as a projection of state

capabilities and strength both through the exercising of complex state policy and by increasing the citizenry population of the naturalising state. The naturalisations also reinforce 'fifth column' capabilities, which can destabilise the political adversaries. Perhaps the most extreme consequence of the extraterritorial naturalisation in some, but not all cases, is irredentism.

It is essential to mention that while these might be strategic goals, goals are not always met. It is also conceivable that two potentially conflicting goals are being pursued, increasing immigration to the naturalising state and gaining extraterritorial influence or control through the recently naturalised population. States may pursue parallel goals to opportunistically utilise one of these after weighing up the consequences and potential gains. Based on this logic, the naturalising state may be said to be collecting bargaining chips through the extraterritorial naturalisations. Some, if not all, of these strategic power gains, have a destabilising effect on the state in which the naturalisations are conducted and the international political system.

Conclusion

It remains the state's prerogative to legislate on the boundaries of who might be considered to be a member of the political unit, and therefore who might not be considered part of the state in a legal sense. However, the use of this privilege is not always interpreted as unthreatening, as states construct legal bonds with populations in other territories, creating overlapping claims to populations. Dual citizenship as a phenomenon is increasingly tolerated globally, and at the individual level, barring a few exceptions, this does not appear to be a concern for many states. However, if it is not an individual being naturalised and receiving additional legal citizenship, but a collective, this can create tensions, frictions, and cause conflicts. Given the potential for the disruptive impact on domestic politics and inter-state relations,

extraterritorial naturalisation policies could be utilised as a part of a strategy. These power gains at the two levels, whether intangible or tangible, have an overarching effect of destabilisation. The strategic elements and impacts extraterritorial naturalisation that will be the predominant focus of this.

The following chapter will put Russia and Hungary's extraterritorial naturalisations in a historical context by looking at global trends and changes to the international political system that has enabled or facilitated the practice.

Chapter 2: Extraterritorial Naturalisations in Historical Context

This chapter contextualises the evolution of extraterritorial naturalisation policies by looking at the development of the relevant historical trends relevant, the structural conditions that have enabled the evolution of the practice. In doing so, this chapter attempts to show how and why the changing international and domestic conditions have affected the complexion of Russian and Hungarian extraterritorial naturalisations.

The Commonwealth of Independent States, statelessness, and conflict

Russian extraterritorial naturalisations have occurred almost exclusively within Russia's sphere of influence. This sphere of influence has been formed from a historical context. The collapse of the Soviet Union in 1991 resulted in the creation of fifteen independent states. Immediately before the Union's disintegration on 9 December 1991, three of these states: Russia, Belarus, and Ukraine, signed the 'Agreement Establishing the Commonwealth of Independent States (CIS)', otherwise known as 'Creation Agreement'. On 22 January 1993, the CIS declarations were signed in Minsk, detailing the institutional functions and roles of the Commonwealth.[264] In October 1993, Georgia joined the CIS in a *quid pro quo* arrangement for Russian support in dealing with a rebellion in Mingrelia who supported the previous president Zviad Gamsakhurdia.[265]

The member states formed the CIS to manage the divorce of the breakup of the Soviet Union. Initially, the Russian Federation had little interest in the fellow CIS member states, viewing them as an obstacle on Russia's path towards a Western state. Accordingly the term

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[264] Anatoly Michailovich Khazanov, *After the USSR: Ethnicity, Nationalism and Politics in the Commonwealth of Independent States* (University of Wisconsin Press, 1995).
[265] Barry Turner, "Georgia," in *The Statesman's Yearbook: The Politics, Cultures and Economies of the World 2004*, ed. Barry Turner (London: Palgrave Macmillan UK, 2003).

'near abroad' emerged as a trade term shortly after the creation of the CIS, not so much as to create a Russian 'sphere of influence' but as a way to manage negative externalities emanating from their neighbouring countries. The story of CIS membership is convoluted; following the creation of the CIS, most of the newly independent states at various times joined, and some then left the treaty. The notable former Soviet states who were always absent from the CIS are the Baltic States of Estonia, Latvia, and Lithuania, as all of these states considered the Soviet Union to be an illegal occupier of their respective sovereign territories.[266]

Immediately following the collapse of the Soviet Union, the newly independent former Soviet republics had to quickly address a plethora of issues within their territorial borders as they implemented constitutions. One such issue was the issuance of citizenship. For the majority of people in the majority of these newly independent republics, this was straightforward. However, in a few post-Soviet states, citizenship became a highly contentious issue, as the governments had to formally decide whom to confer citizenship upon and set the requirements for membership. The Baltic states of Estonia, Latvia, and Lithuania had a complex dynamic resulting from migration patterns during the Soviet Union.[267] Factories, power plants, communication centres, and refineries were constructed all across the vast territory of the Union, including the Baltic States, with workers sent to work in these locales from all over the territory of the Union of Soviet Socialist Republics (USSR).[268] Workers often had little choice in the location of their employment. Following graduation from educational institutions, graduates could be sent anywhere within the territory of the Soviet Union, including the Baltic States. The consequence of this was that, on the day that

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[266] Lauri Mälksoo, *Illegal Annexation and State Continuity: The Case of the Incorporation of the Baltic States by the USSR* (Brill Nijhoff, 2003).
[267] Rogers Brubaker, "Citizenship Struggles in Soviet Successor States," *International migration review* 26, no. 2 (1992).
[268] Zhanna A Zaionchkovskaya, "Migration Patterns in the Former Soviet Union," *Cooperation and Conflict in the Former Soviet Union: Implications for Migration* (1996).

Estonia, Latvia, and Lithuania (re)established independence, a substantial percentage of their population were immigrants from various parts of the Soviet Union.[269] Presently, each of the Baltic states labels the Soviet authorities as illegal occupiers of their territories,[270] and therefore upon the implementation of their constitutions, did not uniformly provide citizenship to all residing within their territories. Lithuania was the only Baltic state to do so, granting citizenship to 'native' Lithuanians and those who moved to the republic during Soviet times.[271] Estonia and Latvia instead decided to offer citizenship only to those who could prove they or their ancestors resided in the territories before the occupation of the Soviet Union in the 1940s, or who had sufficient knowledge of Estonian or Latvian languages respectively. In essence, proof of assimilation, therefore, became the salient characteristic of these states' citizenship policies.[272] Those who were not offered, or who rejected citizenship, were instead granted 'undefined' or 'non-citizenship' status and were provided with a 'grey passport' that did not denote citizenship, nor many of the benefits that citizenship provides, but allowed for international movement as per other international passports.[273] The vast majority of these 'non-citizens' or people with 'undefined citizenship' statuses are ethnically Russian, who had moved from other parts of the Soviet Union to work, primarily in the industrial zones.[274] The decision to implement this additional 'non-citizen' status has shaped the domestic political dynamics within Estonia and Latvia, as well as Russian extraterritorial naturalisations and the inter-state relations between Russia and Estonia and Russia and Latvia.

Since the beginning of the breakup of the Soviet Union, Moldova, and the South Caucus states of Georgia, Armenia and Azerbaijan had separatist movements within their

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[269] Pål Kolstø and Andrei Edemsky, *Russians in the Former Soviet Republics* (Indiana University Press, 1995).
[270] Mälksoo, *Illegal Annexation and State Continuity: The Case of the Incorporation of the Baltic States by the USSR*.
[271] Graham Smith, Aadne Aasland, and Richard Mole, "Statehood, Ethnic Relations and Citizenship," in *The Baltic States* (Springer, 1996).
[272] Ibid.
[273] Ibid.
[274] Rasa Baločkaitė, "Post-Soviet Transitions of the Planned Socialist Towns: Visaginas, Lithuania," *Studies of Transition States and Societies* 2, no. 2 (2010).

territories. Transnistria, a region in Moldova to the east of the Dniester River bordering Ukraine, had independence aspirations. In Georgia, Abkhazia, a region on the Black Sea near the Russian border and city of Sochi and South Ossetia, south of the Caucasus mountains, also sought secession from their legal sovereign. At the same time, Armenia and Azerbaijan had continuing conflict over Nagorno-Karabakh. For Georgia, these separatist movements caused complex citizenship issues to deal with upon its independence, albeit for different reasons. Even before the dissolution of the Soviet Union, the regions of South Ossetia and Abkhazia had tried to secede from the Georgian Soviet's authority.[275] When Georgia become a sovereign independent state, many within these breakaway territories rejected the offer of Georgian citizenship, leaving a large percentage of the population of these territories stateless.[276] Those who rejected the Georgian offer of citizenship continued using their Soviet passports as their primary form of documentation.[277] The situation in Transnistria was somewhat similar to that in Georgia. Following the collapse of the Soviet Union and Moldovan independence, the Moldovan authorities were unable to convince the entire Transnistrian population to accept Moldovan citizenship, leaving the majority stateless.[278]

Statelessness is a crucial feature of Russian extraterritorial naturalisations practices and has influenced processes, intent, and rhetoric. The sudden change of sovereign authorities and territorial borders following the collapse of the Soviet Union meant that each state was faced with a dilemma with regards to population, as some states suddenly had to decide how to treat a segment of a population that did not form a part of the make-up of the state's majority. Likewise, in some of the situations listed above, a population was precipitously under the regime's authority deemed illegitimate.

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[275] Céline Francis, *Conflict Resolution and Status: The Case of Georgia and Abkhazia (1989-2008)* (ASP/VUBPRESS/UPA, 2011).
[276] Scott Littlefield, "Citizenship, Identity and Foreign Policy: The Contradictions and Consequences of Russia's Passport Distribution in the Separatist Regions of Georgia," *Europe-Asia Studies* 61, no. 8 (2009).
[277] Andrea Weiss, "Crossing Conflicting State Boundaries: The Georgian-Abkhazian Ceasefire Line," in *Subverting Borders* (Springer, 2012).
[278] Toru Nagashima, "Russia's Passportization Policy toward Unrecognized Republics: Abkhazia, South Ossetia, and Transnistria," *Problems of Post-Communism* 66, no. 3 (2019).

As a regional hegemon and *de facto* leader of the CIS, the Russian Federation to manage conflict within these regions posted peacekeeping forces in Abkhazia and South Ossetia to avoid an escalation of the conflict. Russian peacekeeping forces were also posted in Transnistria. However, there have been notable failures of the institution to convert treaty signatures into the realisation of objectives, highlighted by military involvement by the Russian Federation within the Commonwealth's member states.[279] In 2008 the Russian Federation began large scale military interventions in the breakaway states of Abkhazia and South Ossetia, thus beginning the Russo-Georgian war; this led Georgia to withdraw its membership from the CIS in 2009.

The Russian Federation's military has had a presence in the form of the Russian Navy at the Black Sea port of Sevastopol in Crimea since 1772. Accordingly, Sevastopol held an autonomous status within Ukraine following the dissolution of the Soviet Union and meant that large numbers of the Russian military were posted on the peninsula. In 2018, Ukraine officially withdrew their membership from the CIS due to the Russian Federation's annexation of Crimea in 2014 and ongoing intervention in Eastern Ukraine.[280]

The relationship between Russia and the other CIS members have shaped Russian extraterritorial naturalisation practices, particularly given the Russian Federation's concerns over 'Western' encroachment into their traditional sphere of influence, via supranational bodies such as the North Atlantic Treaty Organisation (NATO) and the EU. This fear over loss of Russian influence, both globally and regionally, determines many Russian foreign policy decisions.[281]

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[279] Paul Kubicek, "The Commonwealth of Independent States: An Example of Failed Regionalism?," *Review of International Studies* 35, no. S1 (2009).
[280] Nicholas Waller, "Poroshenko Officially Ends Ukraine's Membership in CIS," New Europe, https://www.neweurope.eu/article/poroshenko-officially-ends-ukraines-membership-cis/.
[281] Natalia Morozova, "Geopolitics, Eurasianism and Russian Foreign Policy under Putin," *Geopolitics* 14, no. 4 (2009).

Extraterritorial naturalisations in the late twentieth century

By the end of the twentieth century, most states developed some form of diaspora engagement policies, ranging significantly in scale.[282] Extraterritorial naturalisation practices might be considered one of the most intensive of these, yet even within extraterritorial naturalisation policies, there is considerable variation in scope and intensity. It can be argued that states that conduct case-by-case naturalisations based on ancestry, residence or place of birth are engaging in extraterritorial naturalisation at an individual level. As this thesis will demonstrate, however, naturalisations conducted at an individual level differ considerably regarding the impact on inter-state relations than they do at the collective level. Most of these transpire without hindrance or protestation, primarily because naturalisations are conducted within the naturalising states' territory. However, the universe of extraterritorial naturalisation cases significantly narrows when considering those conducted at a state-initiated collective level; the German, Italian, and Irish instances of extraterritorial naturalisation fall within this category.

In the 1990s, under Berlusconi, descendants of Italian migrants to Latin America were given a chance to apply for Italian citizenship and were given Italian official documentation.[283] The number of eligible individuals was substantial. Between 1880 and 1920, during Argentina's economic and manufacturing boom, approximately 2 million Italian emigrants moved to Argentina alone, with significant emigration to Brazil and Uruguay.[284] When applying for Italian citizenship, it was sufficient to prove that their ancestors never formally renounced Italian nationality voluntarily to an Italian official. Therefore even fourth

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[282] For a thorough typology of diaspora engagement policies and the state's which implement them, see Gamlen, "Diaspora Engagement Policies: What Are They, and What Kinds of States Use Them? In Working Paper 06-32."
[283] Guido Tintori, "More Than One Million Individuals Got Italian Citizenship Abroad in Twelve Years (1998–2010)," *EUDO Citizenship News* 21 (2012).
[284] Samuel L Baily, *Immigrants in the Lands of Promise: Italians in Buenos Aires and New York City, 1870-1914* (Cornell University Press, 1999), 54.

or fifth generation Italian descendants were considered eligible in line with the principles of *ius sanguinis*, a policy introduced through citizenship legislation changes in the mid-1990s by Berlusconi's nationalist political party, Forza Italia.[285] The programme's extent was substantial; over 1 million Italian passports were issued to Italian descendants in Latin America by the Italian authorities in twelve years between 1998-2010.[286]

The Irish diaspora makes up another significant group which have benefitted from extraterritorial naturalisation policies at a collective level. Irish emigration has a thorough and lengthy history. Arguably beginning in the Middle Ages,[287] but indubitably, as early as 1700, Irish emigration abroad has been a persistent feature of Irish politics to this day.[288] The Irish diaspora is one of the most numerous globally, with an estimated 80 million self-reporting as having some form of Irish descent.[289] Indeed, the numbers are so large that there is a ministerial position governing these groups - the Republic of Ireland's Minister of State for the Diaspora. The number of Irish citizens is substantially lower than this, primarily because Irish legislation effectively terminates the legal right to Irish citizenship at the third generation, in contrast to the Italian legal relationship with the descendants of Italian ancestry, which is, in theory, indefinite in length.[290] The process for naturalisation is relatively straightforward but involves registration, by the parents of an individual, at a Foreign Births Register.[291] The ease of this process, coupled with extraterritorial naturalisations' permissibility, has resulted in large-scale naturalisations of Irish descendants living abroad.[292]

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[285] Guido Tintori, "The Transnational Political Practices of "Latin American Italians"," *International Migration* 49, no. 3 (2011).
[286] "More Than One Million Individuals Got Italian Citizenship Abroad in Twelve Years (1998–2010)."
[287] Roy Flechner and Sven Meeder, *The Irish in Early Medieval Europe: Identity, Culture and Religion* (Macmillan International Higher Education, 2016), 231-41.
[288] Andy Bielenberg, *The Irish Diaspora* (Routledge, 2014).
[289] For a comprehensive history and analysis of the Irish diaspora see ibid.
[290] The Good Friday agreement and the political complexities of Northern Ireland confound the Irish case.
[291] See Mary E Daly, "Irish Nationality and Citizenship since 1922," *Irish historical studies* 32, no. 127 (2001).; Síofra O'Leary, "Irish Nationality Law," *Nationality laws in the European Union. Le droit de la nationalité dans l'Union Européenne* (1996).
[292] Allowing individuals born in Northern Ireland to claim Irish citizenship (or British, or both), and as well as their descendants.

The claiming of foreign citizenry based on ethnicity or ancestry has been a feature of German politics and, in many regards, is linked to the territorial changes that occurred with the loss of the German Empire and the Second World War. The German state's relationship with the *Aussiedler* and *Spätaussiedler* or repatriates or 'resettlers' is complex.[293] In a legal sense, the German nationals, the population who are entitled to German citizenship are bonded to the German state by the German right of return. For these populations, eligibility for German citizenship is predicated on two underlying principles: *ius sanguinis*, but perhaps more importantly, their status as displaced persons from the territories of the former German empire. Citizenship acquisition is possible for those who had 'been admitted to the territory of the German Reich within the boundaries of 31 December 1937, as a refugee or expellee of German ethnic origin or as the spouse or descendant of such person'.[294] The majority of the eligible individuals resided in the territories that formed Prussia. However, because of Germany's ethnic formulation of the nation, others resided as far east as Kazakhstan, as descendants of the German nation.[295] The fallout of the Second World War has also shaped German citizenship politics within Europe, as the ethnic Germans of East Prussia and Kaliningrad were expelled by Stalin, many of whom are now eligible for German citizenship.[296]

The Russian extraterritorial naturalisation practices conducted within the Georgian states of Abkhazia and South Ossetia between 2002 and 2008 by the Russian Federation,[297] and within Donetsk and Luhansk in Ukraine since 2014,[298] are perhaps the most infamous

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[293] Marianne Takle, "(Spät) Aussiedler: From Germans to Immigrants," *Nationalism and Ethnic Politics* 17, no. 2 (2011).
[294] Claire Sutherland and Elena Barabantseva, *Diaspora and Citizenship* (Routledge, 2013), 102.
[295] Andrew J Brown, "The Germans of Germany and the Germans of Kazakhstan: A Eurasian Volk in the Twilight of Diaspora," *Europe-Asia Studies* 57, no. 4 (2005).
[296] Dieter Gosewinkel, "Citizenship and Naturalization Politics in Germany in the Nineteenth and Twentieth Centuries," *Challenging Ethnic Citizenship: German and Israeli Perspectives on Immigration* (2002).
[297] Florian Mühlfried, "Citizenship at War: Passports and Nationality in the 2008 Russian-Georgian Conflict," *Anthropology Today* 26, no. 2 (2010).
[298] BBC News, "Ukraine Rebels Seek to Join Russia," BBC News, https://www.bbc.com/news/world-europe-27369980.

examples of the practice. Both the Georgian and Ukrainian states protested significantly at these practices and were an important part of the conflict.[299] As will be elaborated later in this thesis, there are variations within the Russian forms of extraterritorial naturalisations with regards to processes, locations, scale, and speed; however, these state contestations distinguish the Russian extraterritorial naturalisation practices, from, for instance, the Irish or Italian cases, neither of which was contested by the states in which they were enacted.

These extraterritorial naturalisation policies in practice were preceded by changes in the Russian citizenship legislation that changed the pre-requisite requirements for Russian citizenship acquisition, thereby permitting extraterritorial naturalisations on a large scale.[300] In practice, for the Abkhaz, South Ossetian and, later, the Ukrainian population in Donbas, who received the Russian passport documentation, this naturalisation procedure was simplified, expedited, and incentivised.[301] Likewise, within Crimea before the Russian Federation's annexation in 2014, some segments of the Crimean population had received Russian passport documentation from consulates and embassies within the Ukrainian territory.[302] Russian extraterritorial naturalisation practices have evolved and been implemented in the Baltic states of Estonia and Latvia. The puzzle emanating from this brief history of Russian extraterritorial naturalisation relates to why some populations have been naturalised and others not. Some commentators have argued that Russian extraterritorial naturalisation policies are a manifestation of a form of ethnic nationalism.[303] However, given that there appears to be no

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[299] Vincent M Artman, "" Passport Politics": Passportization and Territoriality in the De Facto States of Georgia" (University of Oregon, 2011). Nagashima, "Russia's Passportization Policy toward Unrecognized Republics: Abkhazia, South Ossetia, and Transnistria."
[300] Wrighton, "Authoritarian Regime Stabilization through Legitimation, Popular Co-Optation, and Exclusion: Russian Pasportizatsiya Strategies in Crimea."
[301] Ibid.
[302] Grigas, *Beyond Crimea: The New Russian Empire*.
[303] See, for example, Pål Kolstø, "The Ethnification of Russian Nationalism," in *The New Russian Nationalism - Imperialism, Ethnicity and Authoritarianism 2000 - 2015*, ed. Pål Kolstø and Helge Blakkisrud (Edinburgh University Press 2016).

intent to naturalise the substantial ethnic and cultural Russian population of Kazakhstan (approximately 19.8 per cent)[304] for instance, this does not hold.

The post-communist period's structural conditions mean that national borders consolidated and relationships with 'their' populations were (re)defined. Accordingly, each post-communist state has formulated domestic citizenship legislation differently. Some states in central and Eastern Europe developed extraterritorial naturalisations policies to (re)incorporate the population into the state in light of these structural and systemic changes to the international political order. Some states that had multiple nations within them, such as Slovakia and the Czech Republic,[305] began to actively engage with 'their' diaspora or kin in the contiguous states during the early twenty-first century. For Slovakia, this relationship was defined explicitly along ethnic lines when Slovakian citizenship was offered to ethnic Slovakians only. Likewise, the Czech Republic developed a similar naturalisation programme to legally incorporate ethnic Czechs into the state polity.[306] However, the most notable and significant instance of extraterritorial naturalisation policies between the naturalising state and the 'home state' is conducted by the Hungarian state.[307]

Hungarian policymakers do not define the Hungarian version of extraterritorial naturalisation as such. However, the process remains fundamentally similar to Russian policies whereby populations are naturalised extraterritorially. Although the Hungarian state's extraterritorial naturalisation is a contemporary phenomenon, the geography of the peoples connected to the Hungarian state dates back centuries and is historically convoluted.[308] It is beyond this chapter's scope to detail the geographical origins of the Hungarian population; however, the contemporary practice is undeniably contingent on history, and therefore some

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[304] Joanna Lillis, *Dark Shadows: Inside the Secret World of Kazakhstan* (Bloomsbury Publishing, 2018).
[305] Officially now known as Czechia.
[306] Rainer Bauböck, Bernhard Perchinig, and Wiebke Sievers, *Citizenship Policies in the New Europe* (Amsterdam University Press, 2009).
[307] Pogonyi, *Extra-Territorial Ethnic Politics, Discourses and Identities in Hungary*.
[308] Zoltan Kovacs, "Border Changes and Their Effect on the Structure of Hungarian Society," *Political Geography Quarterly* 8, no. 1 (1989).

context is needed. Specifically, the critical juncture of the Treaty of Trianon and the consequent border revisions is crucial to any history of Hungarian extraterritorial naturalisation in the twenty-first century,[309] as shown in Figure 6 below.



Figure 6. Map showing the dissolution of the Austro-Hungarian Empire and changes resulting from the Treaty of Trianon[310]

The former Kingdom of Hungary, part of the Austro-Hungarian Empire, lost 72 per cent of its territory due to the treaties signed at the end of the First World War.[311] This territorial change occurred following a peace agreement, known as the Treaty of Trianon signed in 1920 in a namesake palace of Versailles.[312] Coming into force on the 31 July 1921, this treaty formalised the state boundaries of independent Hungary. However, while the Treaty of Trianon consolidated the state frontiers, the Hungarian nation's boundaries arguably align better with the former Kingdom of Hungary.[313] This discrepancy between the historical

[309] Peter F Sugar, *A History of Hungary* (Indiana University Press, 1994).
[310] 'Map of the territorial changes resulting from the dissolution the Austria-Hungarian empire and the Treaty of Trianon, Sutori, "Austria-Hungary Split, September 1919.," https://www.sutori.com/item/untitled-18a0-7362.
[311] See Figure 6
[312] Carlile Aylmer Macartney, *Hungary and Her Successors: The Treaty of Trianon and Its Consequences 1919-1937* (Oxford University Press, 1937).
[313] Steven Béla Várdy, "The Impact of Trianon Upon Hungary and the Hungarian Mind: The Nature of Interwar Hungarian Irredentism," *Hungarian Studies Review* 10, no. 1 (1983).

and contemporary territories is particularly relevant for the ethnic Hungarian community, many of whom reside still beyond the state's sovereign borders. The ethnic Hungarians abroad, as the Hungarian state refers to them, are numerous. Approximately 3 million people were, as David Laitin would put it, 'beached'[314] by the border revisions enforced by Allied nations, a punishment for the Kingdom of Hungary's decision to ally with Germany during the First World War. The Treaty of Trianon continues to be a salient issue for Hungarian international and domestic politics and Hungary's geographical neighbours.[315] Likewise, for the ethnic Hungarian minorities in the resulting independent states surrounding Hungary: Austria, Croatia, Romania, Serbia, Slovakia, Slovenia and Ukraine, the Treaty of Trianon is contentious and has significantly impacted the lives of these populations. Until recently, this large proportion of the national population has been *de jure* disconnected from the Hungarian state. Culturally and linguistically, the Hungarian state has maintained linkages with the Hungarian communities within the territories that make up the former Kingdom of Hungary. State-initiated engagement within these communities has not been geographically or politically uniform and is contingent on which state they populate. For example, the Hungarian state's extraterritorial naturalisations in Vojvodina, Serbia and Transylvania, Romania have been significant but marginal in Slovakia and Croatia for a variety of reasons. Hungary's ability to incentivise Hungarian citizenship is limited in 'home states' with an equal or higher level of economic prosperity. In the case of Slovakia, domestic legislation prohibiting dual citizenship mitigated the take-up of Hungary's citizenship conferral offer.

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[314] David D Laitin, *Identity in Formation: The Russian-Speaking Populations in the near Abroad* (Cornell University Press, 1998).
[315] See Waterbury, "Internal Exclusion, External Inclusion: Diaspora Politics and Party-Building Strategies in Post-Communist Hungary."; *Between State and Nation: Diaspora Politics and Kin-State Nationalism in Hungary*.

The Hungarian state's extraterritorial naturalisation practices arguably began with the 'Hungarian ethnic card', a document distributed to the ethnic Hungarians in central and eastern Europe during the 1990s.[316] This card, otherwise known simply as the 'identity card',

> provided its holders with the most favourable conditions of entry into Hungary, free work permits within Hungary for a fixed period, awards and grants within Hungary, support for teaching in Hungarian in neighbouring countries and benefits in health care, education and cultural services within Hungary itself.[317]

Although this identity card was not a legal document, since it was insufficient for identifying the holder to officials, it differentiated those of Hungarian ethnicity from others in the states beyond Hungary's sovereign borders. This ethnic identity card did, however, allow the bearer to receive discounts at Hungarian cultural institutions and for specific products. This Hungarian card was criticised by the Venice Commission and by the Parliamentary Assembly of the Council of Europe; both stated that by issuing identity cards to citizens of another state, risks violating the territorial sovereignty of that state. They also argued that it threatened the friendly relations among the states and respect for human rights. The Venice Commission stated:

> when the law specifically aims at deploying its effects on foreign citizens in a foreign country abroad, its legitimacy is not so straightforward. It is not conceivable, in fact, that the home-state of the individuals concerned should not have a word to say on the matter. … In such form, this document… creates a political bond between these foreigners and their kinstate. Such a bond has been an understandable cause of concern for the kin home-states which, in the Commission's opinion, should have been consulted prior to the adoption of any measure at creating the documents in question.[318]

Hungarian legal engagement with 'their' population abroad lay dormant for many decades following the signing of the Treaty of Trianon. Systemic and structural factors

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[316] Mária M Kovács and Judit Tóth, "Kin-State Responsibility and Ethnic Citizenship: The Hungarian Case," in *Citizenship Policies in the New Europe*, ed. Rainer Bauböck, Bernhard Perchinig, and Wiebke Sievers, International Migration, Integration and Social Cohesion in Europe (IMISCOE) (Amsterdam University Press, 2009).
[317] Mária M Kovács, "The Politics of Dual Citizenship in Hungary," *Citizenship Studies* 10, no. 4 (2006).
[318] European Commission for Democracy Through Law (Venice Commission), "The Protection of National Minorities by Their Kin-States," (Strasbourg: Council of Europe Publishing, 2001).

undoubtedly influenced Hungary administrative capacity to interact with the ethnic Hungarians in the neighbouring states. With the end of communism in central and Eastern Europe, post-communist Hungarian politics began to centralise once again the issues relating to engaging with the ethnic Hungarians populations in the Carpathian Basin.

In 2001, the Hungarian government drafted and implemented legislation known as the Hungarian Status Law.[319] This legislation began the legal process which culminated in the extraterritorial naturalisation of the ethnic Hungarian community in some, but not all, of the nations where the ethnic Hungarian nationals reside. It began modestly, initially only recognising these communities within the Hungarian constitution and legislation. Subsequently, this Status Law allowed for a deeper forging of the legal relationship between the Hungarian state and the ethnic Hungarian community. A more significant interaction was proposed in 2004 to the Hungarian population in a referendum asking whether or not the ethnic Hungarian population abroad should be granted Hungarian citizenship.[320] The response from the Hungarian public was apathetic, and the proposal to allow for extraterritorial naturalisations failed on the grounds of insufficient voter turnout.[321] In 2010 the issue was resurrected by the incumbent leader Viktor Orbán of the Fidesz party, who, backed by a two-thirds 'supermajority' in Hungarian unicameral parliament, was able to make constitutional amendments unilaterally, which came to be known as Hungarian fundamental law.[322] One central tenet of these changes was a legal consolidation between the Hungarian state and the

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[319] There is a rich literature on the Hungarian status law. For example, see Brigid Fowler, "Fuzzing Citizenship, Nationalising Political Space: A Framework for Interpreting the Hungarian 'Status Law'as a New Form of Kin-State Policy in Central and Eastern Europe," (2002).; Michael Stewart, "The Hungarian Status Law: A New European Form of Transnational Politics?," *Diaspora: A Journal of Transnational Studies* 12, no. 1 (2003).
[320] Voters were asked the question, 'Do you wish that Parliament pass a law which would enable an applicant who declares himself/herself to be of Hungarian nationality, but is not a Hungarian citizen and does not live in Hungary, to enjoy the right of preferential naturalisation at his/her request, provided he/she can provide proof of his/her Hungarian nationality with the possession of a 'Hungarian identity card' issued on the grounds of Law LXII.19, 2001, or in any other way to be determined by the law'. Kovács and Tóth, "Kin-State Responsibility and Ethnic Citizenship: The Hungarian Case."
[321] Ibid.
[322] Miklós Bánkuti, Gábor Halmai, and Kim Lane Scheppele, "Disabling the Constitution," *Journal of Democracy* 23, no. 3 (2012).

Hungarian nation; expressly manifested in a bill removing the *ius domicile* pre-requisite for Hungarian citizenship applications.[323] In practice, this meant the Hungarian state could encourage and process large scale extraterritorial naturalisations of the ethnic Hungarian communities, who prior to the implemented bill that eased this process, would have been considered ineligible for Hungarian citizenship on the grounds of the nonfulfillment of this residential status. Of the 2.5 million eligible ethnic Hungarians, it is estimated that as of July 2016, approximately 800,000 became naturalised Hungarian citizens.[324] The implementation of this policy chiefly mirrored the proposed policies forwarded during the 2004 referendum. Controversially, however, the bill was never debated in parliament and is part of the package of constitutional changes by Viktor Orbán's Fidesz that have been widely criticised as being undemocratic and illiberal, with power consolidation lying at the heart of the objectives for the changes. It has been argued that these constitutional changes have resulted in the removal of accountability and supervision from the Prime Minister's office.[325] In anticipation of entrenchment of legislation aimed at privileging the Hungarian ethnic population abroad, Slovakia immediately introduced counter-legislation prohibiting its citizens from becoming dual nationals.[326] The Slovakian authorities implemented this counter legislation as they suspected irredentist motives were underlying Hungary's modifications to citizenship legislation.[327]

The uptake in the expedited, simplified naturalisation process was mixed and varied between the naturalising states in central Europe, generally due to the differences in material benefits derived from the Hungarian and European Union citizenship offer the naturalised citizen. For instance, in Vojvodina, demand and enthusiasm for Hungarian passports were

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[323] Costica Dumbrava, "Super-Foreigners and Sub-Citizens: Mapping Ethno-National Hierarchies of Foreignness and Citizenship in Europe," *Ethnopolitics* 14, no. 3 (2015).
[324] Pogonyi, *Extra-Territorial Ethnic Politics, Discourses and Identities in Hungary*, 170.
[325] Bálint Magyar, *Post-Communist Mafia State* (Central European University Press, 2016).
[326] Bartek Pytlas, "Radical-Right Narratives in Slovakia and Hungary: Historical Legacies, Mythic Overlaying and Contemporary Politics," *Patterns of prejudice* 47, no. 2 (2013).
[327] Arraiza, "Good Neighbourliness as a Limit to Extraterritorial Citizenship: The Case of Hungary and Slovakia."

significant, with approximately 90 per cent of those eligible (and some ineligible) applying for Hungarian citizenship at offices in Subotica, Novi Sad, and Budapest.[328] By contrast, ethnic Hungarians in southern Slovakia did not take Hungarian citizenship in large numbers, partly given the negative implications of doing so, given the introduction of Slovakian counter-legislation effectively prohibiting dual nationality, and because the associated benefits of receiving a Hungarian passport are insignificant, given Slovakia's EU member state status. This constitutes Hungarian discrimination to the benefit of Hungarians in certain countries and not in others, albeit discrimination beyond the control of the Hungarian state. In Romania, the extraterritorial naturalisations of the *Magyar* have been the most comprehensive, given that Romania has the most significant number of *Magyar* out of any state. The Romanian state has also been the most receptive to the Hungarian extraterritorial naturalisations.

Conclusion

While a state's claim to a territory is relatively straightforward, but sometimes contested, the same claim to a population can be convoluted. Individuals and communities have migrated, and borders have been redrawn. War and empire disintegration have historically resulted in territorial border revisions. The boundaries of a state might change as a result of these critical junctures, the populations that make up these political entities do not always move with the borders. Towards the end of the twenty-first century, states increasingly tried to engage with 'their' populations abroad with a range in intensity of these engagement policies. Criteria for national membership have varied too, from ethnic formulations of citizenship, to linguistic, cultural and political. Some states refer to their diasporas in other states, while others refer to

[328] Zsolt Semjén, "Unintended Consequences of Expanding Hungarian Citizenship," Hungarian Spectrum, http://hungarianspectrum.org/tag/citizenship/.

their 'nationals abroad'. Conceptually, the consequence of border revisions and centuries of migration and resettlement has meant that populations seldom neatly fit within their states, meaning that the nation and the state cannot be transposed upon one another.

Contemporary collective extraterritorial naturalisation, in the form employed by Russia and Hungary, has resulted in tension and controversy. Subsequently, these policies have been met with significant resistance and protestation from other states. Both Hungary and Russia changed citizenship legislation to permit the extraterritorial naturalisations of 'their' people abroad. These amendments to naturalisation legislation resulted in counter-legislation being passed by Slovakia and Ukraine respectively, prohibiting dual nationality out of fears that the two naturalising states are engaging in the form of irredentist politics, in a tit-for-tat process threatening diplomatic relationships in the region.

The decline of communism and the collapse of the Soviet Union in Europe towards the end of the 1980s and beginning of the 1990s brought about radical and rapid changes to the way states conduct their affairs.[329] The relationship between the state and 'its' people likewise changed drastically as these states changed ideological and systemic paths. States have had to develop policies to address these changes to the blurring lines between the internal and external.[330] One such policy has been the development of diaspora engagement policies that, as discussed in the introductory chapter to this thesis, vary significantly in scale and extent. Extraterritorial naturalisations are the most intensive of these policies aimed at engaging with an external population.[331] As with most governmental policies, extraterritorial naturalisation has developed with changes to legislation or constitution.

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[329] See, for example, Valerie Bunce and Maria Csanadi, "Uncertainty in the Transition: Post-Communism in Hungary," *East European Politics and Societies* 7, no. 2 (1993).; Michael Burawoy, *Uncertain Transition: Ethnographies of Change in the Postsocialist World* (Rowman & Littlefield Publishers, 2000).; Rey Koslowski and Friedrich V Kratochwil, "Understanding Change in International Politics: The Soviet Empire's Demise and the International System," *International Organization* 48, no. 2 (1994).

[330] Waterbury, "Internal Exclusion, External Inclusion: Diaspora Politics and Party-Building Strategies in Post-Communist Hungary."; "Bridging the Divide: Towards a Comparative Framework for Understanding Kin State and Migrant-Sending State Diaspora Politics."

[331] Délano and Gamlen, "Comparing and Theorizing State–Diaspora Relations."; Gamlen, "Diaspora Engagement Policies: What Are They, and What Kinds of States Use Them? In Working Paper 06-32."

The following chapter will expand on contemporary extraterritorial naturalisation by examining a detailed chronology of legislative amendments and implementations. It will provide a detailed timeline of key events Russia and Hungary's contemporary extraterritorial naturalisation processes. Doing so will provide an overview of how legislation is developed to permit and legitimise extraterritorial naturalisation practices. It will provide explanations for the variance in naturalisation uptake from the perspective of the eligible individuals. This overview of the process across the two cases will detail the many similarities and differences between Russian and Hungarian extraterritorial naturalisation practices.

Chapter 3: The Extraterritorial Naturalisations Processes in Legislation and Practice

The previous chapter sought to historicise and contextualise contemporary forms of extraterritorial naturalisations. It looked at the evolution and changes in structural and systemic conditions that enabled the practice. This chapter will reveal how Russia and Hungary developed its extraterritorial naturalisations policies. It will reveal notable parallels and similarities that have led to the conceptual groupings and the case selection rationale for this thesis. The chapter will provide a chronology of key events relating to the Russian and Hungarian legislation changes that enabled extraterritorial naturalisation practices. Following these chronologies, a comparison will be conducted to provide a synopsis of the processes relating to the legislative amendments that occur before extraterritorial naturalisations procedures. It will introduce the consequences of the changes to the triangular relationship between the naturalising state, the state in which the extraterritorial naturalisations are conducted, and the naturalised populations. It will highlight the variance in eligible population 'buy-in', by explaining the reasons why individuals might choose or reject the offer of another state's citizenship.

This chapter aims to detail the extraterritorial naturalisations legislation developments that enabled the practice and by doing so, will identify notable parallels and differences between the two processes. Secondly, it will aim to provide a schematic of how legislation is modified before, during and post extraterritorial naturalisations practices. The detailed representation of the extraterritorial naturalisations practices is essential as it provides a context and link to further empirical chapters, which use data gathered from fieldwork conducted in Georgia, the Baltic states, Ukraine, Hungary, Romania, Serbia and Slovakia, as it seeks to demonstrate the strategic gains made from extraterritorial naturalisations practices

within these locales. The chapter will explain some of the variances across the two cases as well as within each case.

Citizenship legislative amendments chronology

Russia

The following is a chronology of citizenship legislation implemented by the Russian Federation relevant to extraterritorial naturalisation; this includes locale-specific legislation and bills with broader applicability. Within this legislative timeline are critical events that while are separate to the legislation, are fundamental to the context within which the amendments were brought about.

Following the Soviet Union's collapse, the Russian Federation began to formulate legislation in its contemporary constitution. However, even before the constitution's implementation, citizenship legislation began to be consolidated in Russian federal law. The Russian Federation's first law regarding Russian citizenship acquisition was adopted by the Russian State Duma on 28 November 1991 and enforced from 6 February 1992.[332] The Law of the Russian Federation No. 1948-1 'On the Citizenship of the Russian Federation',

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[332] Federal Law No. 1948-1-FZ Citizenship Policy in Post-Soviet Russia 121 from 28 November 1991.
56. Under section 12(1) of Law no. 1948-1 on Citizenship of the Russian Federation of 28 November 1991, in force between 6 February 1992, and 1 July 2002 ('the 1991 Russian Citizenship Act'), Russian citizenship could be acquired by:
a) recognition of citizenship,
b) birth,
c) registration of citizenship,
d) granting of citizenship,
e) restoration of citizenship,
f) choice of citizenship, where a territory changed its nationality, and on other grounds provided for by international treaties to which the Russian Federation was a party.
57. Under section 13(1), all citizens of the USSR permanently residing in Russia on the date the Act entered into force (6 February 1992) were recognised as citizens of the Russian Federation unless they stated within a year of that date that they did not wish to have Russian citizenship.
Found at: *Case of Alpeyeva and Dzhalagoniya V. Russia*, 7549/09 and 33330/11 Jäderblom, Helena; Phillips, Stephen (2018).http://hudoc.echr.coe.int/eng?i=001-183537

enshrined the primary legislation that defined citizenship and naturalisation criteria.[333] This citizenship legislation was implemented, along with the Russian Federation's constitution, on 12 December 1993.[334] This initial legislation was meant to be as inclusive as possible and meant that immediately following the collapse of the Soviet Union, all citizens of the former Soviet Union were eligible to receive citizenship from the Russian Federation. [335] Those who did not register their opposition to becoming Russian citizens received citizenship automatically if they were registered on the territory of the Russian Soviet Federative Socialist Republic (RSFSR). From 30 December 1992, the process was no longer automatic, but still open to those who registered their intent to receive Russian citizenship within three years. This already comprehensive citizenship policy was further broadened by an amendment on 17 June 1993, which removed the requirement to renounce other state's citizenship upon conferral of Russian citizenship, a previous prerequisite when obtaining Russian citizenship. The Russian Federation's constitution did not prohibit dual citizenship for those born with Russian citizenship; Article 62 paragraph 1 states: 'a citizen of the Russian Federation may have the citizenship of a foreign State (dual citizenship) according to the federal law or an international agreement of the Russian Federation.'[336] Therefore, both naturalised and those

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[333] *Russian Federation Federal Law on Citizenship of the Russian Federation*.https://www.refworld.org/docid/50768e422.html ; http://pravo.gov.ru/proxy/ips/?docbody=&nd=102076357

[334] Gennady M Danilenko, "The New Russian Constitution and International Law," *American Journal of International Law* 88, no. 3 (1994).

[335] Federal Law No. 1948-1-FZ Citizenship Policy in Post-Soviet Russia 121 from 28 November 1991.
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57. Under section 13(1), all citizens of the USSR permanently residing in Russia on the date the Act entered into force (6 February 1992) were recognised as citizens of the Russian Federation unless they stated within a year of that date that they did not wish to have Russian citizenship.
Found at: *Case of Alpeyeva and Dzhalagoniya V. Russia*.http://hudoc.echr.coe.int/eng?i=001-183537

[336] The Russian Federation, "The Constitution of the Russian Federation: (Adopted by Referendum, December 1993) : Collated with the "Yeltsin" Draft Constitution, July 1993," (1995).

born with Russian citizenship were able to hold dual citizenship from this date. In practice, despite the relatively inclusive nature of the legislation, the requirement for proof of permanent residence meant a slow bureaucratic process.[337]

Towards the end of the 1990s, the term 'Compatriots' was used for the first time to define the Russian diaspora and was incorporated into Russian legislation on 24 May 1999;[338] this is a pivotal moment in the Russian citizenship legislation as the use of the term 'Compatriot' has shaped Russian foreign policy and extraterritorial naturalisations. The term 'Compatriot' is understood to be all persons and their descendants living abroad who have historically lived in the Russian Federation's territory. Compatriots are also those people who chose to engage in a spiritual, cultural, and legal relationship with Russia but does not denote ethnicity.

> Those persons whose direct relatives were or are nationals of the Russian Federation, were citizens of the USSR, lived in the states which were part of the USSR, obtained citizenship of these states or became stateless persons, and also expatriates (emigrants) from the Russian Empire, the Russian republic, RSFSR, the USSR and the Russian Federation, having the corresponding citizenship and who afterwards become citizens of a foreign state or stateless persons.[339]

Not all of the modifications to Russian citizenship and naturalisation legislation have moved towards simplification of acquisition. On 31 May 2002, Russian naturalisation legislation was modified when the Russian State Duma implemented law No. 62-FZ, which replaced the Russian Citizenship Law of 1991. Articles 13 and 14 of this modified Russian citizenship legislation and naturalisation procedure for citizens of the former Soviet Union, removed the automatic eligibility for citizens of the former Soviet Union.[340] Despite framing the

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[337] Oxana Shevel, "The Politics of Citizenship Policy in Post-Soviet Russia," *Post-Soviet Affairs* 28, no. 1 (2012).
[338] *Federal Law of the Russian Federation of 24 May 1999 No. 99-FZ. As Ammended on 23 July 2013*.https://cis-legislation.com/document.fwx?rgn=1407
[339] Ibid.https://cis-legislation.com/document.fwx?rgn=1407
[340] *Russian Federation Federal Law on Citizenship of the Russian Federation*.https://www.refworld.org/docid/50768e422.html ; http://pravo.gov.ru/proxy/ips/?docbody=&nd=102076357

amendments as a simplification of the naturalisation procedure, it made it more restrictive. Significantly, the modifications required residence on the territory of the Russian Federation and knowledge of the Russian language. Approximately one year later on 11 November 2003, the Russian Federation implemented Federal Law No. 151-FZ which amended Article 14 of law No. 62-FZ. This law detailed the naturalisation requirements to include the following persons: 'foreign citizens and stateless persons and therefore who have been citizens of the USSR who have come to the Russian Federation from the states which formed part of the USSR.'[341] This amendment is significant as it allowed for those residing in the former Soviet republics who rejected the offer of citizenship from their respective 'home state' and were thus 'stateless' in the eyes of the Russian Federation, to receive Russian citizenship, even if they continued to reside in their 'home state'.[342]

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[341] Foreign citizens and stateless persons and therefore who have been citizens of the USSR who have come to the Russian Federation from the states which formed part of the USSR, who are registered at the place of residence in the Russian Federation as on 1 July 2002, or have received a permit for temporary residence in the Russian Federation shall be admitted to citizenship of the Russian Federation in the simplified manner without observing the conditions provided for by Items 'a', 'c' and 'e' of Part One of Article 13 of this Federal Law and without presenting a residence permit if they, before 1 January 2006, declare their wish to become citizens of the Russian Federation. Source: ibid.

[342] Article 13. Admission to the Citizenship of the Russian Federation under the General Procedure:
1. Foreign nationals and stateless persons aged 18 or older and possessing legal capacity may apply for admission to the citizenship of the Russian Federation under the general procedure provided that they: a) have resided in the territory of the Russian Federation for five uninterrupted years since being granted a residence permit and until the date of applying for admission to the citizenship of the Russian Federation, except for the cases provided for in part two of this Article. The period of residence shall be deemed uninterrupted if the person travelled outside the Russian Federation for not more than three months in one year; b) undertake to comply with the Constitution of the Russian Federation and laws of the Russian Federation; c) have a lawful source of existence; d) applied to competent authority of a foreign State for renunciation of another current citizenship.[342] The renunciation of another citizenship shall not be required if it is provided for by an international treaty of the Russian Federation or this Federal Law, or if the renunciation of another citizenship is impossible for reasons beyond the person's control; e) know the Russian language; the procedure for assessing the knowledge of the Russian language shall be determined by the rules on the procedure for considering matters concerning the citizenship of the Russian Federation.
2. The period of residence referred to in item a) of part one of this Article may be shortened in the presence of at least one of the following grounds: a) birth in the territory of the RSFSR and previous possession of USSR citizenship; b) being married to a citizen of the Russian Federation for at least three years; c) being unemployable and having a capable son or daughter who has reached the age of 18 and possesses the citizenship of the Russian Federation; d) high achievements in science, technology or culture or possession of a profession or qualification of interest to the Russian Federation; e) political asylum granted in the territory of the Russian Federation; f) recognition as a refugee according to the procedure established by federal law.
3. A person who has done special services to the Russian Federation may be admitted to the citizenship of the Russian Federation without complying with the requirements provided by part one of this Article.

Article 14. Admission to the Citizenship of the Russian Federation under the Simplified Procedure:

Following the Russo-Georgian war in 2008, and the *de facto* incorporation of the separatist Georgian states of Abkhazia and South Ossetia into the Russia state in 2009, Article 13 of No. 62-FZ once again modified. This second modification to Article 13 of the same citizenship legislation, delayed the deadline date for presenting the required residence permit from 1 January 2006, to 1 January 2009, which therefore allowed for the naturalisations of those, who up until the conflict, had refused to accept Russian citizenship in South Ossetia and Abkhazia, by effectively removing the residency requirement on Russian territory from the naturalisation procedure.[343]

On 17 June 2008, Presidential Decree No. 977 came into force in Russia, 'On the procedure for entry into the Russian Federation and exit from the Russian Federation for stateless persons who were citizens of the USSR and residing in the Republic of Latvia or the Republic of Estonia', which allowed for visa-free travel to Russia for those in Latvia and Estonia holding grey passports, or those with 'undefined' or stateless citizenship status. This change resulted in significant uptake of Russian citizenship conferral within these states and was followed by a wave of Russian extraterritorial naturalisations.[344]

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1. Foreign nationals and stateless persons aged 18 or older and possessing legal capacity may apply for admission to the citizenship of the Russian Federation under the simplified procedure without meeting the requirements referred to in item a) of part one, of Article 13 of this Federal Law, provided that they:
a) have at least one unemployable parent possessing the citizenship of the Russian Federation.
b) possessed USSR citizenship, resided and still reside in States that formed part of the USSR, received no citizenship of those States and remained stateless persons as a result.
2. Admitted to the citizenship of the Russian Federation under the simplified procedure, without meeting the requirements referred to in part one of Article 13 of this Federal Law, shall be the following children or incapable persons who are foreign nationals or stateless persons:
a) a child whose either parent possesses the citizenship of the Russian Federation - upon application by such parent and subject to the consent of the other parent to the acquisition by the child of the citizenship of the Russian Federation. Such consent shall not be required if the child resides in the territory of the Russian Federation.
b) a child whose single parent possesses the citizenship of the Russian Federation - upon application by such parent; c) a child or incapable person placed under guardianship or trusteeship - upon application. Source: ibid.

[343] Heidi Tagliavini, "Independent International Fact-Finding Mission on the Conflict in Georgia," *Vol. I–III, EU* (2009).

[344] Artjoms Ivļevs and Roswitha M King, "From Immigrants to (Non-) Citizens: Political Economy of Naturalisations in Latvia," *IZA Journal of Migration* 1, no. 1 (2012).; Priit Järve, "Estonian Citizenship: Between Ethnic Preferences and Democratic Obligations," in *Citizenship Policies in the New Europe*, ed. Rainer Bauböck, Bernhard Perchinig, and Wiebke Sievers (Amsterdam University Press, 2009).

Russian citizenship and naturalisation legislation have gone through periods of expansion and contraction in terms of eligibility and has not been a linear progression towards citizenship expansionism. On 8 February 2012, the Russian Federation's State Duma rejected draft legislation, known as Zatulin's law, which intended to facilitate the naturalisation of Russian Compatriots Abroad.[345] Although this legislation was rejected, the debate about granting citizenship to all Compatriots has resurfaced at various points since 2012.

The annexation of Crimea in 2014 was monumental for the Russian Federation and particularly for those within, or on the periphery of, Russia's sphere of influence. With regards to Russian legislation, the intervention on the Crimean Peninsula brought about rapid changes. As part of the annexation of Crimea from Ukraine, on 21 March 2014, the Russian State Duma accepted Article 4(1) of Federal Constitutional Law No. 6-FKZ, 'On the Acceptance of the Republic of Crimea into the Russian Federation and the Creation of New Federal Subjects – the Republic of Crimea and the City of Federal Significance Sevastopol', which incorporated the Crimean Peninsula into Russian Federal territory under Russian legislation.'[346] Following this, Russia modified and implemented legislation at a rapid rate. Just under a month later, on 20 April 2014, Law 71-FZ amended the Federal Law Article 14 'On Citizenship of the Russian Federation and Certain Legislative Acts of the Russian Federation' which simplified the naturalisation process for Russophones. This modification stated 'a person recognised as a speaker of the Russian language will be given notice of the possibility of receiving Russian citizenship.[347] On 20 May 2014, the Russian Federation passed a bill that authorised a fine of 200,000 roubles or 400 hours' community service for

[345] Marlène Laruelle, "Russia as a "Divided Nation," from Compatriots to Crimea: A Contribution to the Discussion on Nationalism and Foreign Policy," *Problems of Post-Communism* 62, no. 2 (2015).; Melvin, *Russians Beyond Russia*.
[346] The Kremlin, "Agreement on the Accession of the Republic of Crimea to the Russian Federation Signed," http://en.kremlin.ru/events/president/news/20604.
[347] *Russian Federation Federal Law on Citizenship of the Russian Federation*.

Russians who failed to declare their second nationality and thus included recently naturalised citizens.[348]

On 8 June 2015, the Russian Federation authorities began issuing Russian passports to the Transnistria residents via consulates in Tiraspol, inaugurating Russian extraterritorial naturalisation practices in Moldova enabled by the aforementioned legislative changes in 2014 to the naturalisation procedure.[349]

In May of 2016, the Article dealing with legislation on Russian naturalisation procedures, Article 14, was again amended and further expanded the number of potential applicants and allowed for the naturalisation of Ukrainian citizens without requiring the applicant to renounce Ukrainian citizenship.[350] In an apparent attempt to increase pressure on Ukraine following the conflict in Crimea and the east of the country, on 18 February 2017, Vladimir Putin signed the decree: 'On the recognition in the Russian Federation of documents and license plates of vehicles issued to citizens of Ukraine and stateless persons permanently residing in the territories of certain districts of Donetsk and Lugansk regions of Ukraine'. This decree means Russia began to recognise passports and identity cards issued by the separatist regimes in Eastern Ukraine.[351] Later that year, on 12 July 2017, the Russian State Duma adopted a law: 'On Amendments to the Federal Law' On Citizenship of the Russian Federation', which further simplified the naturalisation procedure for Ukrainian citizens

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[348] Alissa de Carbonnel, "Russia Moves to Make Failure to Declare Dual Citizenship a Crime," Reuters, https://www.reuters.com/article/us-russia-bill-dualcitizens/russia-moves-to-make-failure-to-declare-dual-citizenship-a-crime-idUSBREA4J0MJ20140520.

[349] Halya Coynash, "Russian Passports Handed out in Transnistria as "Tension Rises"," Website of the Kharkiv Human Rights Protection Group, http://khpg.org/en/index.php?id=1434310866.

[350] Russian Federation Federal Law on Citizenship of the Russian Federation:
Article 14. Admission to the Citizenship of the Russian Federation under the Simplified Procedure:
12) used to live or lives in a former Soviet Union republic but does not have citizenship or is a stateless person;
13) was born in the Russian Soviet Federative Socialist Republic and had citizenship of the Soviet Union;
Russian Federation Federal Law on Citizenship of the Russian Federation.;
http://pravo.gov.ru/proxy/ips/?docbody=&nd=102076357

[351] BBC News, "Russia Accepts Passports Issued by East Ukraine Rebels," BBC News, https://www.bbc.co.uk/news/world-europe-39018429.

wishing to receive Russian citizenship. The Russian State Duma Committee on State Construction and Legislation stated:

> It is established that for the acquisition of Russian citizenship by a person permanently residing lawfully on the territory of the Russian Federation, a recognised bearer of the Russian language, the refusal of his Ukrainian citizenship is carried out by sending them an application for the renunciation of Ukrainian citizenship to the authorised body of this state.[352]

Previously a certificate was required proving the renouncement of Ukrainian citizenship, now only a signature on a form is required.

In a move to once again expand the number of those eligible for Russian citizenship, on 27 August 2018, the government of the Russian Federation submitted a proposed bill that simplified the procedure for Russian citizenship acquisition for members of the state program on resettlement of Compatriots living abroad.[353]

In 2019 the Russian Federation once again attempted to ratchet the pressure on Ukraine regarding their occupied territories by permit extraterritorial naturalisation practices within eastern Ukraine. On April 2019, the Russian Federation's State Duma amended the constitution, and Vladimir Putin signed a decree amending Federal Law of 31 May 2002 No. 62-FZ 'On Citizenship of the Russian Federation', by introducing an amending paragraph to the legislation with immediate effect.

> 1. To establish that persons permanently residing in the territories of certain regions of the Donetsk and Luhansk regions of Ukraine have the right to apply for citizenship of the Russian Federation in a simplified manner in accordance with part eight of Article 14 of Federal Law of 31 May 2002 No. 62 -FZ 'On Citizenship of the Russian Federation'.[354]

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[352] The Kremlin, "Amendments to the Laws on Citizenship and Legal Status of Foreign Citizens," The Kremlin, http://en.kremlin.ru/acts/news/55227.
[353] Russian Legal Information Agency (RAPSI), "Simplified Procedure of Obtaining Russian Citizenship Proposed for Foreign Compatriots," http://www.rapsinews.com/legislation_news/20180827/286773657.html.
[354] Persons referred to in paragraph 1 of this Edict:
a) submit applications for admission to the citizenship of the Russian Federation in the form according to the appendix to the authorised territorial bodies of the Ministry of Internal Affairs of the Russian Federation, the list of which is determined by this Ministry.
b) submit together with applications for citizenship of the Russian Federation the following documents containing the applicant's personal data and their copies:

Following this decree, Vladimir Putin expressed his intent to expand these practices, by stating at the Belt and Road Summit in Beijing, 'in general, we are thinking of giving our citizenship, in a simplified manner, to the citizens of Ukraine'.[355] Significantly, those eligible are required to swap the documents issued by either the separatist 'governments' the Luhansk Peoples Republic or the Donetsk Peoples Republic.

On 24 April 2020, the Russian State Duma passed legislation that permitted naturalised Russian citizens to maintain dual citizenship status by removing the requirement to renounce a foreign citizenship during the process.[356]

There are two distinct forms of Russian extraterritorial naturalisations, those that have immediately followed military interventions (South Ossetia, Abkhazia, Crimea, and Donbas) and those conducted at a clandestine, less intensive level (Estonia, Latvia, and Moldova). The impact and process of these two distinct types of extraterritorial naturalisations will be elaborated on later in this thesis.

Hungary

The following is a chronology of Hungarian legislation adoptions, rejections, debates, and actions regarding extraterritorial naturalisations specifically and bills concerning citizenship

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identity document required by Decree of the President of the Russian Federation dated 18 February 2017 No. 74 'On the recognition in the Russian Federation of documents and registration marks of vehicles issued to citizens of Ukraine and stateless persons permanently residing in the territories of certain regions of Donetsk and Lugansk regions of Ukraine ', With a note of registration at the place of residence in the territory of the corresponding region of Donetsk or Lugansk region of Ukraine.
The Kremlin, "Decree on Determining for Humanitarian Purposes the Categories of Persons Entitled to Apply for Russian Citizenship in a Simplified Manner," Kremlin, http://kremlin.ru/acts/news/60358.

[355] Olga Tana and Stepan Kravchenko, "Putin Says Russia May Make Passport Offer to All Ukrainians," Bloomberg, https://www.bloomberg.com/news/articles/2019-04-27/putin-says-russia-may-extend-passport-offer-to-all-ukrainians.

[356] *Federal Law No. 134-FZ of 24 April 2020 "on Amendments to the Federal Law" on Citizenship of the Russian Federation "in Terms of Simplifying the Procedure for Admitting Foreign Citizens and Stateless Persons to Citizenship of the Russian Federation".*

and dual citizenship within Hungary more generally. It refers to both locale-specific legislation and broader issues.

On 23 October 1989, when the communist regime in Hungary was formally abolished, the 1949 Hungarian constitution was reimplemented. In the subsequent years, amendments were made to the former constitution. One of which, was Act LV on Hungarian Citizenship which was amended on 15 June 1993 to incorporate some ethnic preferential criteria into the Hungarian constitution regarding (re)acquisition of Hungarian citizenship. Section 4 - (3), was added stating,

> Upon request, a non-Hungarian citizen whose ascendant was a Hungarian citizen or who is able to substantiate of being of Hungarian origin may be naturalised on preferential terms if he/she proves that he/she is sufficiently proficient in the Hungarian language.[357]

In 2001 the Hungarian state implemented legislation referring to Hungarians abroad, known as the 'Status Act' or Act LXII On Hungarians Living in Neighbouring Countries; this introduced the notion of 'a single Hungarian nation' and established a series of benefits for ethnic kin abroad. According to the Act, people are considered ethnic Hungarian if they are 'persons declaring themselves to be of Hungarian nationality who are not Hungarian citizens'.[358] As part of this act, a 'Hungarian Card' was distributed to ethnic Hungarians abroad; this card allowed the holders to enter and reside in Hungary and served as a quasi-identity card vis-à-vis the Hungarian state[359] and can be considered to be the first tangible attempt by the Hungarian state to document the Hungarian nationals abroad.

On 23 June 2003, the Hungarian status act was modified due to the Romanian and Slovakian governments', and the European Commission's protestation of this act. Romania and Slovakia were concerned with the resulting political interference, and the European

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[357] *Act LV of 1993 on Hungarian Citizenship* .
[358] *Act LXII of 2001 on Hungarians Living in Neighbouring Countries*.
[359] Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."

Commission was concerned at the phrasing being overtly focused on ethnicity resulting in preferential treatment, therefore being ethnically discriminatory.[360]

In a bid to expand the scope of the legal linkages between the Hungarian state and Hungary's external population, on 5 December 2004, the Hungarian state held a referendum on whether to provide citizenship to the *Magyars* in the territories encompassing the former Kingdom of Hungary. Voters were asked: 'Do you want the Parliament to pass a law that enables ethnic Hungarians with non-Hungarian citizenship and residence, who affirm their Hungarian nationality, either with a Hungarian identity card described in Paragraph 19 of Act LXII/2001 or in a way specified in the forthcoming law, to apply for and be granted Hungarian citizenship?' Although the referendum had the support of those voting, it ultimately failed to be passed into legislation due to insufficient voter turnout.[361]

On 25 April 2010, in a partnership with the KDNP (Christian Democratic People's Party), Fidesz, under the leadership of Viktor Orbán, achieved electoral victory with a two-thirds 'super' majority.[362] This meant that Fidesz-KDNP could pass amendments to the Hungarian constitution as their majority in parliament provided them with the necessary mandated two-thirds of the vote. One of the first bills passed on 26 May 2010, under accelerated procedures, was the amendments to Hungarian Citizenship Law. This law allowed for the naturalisation on preferential terms of individuals 'whose ascendant was a Hungarian citizen', or 'who demonstrates the plausibility of his or her descent from Hungary and proves his or her knowledge of the Hungarian language';[363] this effectively removed the residency

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[360] Aleksandra Maatsch, *Ethnic Citizenship Regimes: Europeanization, Post-War Migration and Redressing Past Wrongs* (Springer, 2011), 68.
[361] The results of the vote were as follows. For: 1,521,143, 51.6%; Against: 1,428,736, 48.4%; Total: 3,010,972. Registered voters/turnout: 8,048,737, 37.5%. Found in Rainer Bauböck, "Expansive Citizenship—Voting Beyond Territory and Membership," *PS: Political Science & Politics* 38, no. 04 (2005).
[362] Pytlas, "Radical-Right Narratives in Slovakia and Hungary: Historical Legacies, Mythic Overlaying and Contemporary Politics."
[363] — established: by paragraph (2) Section 2 of Act XLIV of 2010. In force: as of 20. 08. 2010. Shall apply to proceedings opened after 1 January 2011.

prerequisite for naturalisation, permitting extraterritorial naturalisations.[364] This bill was accompanied by a commitment from the Hungarian government to allocate 2,519,661 EUR between 2010 and 2012 to fund the extraterritorial naturalisations.[365] Government Resolution No.1162 stated that this budgetary allowance would be split between the Ministry of the Interior, Foreign Affairs, Public Administration and Justice, and Defence, to allow for the costs associated with the necessary infrastructure, institutions and employees.[366]

On 18 April 2011, the Fidesz-KDNP government implemented the 'Hungarian Fundamental Law' making substantial constitutional changes. Included in these changes were modifications to citizenship legislation:

> Hungary, guided by the notion of a single Hungarian nation, shall bear responsibility for the fate of Hungarians living outside its borders, shall foster the survival and development of their communities, shall support their endeavours to preserve their Hungarian identity, and shall promote their cooperation with each other and with Hungary.[367]

Although it was initially suspected that those naturalised residing abroad would be ineligible to vote in Hungarian presidential elections and referenda due to a lack of residency in Hungary,[368] on 23 December 2011, the Fidesz led government passed a new electoral law to be applied to the coming presidential elections.[369] This new law eliminated the necessity for Hungarian voters to have residency within Hungary, thus permitting the recently naturalised Hungarians to vote.[370] The Hungarian parliament stated that this electoral law was amended,

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[364] Government of Hungary, "Explanatory Note to the Amendment to the Hungarian Citizenship Law," Website of the Hungarian Government, http://allampolgarsag.gov.hu/images/angol.pdf>
[365] Found in: Mária M Kovács and Judit Tóth, "Country Report: Hungary," (EUDO Citizenship Observatory: European University Institute, Florence, 2013). 'Government Resolution No.1162 of 4 August 2010, provided surplus 830 million HUF to 2010, Government Resolution No.1135 of 2 May 2011 provided surplus 3359.1 million HUF to 2011, Government Resolution No. 1164 of 18 May 2012, ensured surplus 3221.2 million HUF to 2012'.
[366] Judit Tóth, "Update: Changes in the Hungarian Citizenship Law and Adopted on 26 May 2010," *EUDO Observatory on Citizenship* (2010).
[367] Article D *The Fundamental Law of Hungary*.
[368] Tóth, "Update: Changes in the Hungarian Citizenship Law and Adopted on 26 May 2010."
[369] Act CCIII OF 2011 on the Elections of Members of Parliament of Hungary
[370] Section 12. Paragraph (3) of Subsection 12 of Article 7 of Act CCIII OF 2011 on the Elections of Members of Parliament of Hungary states: Voters without residence in Hungary may vote for one party list

'guaranteeing furthermore that Hungarian citizens living beyond the borders of Hungary shall be a part of the political community'.[371]

The legislative evolution similarities

From the chronology of events detailed above, it is possible to formulate a process flow, as shown in Figure 7 below, that compares the Russian and Hungarian forms of extraterritorial naturalisations. Both Russia and Hungary had to formulate and implement constitutions following the collapse of the Soviet Union and communism, respectively. It is also worth noting that in each of the states where the two states enact their extraterritorial naturalisation practices, independence has been achieved relatively recently.[372] Therefore, constitutions and citizenship legislation are somewhat contemporary.

The extraterritorial naturalisation processes are separate yet similar.[373] However, there is one main fundamental difference between the Russian and Hungarian variations of this practice; amendments to naturalisation legislation by Russia occurred after the extraterritorial naturalisations, whereas Hungary amended naturalisation prerequisites before conducting extraterritorial naturalisations. The potential reasons for this may be because of structural variations between the two cases. Russia, a dominant regional hegemon and world power, has shown resistance to international involvement and attempts to make Russia accountable to supra-national organisations. Likewise, Hungary has employed similar rhetoric denouncing international bodies, such as the EU, for intrusive involvement in their affairs. Crucially, however, Hungary does have a form of supra-national accountability it needs to consider, the

[371] European Commission for Democracy Through Law (Venice Commission), "Act CCIII of 2011 on the Election of Members of Parliament of Hungary as of 3 March 2014," (2014).
[372] Russian and Hungarian extraterritorial naturalisation practices are conducted exclusively in post-communist states within the former Soviet Union, the former Yugoslavia, former Czechoslovakia, or communist Romania.
[373] See Figure 7

European Union, which has intervened and commented on Hungarian citizenship legislation requiring responses and modifications.[374]

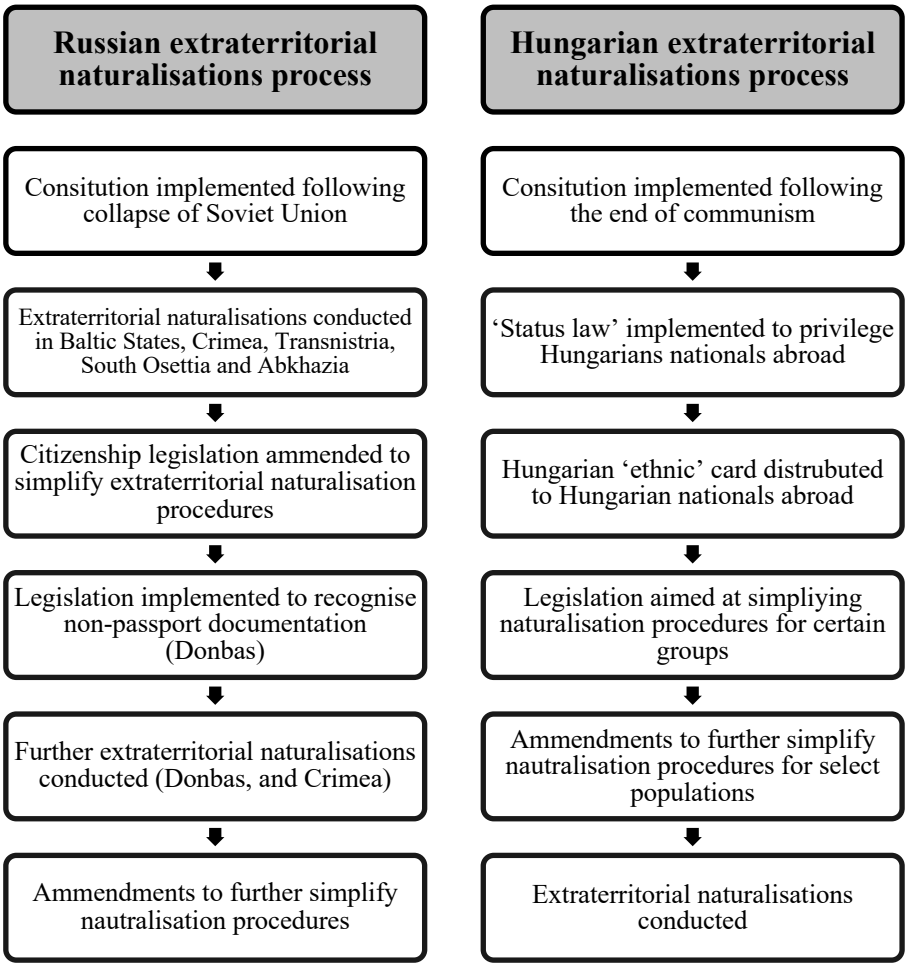


Figure 7. The extraterritorial naturalisation processes compared

It is not puzzling that knowledge of the Russian or Hungarian language is a defining prerequisite for obtaining the respective countries' citizenship through naturalisation procedures; this is a norm of most citizenship regimes. It has been mentioned previously that Russian extraterritorial naturalisations should be conceptualised as being inclusive, given its broad scope, while Hungarian extraterritorial naturalisations are exclusive. One explanatory factor for this phenomenon is the status, both current and former, for each state. Russia is a

[374] Although Berlusconi's use of extraterritorial naturalisations of Latin Americans in the 1990s was conducted under the same supra-national authority, the difference here lies in the location; Hungary is conducting extraterritorial naturalisations in EU states and states which the EU is close to, politically and geographically. Berlusconi was conducting naturalisations in Latin America and was therefore outside of the direct gaze of the EU.

regional hegemon; the Russian language, the *lingua franca* of the Soviet Union, is spoken widely across the states that make up the former Soviet Union, though decreasingly so.[375]

Conversely, Hungary has not been a regional power for over a century, and a half,[376] and when it was, the Hungarian language was not the *lingua franca* of the Austrian-Hungarian empire. The difference in the statuses of the two languages means that even before the intent of the extraterritorial naturalisations policies is considered, implementing the language prerequisite makes Hungarian extraterritorial naturalisations more exclusive than inclusive and vice-versa. The linguistic prerequisite component of extraterritorial naturalisations echoes broader questions about how national identities are imagined, defined, consolidated and sometimes contested. The state's role in this is essential, and naturalisation criteria are an evocative lens through which to observe this role.

The extraterritorial naturalisation processes

The differences in process between conventional naturalisation procedures and the collective extraterritorial naturalisation practices examined for the thesis are fundamental to the scale of the practice, thereby significantly altering the impact. In order to demonstrate these distinctions, a brief outline of the UK's naturalisation process will serve as an example and is provided below.

Fundamentally, the first step is for the individual to approach the UK's Home Office to set up an account to begin the naturalisation procedure. Following this initial step, the applicant is asked whether they meet the naturalisation criteria before beginning the

[375] Paul Stronski, "There Goes the Neighborhood: The Limits of Russian Integration in Eurasia," (Carnegie Endowment for International Peace, 2020).
[376] The Kingdom of Hungary became part of the Austro-Hungarian Empire in 1867.

application. The process is divided into two steps depending on whether the applicant is married to a British citizen or not. For those that are, the broad criteria as follows: -

- Are aged 18 or over when you apply
- Are married to or the civil partner of a British citizen on the date of application
- Are of sound mind, so that you understand the step you are taking
- Can communicate in English (or Welsh or Scottish Gaelic) to an acceptable degree
- Have sufficient knowledge about life in the UK[377]
- Are of good character[378]
- Have lived in the UK for a minimum of 3 years[379]

For those that are not married to a British Citizen, all of the above apply, as well as the additional two criteria: -

- Intend to continue to live in the UK, or to continue in Crown service, the service of an international organisation of which the UK is a member of the service of a company or association established in the UK
- Have lived in the UK for a minimum of 5 years[380]

Once the relevant criteria are demonstrated by completing form AN[381] online or via the post, a fee of £1300 is payable.[382] If the application is successful, the applicant is then required to book and attend a citizenship ceremony where the applicant is required to 'make an oath of allegiance (or an affirmation) and a pledge. … to promise to respect the rights, freedoms and laws of the UK.'[383] Attending this ceremony also attracts a fee. According to a leading immigration solicitor, the process typically takes between five and seven months.[384]

The previous section highlighted the changes to Russia and Hungarian citizenship and naturalisation legislation that have enabled extraterritorial naturalisation. This section will

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[377] Demonstrated by passing the UK's Life in the UK and government certificated English language courses or providing proof of a degree in English.
[378] Demonstrated by the provision of character references and lack of criminal record.
[379] The Government of the United Kingdom and Great Britain, "Naturalisation Booklet –the Requirements," ed. Home Office (2020).
[380] Ibid.
[381] Ibid.
[382] The Government of the United Kingdom and Great Britain, "Fees for Citizenship Applications and the Right of Abode from 6 April 2018," https://www.gov.uk/government/publications/fees-for-citizenship-applications/fees-for-citizenship-applications-and-the-right-of-abode-from-6-april-2018.
[383] "Citizenship Ceremonies," https://www.gov.uk/citizenship-ceremonies.
[384] Visa and Migration - The Visa Advice Service, "British Naturalisation Timeline," https://www.visaandmigration.com/blog/british-naturalisation-timeline/.

address the extraterritorial naturalisation process. In other words, how was this practice conducted? The purpose is to reveal the scale, similarities, and differences in the practice's operationalisation across the cases and sub-cases, as is shown in Table 1 below, detailing the number of people naturalised by the two states. How the practice is conducted is vital in inferring the intent of the states. Within both cases, the primary point of differentiation is whether or not extraterritorial naturalisations are conducted clandestinely. It might seem evident that Russia and Hungary have conducted extraterritorial naturalisations secretively in states which prohibit dual citizenship. However, even within the clandestine form of naturalisation, there are fundamental differences. There is also variance within the Russian form of extraterritorial naturalisation, which does not exist in the Hungarian practice, in that the Russian Federation has conducted the practice in *de facto* independent or secessionist states. This section of this empirical chapter is based primarily on data collected from interviews with individuals involved in the process and secondary sources commenting on the practice. The number of people naturalised by the two naturalising states are significant but, for reasons discussed throughout this chapter, vary between the 'home states'.[385]

[385] See Table 1

Table 1. Extraterritorial naturalisations in numbers[386]

	Naturalising State									
	Russia						**Hungary**			
Home' or former 'Patron State.'	**Baltic States**	**South Ossetia**	**Abkhazia**	**Transnistria**	**Crimea**	**Donbas**	**Romania**	**Vojvodina**	**Slovakia**	**Ukraine**
'First wave' numbers naturalised	155,440	19,350	40,000	170,000	60,000	n/a	492,065	153,911	2,906	150,620
'Second wave' numbers naturalised	n/a	34,060	144,488	n/a	2,000,000*	136,000				
Percentage of eligible population naturalised	19.93%	98.00%	80.00%	30.63%	99.00%*	68.00%	40.00%	60.60%	0.60%	96.20%
Total naturalised	**155,440**	**53,410**	**184,000**	**170,000**	**2,000,060**	**492,065**	**153,911**	**153,911**	**2,906**	**150,620**

Russia

Not all extraterritorial naturalisations conducted by the Russian Federation have been conducted in the same manner. The following will highlight how the Russian form of the practice has been flexibly enacted depending on circumstance and intent.

Between the collapse of the Soviet Union and 2002, the Russian Federation conducted extraterritorial naturalisations in the Crimea, Transnistria, and the Baltic States of Estonia and Latvia, where ethnicity was the salient characteristic in what might be considered as the 'first wave' of extraterritorial naturalisation. The 'second wave' of extraterritorial naturalisation

[386] Table collated from various sources, each of which are detailed later in the chapter when discussing the individual 'home state' cases.
* The naturalisation numbers in Crimea during the 'second wave' are included in this table as the annexation of the Crimea by the Russian Federation in 2014 is contested and deemed illegal by the larger international community. However, during the discussion of this wave in Crimea later in this chapter, I use the term naturalisation rather than extraterritorial naturalisation.

conducted by Russia is one where the military, in the form of Russian peacekeeping forces breaching laws on neutrality, was present during the process. The first wave was conducted on a far smaller scale to that of the second wave and therefore is more analogous to archetypal naturalisation procedures conducted by states, meaning on an individual case-by-case basis. In both waves, the Russian Federation has denied that it has conducted a systematic extraterritorial naturalisation practice in these regions;[387] acknowledging the practice would be an admission of guilt with regards to the violation of the sovereign territorial integrity of another state. Providing identity documentation to established citizens is a function of consulates, embassies, and other legitimate administrative outposts on foreign soil, however, naturalisations and the issuance of new passports and nationality conferral is not a normal function.[388]

The ethnic component of Russian extraterritorial naturalisation – The 'first wave'

It has often been argued that Russia's extraterritorial naturalisations are a manifestation of Russian ethnic-nationalism and expansionism.[389] The ethnic component of the extraterritorial naturalisation practice conducted by Russia is not wholly inaccurate, particularly when considering the 'first wave' of the extraterritorial naturalisations but is not comprehensive enough to explain the whole scenario. At each sub-case level, this section will demonstrate how extraterritorial naturalisation practices within the Russian 'first wave' of extraterritorial naturalisations were conducted. The processes outlined are compiled from a combination of personal interviews with state officials involved with, or impacted by, the processes and secondary sources.

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[387] Tagliavini, "Independent International Fact-Finding Mission on the Conflict in Georgia."
[388] Turack, *The Passport in International Law*.
[389] See for example, Sertan Akbaba, 'Russian Post-Nationalism or Pan-Ethnicity? The Case of Compatriots in South Ossetia, Abkhazia and Crimea,' *Boğaziçi Journal* 32, no. 2 (2018)

The most salient characteristic of the first wave of Russian extraterritorial naturalisation was ethnicity. In other words, during this wave, the Russian Federation predominately naturalised ethnic Russians in Georgia, Ukraine, Estonia, and Latvia. Crucially, however, it is vital to note that the naturalisations of these persons have not been absolute, meaning that not all ethnic Russians in these regions have been naturalised. The naturalisations have also been conducted mostly at an individual level, meaning the state in which the naturalisations have occurred, can do little to detect and prevent their occurrence.

While these extraterritorial naturalisations might be considered more legitimate than their overtly collective counterpart, given they are at the individual level, they were not conducted without impact nor state protestation. They have impacted the inter-state relations with Russia and the states in which they conduct the naturalisations.

Abkhazia and South Ossetia – 1992 to 2002

Former Ministry of Foreign Affairs Tedo Jeopardize asserted that '[Russian passportization in Georgia] started quite long ago, let us say in the last century, in the early 90s after the collapse of the Soviet Union.' [390] The Russian extraterritorial naturalisation in the Georgian separatist states of Abkhazia and South Ossetia is profoundly linked to the Russo-Georgian conflict, as Mr Irakli Menagarishvili, the Georgian Minister of Foreign Affairs between 1995 and 2003 explains:

> In August 2000 or 1999, through Yeltsin, he [Vladimir Putin] asked to allow Russian troops to approach Chechnya, also from the South, but the only way to do this is to do this was through Georgian territory. … I was foreign minister at the time, but we the Georgian side, finally said no. The reason was we would have been dragged into the war with the Chechens, which was totally unacceptable for us, especially at that time, when we had almost already shaped up our strategic orientation. … The Russians were furious. … I believe strongly that these two developments are tied to each other. The

[390] Interview with Ambassador Tedo Jeopardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/

> first punishing step was Russia's statement in November, or December 1999 imposed the need of a visa regime to enter Russia for all Georgian citizens. … Russia just declared that there was a decision of the security council of the Russian Federation to introduce visas for Georgian citizens, in a strange way. Those living in South Ossetia and Abkhazia they remained free of this law. They could use non-visa entry right into Russia. I think you understand what it means, a very simple and transparent step to impose a punishing and retaliatory step. … Tense negotiations took place in Moscow. Finally, we signed these papers, formally refusing this condition for the Abkhaz, not for the Abkhazian nationals, but for those living in Abkhazia. Russia did not care. They had made their decision, and they allowed them to enter Russia without visas. Either Soviet passports … or some from the governments from Abkhazia and South Ossetia. … It is clear that these were the initial steps towards the offering the Russian passports to them.[391]

In Georgia, 23,521 ethnic Russians make up 10.9 per cent of the population of Abkhazia and identify themselves as such.[392] No official census has been conducted in South Ossetia since 1989; however, the Ministry of Foreign Affairs of the Russian Federation estimates that 2,100 people or approximately three per cent of the South Ossetian population also identify themselves as ethnically Russian.[393] These statistics are relevant as these groups of the breakaway states have had Russian citizenship conferred upon them. By 2002, the Abkhazian population with Russian citizenship stood at around 30 per cent or roughly 63,000 people, with 40 per cent in South Ossetia holding Russian citizenship. The vast majority of those receiving Russian citizenship at the earlier stages of the extraterritorial naturalisations process were ethnically Russian.[394]

The extraterritorial naturalisations of the Abkhaz and South Ossetian population are primarily contingent on the relationship these populations had with their legal sovereign, Georgia. Since the breakup of the Soviet Union, the two regions were pressing for independence. Accordingly, many within the population rejected the Georgian state's offer of

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[391] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs between 1995 and 2003, on 13 June 2019 in Tbilisi, Georgia. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/

[392] Abkhaz Ministry of Foreign Affairs in Giorgi Gogia, *Living in Limbo: The Rights of Ethnic Georgian Returnees to the Gali District of Abkhazia* (Human Rights Watch, 2011).

[393] Ministry of Foreign Affairs of the Russian Federation, "Republic of South Ossetia " The Russian Federation.

[394] Juhan Kivirähk et al., *The «Humanitarian Dimension» of Russian Foreign Policy toward Georgia, Moldova, Ukraine, and the Baltic States* (Riga, Latvia: Centre for East European Policy Studies, 2009).

Georgian citizenship, effectively leaving a significant number stateless. The ethnic Russians, in Abkhazia and South Ossetia respectively formed tight-knit communities and were keen on receiving Russian, as opposed to Georgian, citizenship.

> Although there were not many of them, you could tell who they were because they spoke Russian, were very proud of Russia and often lived together near each other in the towns, so the Russian's just had to offer them the passport which most of them wanted anyway. You have to understand that we [the Abkhazians] did not want to be part of Georgia. Yes, it is a problem now we are so close with Russia, but it is not that we were first Georgians and now Russians.[395]

Extraterritorial naturalisations in these regions were conducted in Russian consulates or offices relating to the Russian Federation, which accepted applications from Abkhazian and South Ossetian ethnic Russians.

Crimea – 1992 to 2014

In Crimea, the number of ethnic Russians is considerably higher than in Abkhazia and South Ossetia; 1,450,394 people or 58.3 per cent of the population of Crimea identify themselves as *Russki*.[396] Before the 2014 military invasion of Crimea and its annexation, the Russian Federation conducted extraterritorial naturalisation mainly to Sevastopol residents, home to Russia's Black Sea naval base. Sergiy Kulyk of Nomos Centre, Sevastopol, estimated that between the dissolution of the Soviet Union and 2014 as many as 60,000 people were naturalised by the Russian Federation, predominately pensioners connected to the Russian

[395] Interview conducted with Akaki Janashia, a former Abkhaz employee at the UN Refugee Agency in Georgia in Sam Wrighton, "The Annexations of Populations; Russian Pasportizatsiya Strategies in Abkhazia, South Ossetia and Crimea" (University of Amsterdam, 2016).
[396] The State Statistics Service of Ukraine, "Population Census," http://database.ukrcensus.gov.ua/MULT/Database/Census/databasetree_en.asp.

Black Sea Fleet.[397] Mykola Stretovych, an MP at the time for Ukraine's ruling Orange Party, described the process as a 'massive operation'.[398]

> Most of the Russians [*Russki*] who lived in Crimea lived in or near Sevastopol, because of the navy and military base there. These people in Sevastopol are almost Russian anyway and have strong connections to the military, so we knew about this happening in Crimea but did not consider this to be a problem. I do not think they ever considered themselves Ukrainian anyway, maybe Crimean but maybe Russian too even before they got their passport.[399]

The Ukrainian government in Kyiv were aware of the Russian extraterritorial naturalisations and as a result, ordered the Russian consulate in Simferopol to close in the mid-1990s, before reopening in 1999.[400] The Ukrainian government were also concerned that the Russian extraterritorial naturalisations in Ukraine would have similar consequences to those conducted previously in Georgia. The former Ukrainian Minister for Foreign Affairs, Volodymyr Ohrzko and former Ukrainian naval commander Vice-Admiral Vladimir Beskorovainyi shared concerns about the Russian naturalisations of Ukrainian citizens in Simferopol and Sevastopol.[401] The Ukrainian authorities believed and provided evidence to support the view that the Consulate General of Russia in Simferopol were conferring Russian citizenship upon Ukrainian citizens. Through diplomatic channels with Russia, the Ukrainian government enquired about the volume of the naturalisations without receiving a response.[402] Vice-Admiral Vladimir Beskorovainaya of the Ukraine navy claimed that a librarian working at the naval library in Sevastopol was 'handing them [passports] out' to Ukrainian citizens connected with the navy base.[403]

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[397] Jakob Hedenskog, *Crimea: After the Georgian Crisis* (Defence Analysis, Swedish Defence Research Agency (FOI), 2008).
[398] Adrian Blomfield, "Russia 'Distributing Passports in the Crimea'," *The Telegraph* 17 (2008).
[399] Interview with Yuri in Wrighton, "The Annexations of Populations; Russian Pasportizatsiya Strategies in Abkhazia, South Ossetia and Crimea."
[400] Taras Kuzio, *Ukraine Crimea Russia: Triangle of Conflict*, vol. 47 (Columbia University Press, 2007).
[401] Blomfield, "Russia 'Distributing Passports in the Crimea'."
[402] NewsRU, "Russia Claims It Does Not Issue Passports in Crimea," http://rus.newsru.ua/ukraine/06sep2008/passports.
[403] UNIAN, "Девушка Оля Из Библиотеки Севастополя Запросто "Выдает" Российские Паспорта?," UNIAN, https://www.unian.net/politics/139055-devushka-olya-iz-biblioteki-sevastopolya-zaprosto-vyidaet-rossiyskie-pasporta.html.

Estonia and Latvia – 1992 to present

The Russian Federation's extraterritorial naturalisations in Estonia and Latvia are conducted exclusively along ethnic lines and surreptitiously given the illegality of dual citizenship in these states. Accordingly, the numbers of those naturalised are challenging to establish; likely only the Russian Federation's Federal Migration Service (FMS) know the exact figures. In Estonia it is estimated that of the approximately 300,000 ethnic Russians in the state, 100,000 opted for Estonian citizenship, a further 100,000 decided to remain stateless, and 100,000 have received Russian citizenship.[404] A spokesperson at the Latvian Office of Citizenship and Migration Affairs stated, 'there is a tendency for people to try and hide the fact they are Russian citizens here in Latvia.' [405] The Latvian Office of Citizenship and Migration Affairs' official figures suggest that the extraterritorial naturalisations of ethnic Russians in Latvia have continued at a steady rate, from approximately 27,380 in 2007 to 55,440 in 2017.

State officials of Estonia and Latvia recognise the practice as an ongoing problem for the two Baltic states. The majority of the naturalisation procedures occurred from Russian consulates and embassies in the two states. One interviewee recalled that his extraterritorial naturalisation was conducted by a Russian official from the consulate office in Narva in the official's private home.

> The passport issuing office was open at the Tallinn Officers' house, you had just to submit an application form on a sheet of paper, and a passport was issued in a matter of days. …The rules for obtaining Estonian citizenship were very difficult … Russian citizenship was provided very simply. It was enough to submit an application form right in the house of the officers, the current Russian cultural centre. There were tables. Pensioners worked behind them, in queues of 3 or 4 streams, passports were issued at a breakneck pace.[406]

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[404] Personal interview with Latvian Ministry of Interior –The Office of Citizenship and Migration Affairs in Riga, Latvia on 7 May 2019. See Interview_ID_06_Latvian_OCMA at https://reshare.ukdataservice.ac.uk/854598/

[405] Ibid.

[406] Personal interview with a naturalised Russian citizen, Serebrov Yegorovic in Narva, Estonia on 6 June 2019. See Interview_ID_53_Serebrov_Yegorovic at https://reshare.ukdataservice.ac.uk/854598/

The extraterritorial naturalisations of the populations peaked at a critical juncture in Russian domestic legislation. Many of the Estonian and Latvian ethnic Russians who had initially hesitated in taking Russian citizenship and who were rejected, or were not eligible, for the citizenship of their 'home state' decided to take Russian citizenship in order to claim Russian pensions, as these were paid earlier than those in the Baltic States. Nevertheless, nearly every politician or state official I interviewed in the Baltic States framed Russian extraterritorial naturalisation as a national security issue. For instance, the Office for Citizenship and Migration Affairs within the Latvian Ministry of the Interior suggested, 'prohibiting Latvian-Russian dual citizenship is a legislative, regulatory approach connected to the national security interest of Latvia.'[407] Karlis Pantelejevs at the Latvian Ministry of Foreign Affairs agreed with this position.

> We do not consider the Russian population in Latvia to be a national security threat; this would be a bad way to approach the issue. That being said, there are approximately 240,000 non-citizens in Latvia who are more connected to the Russian way of thinking and to the Russian Federation. Of course, there are security implications to this, and it is for this reason, along with some other principled reasons relating to emotion and history, that we cannot simply grant all these people with Latvian citizenship instantaneously. We are also aware that there are a number of the population who have both non-citizen passports and Russian Federation passports. We have heard estimates of around 50,000; however, with no accurate data, it is impossible to verify this.[408]

While state officials in The Baltic states, Ukraine and Georgia have all suggested that more needs to be done to assess the impact of Russian extraterritorial naturalisation, they have also highlighted some complexities in doing so.

> According to the latest official information from the Office of Citizenship and Migration Affairs, there are 53,934 citizens of the Russian Federation residing in Latvia. However, Latvia's authorities are aware that there is a group of persons - Latvian citizens or Latvian non-citizens (former USSR citizens who do not have the Citizenship of Latvia or that of any other state) that have acquired Russian Federation's citizenship and have not renounced their Latvian citizen or non-citizen status, as they are legally obliged to do (Latvian law does not allow for dual citizenship with the

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[407] Personal interview with Latvian Ministry of Interior –The Office of Citizenship and Migration Affairs in Riga, Latvia on 7 May 2019. See Interview_ID_06_Latvian_OCMA at https://reshare.ukdataservice.ac.uk/854598/

[408] Personal email correspondence with Karlis Pantelejevs – Latvian Ministry of Foreign Affairs on 7 May 2019. See Interview_ID_07_Karlis_Pantelejevs at https://reshare.ukdataservice.ac.uk/854598/

> Russian Federation). However, there is no feasible data available on this, as the Russian Federation does not disclose this information to the Latvian authorities. This attests to Russian Federation's ambiguous policy towards Latvia, as, from one hand, it continually calls upon Latvia – including international organisations – to facilitate the naturalisation into Latvian citizenship of non-citizens; on the other hand, it grants Russian Federation's citizenship to non-citizens.[409]

Transnistria - 1992 to 2014

In 1995, the Transnistrian authorities, like their counterparts in Abkhazia, South Ossetia, and Donbas, issued the population residing in the breakaway territory Transnistrian 'citizenship' and Transnistrian passports and passed legislation that allowed for the population to apply for and receive dual citizenship for other states. Of the 555,000 people residing in Transnistria, approximately 90% have 'Transnistrian' citizenship.

By 2001, the Russian Federation naturalised 65,000 of the total population of Transnistria, roughly 12% of the total population.[410] In 2004, the former president of Transnistria, Igor Smirnov, stated that 100,000 of his population had received Russian passports, but the pace was insufficient to meet demand.

> The number of those who want to receive [a Russian] passport immeasurably exceeds the capacity of the Russian embassy in Kishinev [Chisinau]. They issue fewer than 2,500 passports per year. We think, if things go at this pace, it will take 100 years to eliminate the line![411]

By 2007, 110,00 had received Russian passports, with another 12,000 waiting that had applied.[412] By 2010, the number had increased to 150,000[413] moving towards 200,000 in 2014.[414] Unlike the extraterritorial naturalisations conducted by Russia in Estonia and Latvia,

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[409] Ibid.
[410] Mikhail Vinogradov, "Мы Сделаем Без Признания. Кишинев И Тирасполь Решили Вернуться К Столу Переговоров," Izvestiia.
[411] Sankt Peterburgskie Vedomosti, "Приднестровье - Головная Боль Москвы," Sankt-Peterburgskie vedomosti.
[412] Aleksei Matveev, "Украина Участвует В Блокаде," VPK News.
[413] Svetlana Gamova, "Медведев И Янукович Откроют Приднестровье," Nezavisimaia gazeta.
[414] Karin Afanas'eva and Evgenii Shevchuk, "Приднестровье Не Намерено Атаковать Украина," Tribuna no. 31.

there were no official offices or consulates on the territory and therefore received and processed the naturalisation applications at the Russian embassy in Chisinau.

Military presence and scaling up extraterritorial naturalisations – the 'second wave'

The extraterritorial naturalisation practices conducted by the Russian Federation in Abkhazia, South Ossetia, Crimea, and Donbas during a 'second wave' of the practice is characterised by the presence of the Russian armed forces - whether uniformed or not - as well as the large scale and rapid nature of the practice. As head of the CIS, the Russian Federation had troops, somewhat controversially, stationed in the two breakaway regions of Abkhazia and South Ossetia fulfilling their role as peacekeepers in Georgia during the conflict relating to the two secessionist states' aspirations for independence from 1992 onwards.[415] The Russian Federation's armed forces, also played a significant role in the extraterritorial naturalisation process in pre-annexation Crimea, albeit less overtly. Likewise, in Donbas, Eastern Ukraine, aside from the broader conflict between the Ukrainian state and the Russian Federation, the Russian armed forces, and rebel groups closely associated with Russia, played a significant role in the extraterritorial naturalisation of some of the population in the region. Unlike the previous wave of extraterritorial naturalisations, ethnicity was not a salient factor, as the widespread and inclusive nature of the practice was focused on geography and volume.

[415] Gearóid Ó Tuathail, "Russia's Kosovo: A Critical Geopolitics of the August 2008 War over South Ossetia," *Eurasian Geography and Economics* 49, no. 6 (2008).

Abkhazia and South Ossetia – 2002 to 2008

The Russo-Georgian conflict began on 7 August 2008; however, before this intense escalation in military intervention, Russian troops were stationed in the breakaway states as peacekeeping forces, since the collapse of the Soviet Union in 1992. In Abkhazia, approximately 3,000 Russian peacekeeping forces were stationed in the region. As part of the CIS South Ossetia Joint Peacekeeping Force (JPKF), troops from South Ossetia, North Ossetia, Russia and Georgia were stationed here. Reports suggest that the Russian military supported the Russian Foreign Migration Service's extraterritorial naturalisation practises;[416] this was a clear breach of the international protocol requiring neutrality in the peacekeeping forces.[417] In 2003, the Georgian authorities intercepted a Turkish ship bound for Sochi with 25,000 blank Russian passports printed in Russian and Abkhaz languages.[418] Tedo Japardize, Former Georgian Minister of Foreign Affairs, said 'passportization was, as we say, was a fact on the ground, we knew that it existed. We knew that Ossetians and Abkhazians had Russian passports.'[419] The number of people with Russian citizenship increased sharply; in Abkhazia, from 30 per cent in 2002 to 80 per cent in 2006. In South Ossetia, those with Russian passports increased from 40 per cent in 2002 to 90 per cent in 2006.[420] The second wave of the Russian extraterritorial naturalisation process in Abkhazia and South Ossetia was conducted with local and regional officials' assistance. In Abkhazia, the expedited process was conducted from 33 distribution centres with a significant military presence in the form of

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[416] Mühlfried, "Citizenship at War: Passports and Nationality in the 2008 Russian-Georgian Conflict."
[417] Kristopher Natoli, "Weaponizing Nationality: An Analysis of Russia's Passport Policy in Georgia," *Boston University International Law Journal* 28 (2010).
[418] The Central Asia -Caucasus Analyst, "Georgian Authorities Find 25,000 Blank Russian Passports on Turkish Ship," http://cacianalyst.org/publications/news-digest/item/8237-news-digest-caci-analyst-2003-7-11-art-8237.html.
[419] Interview with Ambassador Tedo Jeopardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/
[420] Kivirähk et al., *The «Humanitarian Dimension» of Russian Foreign Policy toward Georgia, Moldova, Ukraine, and the Baltic States*.

the Russian peacekeeping forces.[421] This process involved cooperation from local community leaders in the regions.

> Since 1 June [2002], the public organisation, the Congress of Russian Communities of Abkhazia, has been collecting Abkhazians' Soviet-era travel documents. It has sent them to consular department specially set up by Moscow foreign ministry officials in the city of Sochi, on the Black Sea coast just north of the breakaway region. When they have been checked, they are returned with a new page inserted certifying Russian citizenship.[422]

The Georgian Foreign Minister at the time of the Russian extraterritorial naturalisations in Abkhazia and South Ossetia, Irakli Menagarishvili, explained the process and Georgian response to the practice in a personal interview:

> [The] Congress of Russian Communities or Representatives of Union Russians in Abkhazia …allowed them to open special offices to take applications from Abkhazia and in Tskhinvali from Ossetian inhabitants. They were, of course, Georgian citizens, but nevertheless with Soviet passports and [the Congress of Russian Communities or Representatives of Union Russians in Abkhazia] provided them with Russian passports. Technically everything was formalised on the Russian territories by several different state offices, most probably the police offices, but the direct contact with locals was led by these so-called semi-formal representatives, it had nothing to do with the Russian foreign office or diplomatic services. [423]

Two years before Russia's recognition of Abkhazian independence, the Abkhazian officials had issued its own form of identification documentation in the form of an Abkhazian passport.[424] Immediately before the 2008 Russian-Georgian conflict, the South Ossetian and Abkhazian authorities, both backed by the Russian Federation, began issuing their passports

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[421] See Appendix H, Wrighton, "The Annexations of Populations; Russian Pasportizatsiya Strategies in Abkhazia, South Ossetia and Crimea."
[422] Inal Khashig, "Abkhaz Rush for Russian Passports," Institute for War and Peace Reporting, https://iwpr.net/global-voices/abkhaz-rush-russian-passports.
[423] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[424] Tagliavini, "Independent International Fact-Finding Mission on the Conflict in Georgia."

in August 2006[425] and April 2007[426] respectively. These documents became mandatory for all those who resided within the territories. Eventually, they could be used as proof of identity to receive Russian citizenship and a passport.[427] In 2008, the Georgian authorities confiscated a car full of blank Russian passports. [428]

Given that the independence of Abkhazia is recognised only by Russia, Nicaragua, Venezuela and Nauru, the Abkhazian and South Ossetian passports, therefore, are not widely considered to be legal documents. However, this document was used within the extraterritorial naturalisation process as a verification step in order for people to receive Russian citizenship. The Abkhazian population, reportedly queued in large numbers to receive Russian citizenship from the Russian Federation's distribution centres in the region.[429] Tengiz Pkhaladze, Advisor to the President of Georgia and the Secretary for Foreign Affairs, explained the process:

> Today Tskhinvali and Abkhazia they are occupied, they are officially recognised by Russia as independent. When the passportization process was underway, both territories were recognised by Russia as an integrated part of Georgia and Russia was peacekeeping. … Despite the fact that they recognise the independence of Georgia and territorial integrity, they introduced consular points in the process, directly engaged by the MFA (Ministry of Foreign Affairs) of Russia. … I have this short summary of this [passportization] process. Mobile groups travelled from village to village, giving the passport to the population. … the absolutely identical scenario was repeated in Crimea. … They opened a so-called mobile point, consular points on the occupied territories on uncontrolled territories without the permission of [the] host country. According to international law, if you are going to open consular point of any representative, you need [the] permission of the host country.[430]

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[425] Civil Georgia, "Tskhinvali Begins Issuing South Ossetian Passports," https://old.civil.ge/eng/article.php?id=13314.
[426] Zaza Jgarkava, "Abkhazian Passportization & the New Criminal Residents of the Region," Georgia Today, http://georgiatoday.ge/news/11122/Abkhazian-Passportization-%26-the-New-Criminal-Residents-of-the-Region.
[427] Khashig, "Abkhaz Rush for Russian Passports".
[428] Ibid.
[429] Ibid.
[430] Personal Interview with Tengiz Pkhaladze - Advisor to the President of Georgia and the Secretary for Foreign Affairs in Tbilisi, Georgia on 11 June 2019. See Interview_ID_27_Tengiz_Pkhaladze at https://reshare.ukdataservice.ac.uk/854598/

Crimea – 2014 to 2015

It is important here to note that the inclusion of the naturalisation of the Crimean population in 2014 in an account of Russian extraterritorial naturalisation practices might be contentious given these preceded an annexation by the Russian Federation of the peninsula, legally part of Ukrainian sovereign territory. However, it is imperative to include this, for three reasons: first, the annexation of Crimea has mostly been considered illegal by the international community.[431] Second, the mechanisms involved in the practice's operationalisation display close similarities to those conducted in Abkhazia and South Ossetia previously and Donbas subsequently. Third, the naturalisation of the Crimean population *en masse* was an integral part of the annexation process, rather than running parallel to it.[432] To avoid contention, for this subsection, I will avoid using the term extraterritorial when referring to the naturalisations in Crimea.

The naturalisations by the Russian Federation of the Crimean population were, as in Abkhazia and South Ossetia, coupled with a military presence and involvement in the process. In February 2014, un-uniformed, armed Russian soldiers took effective control of the Crimean Peninsula by forming military checkpoints controlling entry and exit. The Russian Federation denied involvement, until on 1 March 2014, the Russian State Duma passed legislation to use Russian military force within Ukraine.[433] On 11 March 2014, Crimea's regional parliament declared Crimea would become independent of Ukraine.[434] The Russian Federation accepted this statement of independence, thereby recognising Crimea as an independent state and announced a referendum would occur in Crimea on 16 March 2014;

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[431] Thomas D Grant, "Annexation of Crimea," *American Journal of International Law* 109, no. 1 (2015).
[432] Wrighton, "Authoritarian Regime Stabilization through Legitimation, Popular Co-Optation, and Exclusion: Russian Pasportizatsiya Strategies in Crimea."
[433] The Kremlin, "Vladimir Putin Submitted an Appeal to the Federation Council," http://www.kremlin.ru/events/president/news/20353.
[434] Haroon Siddique and Alec Luhn, "Ukraine Parliament Delivers Ultimatum to Crimea over Referendum," The Guardian, https://www.theguardian.com/world/2014/mar/11/ukraine-parliament-ultimatum-crimea-referendum.

this referendum in Crimea posed the question about unification with the Russian Federation.[435] Although criticised and decried as illegal by many outside of Russia and Crimea,[436] the referendum indicated that 96 per cent of the voters favoured the unification with the Russian Federation.[437] On 21 March 2014, the Russian Federation state Duma introduced Article 4(1) of Federal Constitutional Law No. 6-FKZ, which legally incorporated the Crimean Peninsula into Russian Federal territory.[438]

Following the rapid escalation of military involvement and implementation of Russian legislation leading to the annexation of Crimea, the Russian Federal Migration Service (FMS) naturalised approximately 1.25 million Crimean residents within a month from 18 March 2014.[439] As with those in Abkhazia, and South Ossetia, this was done in a simplified, expedited process. The naturalisation process increased dramatically from 18 March 2014, from around 13,000 applications a day to 150,000 a day at its peak, at 160 offices *ad hoc*

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[435] State Council of the Republic of Crimea, "Declaration on the Independence of the Autonomous Republic of Crimea and the City of Sevastopol," https://web.archive.org/web/20140312060543/http://www.rada.crimea.ua/app/2988.

[436] Christian Marxsen, "The Crimea Crisis–an International Law Perspective," *Zeitschrift für ausländisches öffentliches Recht und Völkerrecht (Heidelberg Journal of International Law)* 74, no. 2 (2014).

[437] BBC News, "Crimea Referendum: Voters 'Back Russia Union'," https://www.bbc.co.uk/news/world-europe-26606097.

[438] Article 1. The bases and the term of acceptance to the Russian Federation of the Republic of Crimea1. The Republic of Crimea is accepted to the Russian Federation according to the Constitution of the Russian Federation and Article 4 of the Federal Constitutional Law of 17 December 2001, No. 6-FKZ 'About procedure for acceptance to the Russian Federation and educations in its list of the new subject of the Russian Federation'.
2. The acceptance bases to the Russian Federation of the Republic of Crimea are:
1) results of the all-Crimean referendum held on 16 March 2014, in the Autonomous Republic of Crimea and the city of Sevastopol on which the question of reunion of the Crimea with Russia as the subject of the Russian Federation is supported.
2) the Declaration on independence of the Autonomous Republic of Crimea and the city of Sevastopol, and also the Contract between the Russian Federation and the Republic of Crimea on acceptance to the Russian Federation of the Republic of Crimea and education as a part of the Russian Federation new subjects.
3) offers of the Republic of Crimea and the city with special status of Sevastopol about acceptance to the Russian Federation of the Republic of Crimea, including the city with special status Sevastopol.
4) this Federal Constitutional Law.
3. The Republic of Crimea is considered accepted to the Russian Federation from signature date of the contract between the Russian Federation and the Republic of Crimea about acceptance to the Russian Federation of the Republic of Crimea and education as a part of the Russian Federation of new subjects. Found at: *Federal Constitutional Law of the Russian Federation of 21 March, 2014 No. 6-Fkz. As Amended 31 July 2020*.

[439] Wrighton, "Authoritarian Regime Stabilization through Legitimation, Popular Co-Optation, and Exclusion: Russian Pasportizatsiya Strategies in Crimea."

immigration centres created by the FMS.[440] Although this process was framed as a choice for the Crimean population, the process to reject the Russian citizenship conferral was more arduous than it was to become naturalised. Official Russian documentation on the Russian citizenship rejection process suggested the 31 FMS offices on the peninsula processed these requests. However, sources suggest only four or five locations were processing these requests.[441] There were also widespread reports of intimidation by the Russian forces during the process. Significantly, in order to reject Russian citizenship, the applicant needed to acknowledge that 'Crimea is an integral part of the Russian Federation' and that the applicant 'acknowledges that he is henceforth considered as a foreigner on the Crimean territory, with all of the ensuing consequences'.[442] Those that rejected Russian citizenship had to subsequently apply for residency permits and for those who could not process the rejection in time had Russian citizenship conferred upon them automatically.[443] Therefore structural coercion in the form of direct and indirect penalties for those refusing to accept Russian citizenship was a common feature of the process.[444]

Donbas – 2014 to present

The breakaway separatist regions of Luhansk and Donetsk collectively form the region, Donbas. The authorities in partial control of these regions, as with those in Transnistria, South Ossetia, and Abkhazia are under *de facto* control of Russia. On 16 March 2016, the Donetsk

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[440] Oxana Shevel, "The Aftermath of Annexation: Russia and Ukraine Adopt Conflicting Rules for Changing Citizenship of Crimean Residents (Updated)," *European Union Democracy Observatory on Citizenship, last update* 16 (2014).
[441] Wrighton, "Authoritarian Regime Stabilization through Legitimation, Popular Co-Optation, and Exclusion: Russian Pasportizatsiya Strategies in Crimea."
[442] Unrepresented Peoples and Nations, "Interview with Mustafa Dzhemilev: Crimea One Year under Russian Occupation," https://unpo.org/article/18003.
[443] Halya Coynash, "Russian, or Else: On How Russia Is Foisting Its Citizenship in Crimea," (2014).
[444] Wrighton, "Authoritarian Regime Stabilization through Legitimation, Popular Co-Optation, and Exclusion: Russian Pasportizatsiya Strategies in Crimea."

People's Republic (DPR) authorities began issuing DPR passports.[445] These 'passports', like these issued by the Abkhaz authorities, do not function as an internationally recognised passport but allowed for visa-free travel to Russia. For the Russian Federation, 'the distribution of local passports led to the spread of Russian passports.'[446] It facilitated the extraterritorial naturalisation procedure for the holders, as they were able to exchange or present these documents, to receive Russian citizenship and documentation.

> They [Russia] spend a lot of effort trying to promote it [extraterritorial naturalisation]. We have reports that they are even arranging for people to take a bus from places in Donbas to Russia, just to get a Russian passport. They organise tours. With Russian soldiers, they bring people in to apply for a passport and return them back. It is very organised in a very efficient manner. To allow as many people as possible to use these opportunities.[447]

For the Russian authorities, the use of these passports is similar to that of the internal passport used by the Soviet Union authorities, in that it demarcates the population to be naturalised.[448] The Hungarian 'ethnic card' provided Hungary with a similar mechanism.

Georgiy Tuka, the current Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons and governor of Donbas at the time of the beginning of the conflict, explains the process in a personal interview.

> Russia openly advertises the ability to obtain Russian passports on the territories of DPR and LPR (Luhansk People's Republic). But in order to maintain some outer norms and rules, they will give out the passports not in LPR and DPR but in the Rostov region on Russian territory.[449]

He continues,

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[445] Agnia Grigas, "Separatists Launch New "Passportization" Strategy in Eastern Ukraine," Atlantic Council, http://www.atlanticcouncil.org/blogs/new-atlanticist/separatists-launch-new-passportization-strategy-in-eastern-ukraine.
[446] Ibid.
[447] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine In Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/
[448] See Figure 8 on page 147
[449] Personal Interview with Georgiy Tuka - Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons in Kyiv, Ukraine on 6 June 2019. See Interview_ID_17_Georgiy_Tuka at https://reshare.ukdataservice.ac.uk/854598/

> When the DPR and LPR were established, they took under their wing the most fragile section of people, mainly teenagers. The just started receiving their passports, and they issued them local passports. … The first step was to issue passports to the militia and local bureaucrats and local power entities, and the army of so-called first and second army corpuses *[sic]*. The second stage was business. In order to have any business on occupied territories, it was mandatory to have a DPR or LPR passport. They were considered equal to a Russian passport. … It was not a surprise for the Ukrainian side, as our security noted this, and Russia was preparing for this process for half a year at least. … In the Donetsk region, in the occupied part, we can still see queues for people waiting to get a Russian passport. According to our information, the power entities of DPR, on purpose made less *[sic]* points where it is possible to get these passports, to artificially make the queues, to provide propaganda to show this a sign that people eagerly want to get a passport. … They have two aims, two goals. The first one, in the administration of two republics, they manipulate with population figures to make them larger, to get more money from the Russian Federation. During this [proposed upcoming] census they are going to make a so-called verification of pensioners. They are going to make it mandatory for [the] elderly to exchange Ukrainian passports for DPR and LPR passports, which can then be exchanged for Russian passports. [450]

Foreign Policy Advisor to President Zelensky of Ukraine, Bohdan Yaremenko, stresses that the extraterritorial naturalisations of some of the Donbas population were not conducted along ethnic lines. 'It has never been and will never be an ethnic issue.'[451]

On 18 February 2020, Chief of Ukraine's Permanent Mission to the United Nations, Ambassador, Sergiy Kyslytsya, at a United Nations Security Council meeting in New York, said, 'Russia also pursues illegal passportization in the temporarily occupied territories of Donbas, which has now reached an industrial level – more than 125,000 persons were issued Russian passports there.' [452] While the German envoy, Mr Heusgen stated 'the Acting Head of the General Administration for Migration Issues of the Ministry of Internal Affairs of Russia, Ms Valentina Kazakova, Russia has issued Russian passports to the 227,000 inhabitants of the separatists' territories.'[453]

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[450] Ibid.
[451] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine In Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/
[452] United Nations Security Council, "8726th Meeting Tuesday, 18 February 2020, 3 P.M New York, US," (2020).
[453] Ibid.

The Russian extraterritorial naturalisations in Donbas have created difficulties for the Ukrainian state, as they plan to resolve the conflict. Those interviewed for this thesis point at Russian state coercion and implications are profound regarding how the state treats those who received Russian citizenship.

> How would you treat the citizens in Crimea or in Donbas who applied for Russian citizenship? Was it voluntarily or not? Without the Russian citizenship in Crimea, you cannot apply for work, you cannot send your children to school you cannot use the hospitals. Basically, all services are provided only to the Russian citizen. You would not be eligible for all those services if you are a Ukrainian citizen. Over there, [in Donbas] it is pretty much the same, if not official, but on the level of the practical policies.[454]

Hungary

Hungary's extraterritorial naturalisations in their contiguous states can be grouped into two categories: open and clandestine. The factor that splits the extraterritorial naturalisation practices into these two groups is the domestic legislation on dual citizenship. The extraterritorial naturalisation practice within states that prohibit or discourage citizens from adopting another citizenship has been conducted opaquely (within Slovakia and Ukraine). In contrast, in the states which allow dual citizenship, these have been conducted openly (Romania), or have even been promoted by the 'home state' (Serbia). The following sub-sections of this chapter explain how the process was operationalised in practice. Table 2 below details the naturalisations conducted by Hungary since 2010 by the total naturalised as well as the percentage of the eligible population that were naturalised.

[454] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine in Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/

Table 2. Numbers and percentages of the naturalised Hungarian population[455]

Other Citizenship	Total naturalisations	% of the applicants to the local Hungarian population
Romania	492,065	40
Serbian	153,911	60.60
Ukrainian	150,620	96.20
Slovak	2,906	0.60
Other	19,700	n/a
Total	**819,193**	**n/a**

Open extraterritorial naturalisation

There are two states in which Hungary conducted large-scale collective extraterritorial naturalisation practices at a transparent and open manner, Romania and Serbia. These two states have the largest and third-largest population eligible for Hungarian citizenship, respectively. In each case, the 'buy-in' from the eligible population has been significant, resulting in a large proportion becoming naturalised Hungarian citizens. Although the processes in these two states are similar, there are vital differences involving the two states' political institutions explained below.

Romania

The extraterritorial naturalisation process in Romania was conducted in a simplified and expedited manner. Applicants were encouraged by the local Hungarian media and ethnic Hungarian political parties to begin the application process at any Hungarian diplomatic mission in Romania, either at the Hungarian embassy in Bucharest, or the Consulate Generals

[455] Source Hungarian Office of immigration and nationality. Found in Pogonyi, *Extra-Territorial Ethnic Politics, Discourses and Identities in Hungary*.

in Cluj-Napoca or Miercurea Ciuc. The ethnic Hungarian political parties in Romania also assisted in compiling applications to be processed. The applicants were required to prove two prerequisites: first, that they have ethnic Hungarian ancestors, or ancestors born on the territories belonging to the Kingdom of Hungary before the border revisions as a result of the Treaty of Trianon. Second, they must prove 'knowledge of the Hungarian language,' during a short verbal interview with the immigration officers. Once the application has been submitted and approved, the applicant receives a Hungarian passport in a matter of months, as opposed to years that it took previously. Crucially, there is no cost attached to obtaining Hungarian citizenship and a Hungarian passport.[456]

Unlike the extraterritorial naturalisations in Slovakia and Ukraine that were accompanied by protestation from these states' officials, the Romania state appeared to have no problem with the practice. 'We have no objections to the Hungarian law making it easier to grant Hungarian citizenship to ethnic Hungarians living abroad', said the Romanian president at the time of the naturalisations, Traian Basescu. [457]

Serbia

In Serbia, a similar process to that within Romania was implemented, with similar prerequisites. Applicants could submit their applications at the country's Hungarian diplomatic missions, either at the Hungarian Embassy in Belgrade or at the Consulate-General in Subotica, Vojvodina. The ethnic Hungarian political party, the Alliance of Vojvodina Hungarians (VMSZ), also assisted in processing naturalisation applications. The far-right

[456] See Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[457] Diplomacy & Trade, "Romania Backs Hungarian Citizenship Law," https://dteurope.com/politics/romania-backs-hungarys-ethnic-citizenship-law/.

Hungarian political party, Jobbik, also began facilitating in naturalisations, after the political ally of Fidesz, VMSZ, began doing so.[458] A political journalist from Novi Sad, explains the process:

> For people to be eligible, they had to prove that they had ancestors from parts of Serbia that were formerly belonging to the Kingdom of Hungary's territory before 1918, or between 1941 and 1944 from Bačka and Baranja. They also had to attend an interview to ensure they could speak the Hungarian language. It has had an indescribably large impact. It is probably the most crucial aspect of contemporary history for Hungarians living in the region. Those who had ancestors living in the territories formerly belonging to the Kingdom of Hungary were given citizenship, free of charge, by knowing a little Hungarian. Not a difficult test but a short interview; this was done at the consulates and embassies.[459]

The Serbian authorities not only tolerated the extraterritorial naturalisation practices within their territory, as the Romanian officials had done but actively campaigned alongside political figures from the VMSZ and Fidesz.[460]

Some reports suggest not only *Magyar* received Hungarian citizenship in Vojvodina.

> [During the extraterritorial naturalisation process] there were Serbs who applied, and some got in. Some got rejected. But those that were rejected were simply told to learn some Hungarian and come back. The media was told to spread the word that this was a massive opportunity to take. Orbán made countless speeches about the dual-nationality law, and the campaign was intense. ... The process was very quick. I got my passport in one or two weeks. ... This year there has been a change, meaning that we can now receive Hungarian ID cards which used to be tied to a residential address in Hungary; this means I can now get credit in Hungary and am no longer any different to the Hungarians living in Hungary.[461]

[458] Personal interview with an anonymous political journalist from Vojvodina in Subotica, Serbia on 30 May 2017. See Interview_ID_44_Subotica_Journalist at https://reshare.ukdataservice.ac.uk/854598/
[459] Personal interview with Norbert Šinković, a political journalist in Novi Sad, Serbia on 30 May 2017. See Interview_ID_45_Norbert_Šinković at https://reshare.ukdataservice.ac.uk/854598/
[460] Personal interview with an anonymous political journalist from Vojvodina in Subotica, Serbia on 30 May 2017. See Interview_ID_44_Subotica_Journalist at https://reshare.ukdataservice.ac.uk/854598/
[461] Personal interview with anonymous Vojvodina Hungarian radio journalist in Novi Sad, Serbia on 29 May 2017. See Interview_ID_42_Radio_journalist at https://reshare.ukdataservice.ac.uk/854598/

Clandestine extraterritorial naturalisation

Slovakia

In 2010, as mentioned previously, Slovakia introduced counter-legislation prohibiting its citizens from becoming dual nationals.[462] This Slovakian legislation implemented soon after Hungary passed legislation permitting extraterritorial naturalisations reduced the numbers undertaking the naturalisation process. Attila Lancz, member of an ethnic Hungarian political party in Slovakia, stated, 'the Slovakian government have assessed the situation and realised they had reached their goal, the Hungarians cannot apply in big numbers for citizenship.'[463] However, this legislation did not eradicate the practice,

> They [Slovakians] do it [become naturalised Hungarians], but there is a risk because the Slovakian law states that if a Slovakian citizen acquires another citizenship, voluntarily, they will lose their Slovakian citizenship immediately. That hinders many to apply for Hungarian citizenship. By law, it is very interesting that they did not require documents to prove it. They do not require or proof of another citizenship. There are some problems with the administration. If they just state they have another citizenship, just declaring it is enough to consider them not a Slovakian citizen. [464]

It is difficult to assess the numbers involved as these were defined by many interviewed in Hungary as 'state secrets.'[465] However, the number of former Slovakian citizens to subsequently lose their citizenship after taking Hungarian citizenship is publicly available. However, those taking Hungarian citizenship and not announcing this to the Slovakian authorities are thought to be much larger.

> The Slovak state has maybe 5000, 10,000 citizens who are de jure, not citizens of Slovakia but de facto they are. .... It [Slovakian counter legislation] did not prevent

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[462] Pytlas, "Radical-Right Narratives in Slovakia and Hungary: Historical Legacies, Mythic Overlaying and Contemporary Politics."
[463] Personal interview with Attila Lancz, Member of SMK in Bratislava, Slovakia on 22 June 2017. See Interview_ID_51_Attila_Lancz at https://reshare.ukdataservice.ac.uk/854598/
[464] Personal interview with the Legal Advisor to the Hungarian Ministry of Foreign Affairs in Budapest, Hungary on 16 May 2017. See Interview_ID_33_Legal_Advisor_Hungarian_MFA at https://reshare.ukdataservice.ac.uk/854598/
[465] See interviews with state officials in Hungary at https://reshare.ukdataservice.ac.uk/854598/

> Hungarians to apply for citizenship; they only did it just hiddenly, not in a transparent way.[466]

This counter legislation meant that the recently naturalised had to hide proof of their Hungarian citizenship from the Slovakian authorities.

> The only people that would have the data are probably in Budapest the Ministry of Foreign Affairs, but it is very sensitive data because they know those that admit to taking Hungarian citizenship will lose their Slovak citizenship, so we do not have the data.[467]

It did not prevent the Hungarian Embassy in Bratislava or the Hungarian Consulate-General in Košice from processing these naturalisations.[468]

Ukraine

Like their Slovakian counterparts, the Ukrainian state officials were suspicious of the Hungarian state's intentions with regards to the extraterritorial naturalisations within their state. However, unlike Slovakia, which imposed clear, strict legislation prohibiting dual citizenship, the Ukrainian legislation on dual citizenship is not clear, as there is nothing in the Ukrainian constitution prohibiting dual citizenship. This ambiguity has led to variation in policing supposed violations.

> Four years ago when the war started, me *[sic]* and others were put onto a special list, so that when I tried to cross the border, I had a letter 'O' next to my name, which means a specific personal review of me and my belongings; this is how they found the second [Hungarian] passport. Every time since then crossing the border took one or two hours and one time it took six hours. … More than two hundred Transcarpathian Hungarians are on this list. … We wrote a letter to the Secret Service of Ukraine (SSU), to ask why that was … There was a reply from the SSU, saying it was a counter-separatist measure.

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[466] Personal interview with Kalman Petocz, Senior Advisor at Academia Istropolitana Nova, in Bratislava, Slovakia on 23 June 2017. See Interview_ID_49_Kalman_Petocz at https://reshare.ukdataservice.ac.uk/854598/
[467] Personal interview with Béla Keszegh, Deputy Mayor for Komárno, in Komárno, Slovakia on 26 June 2017. See Interview_ID_52_Béla_Keszegh at https://reshare.ukdataservice.ac.uk/854598/
[468] Ibid.

> I was invited to the office of the SSU here in Uzhhorod and asked to sign a letter saying I will not engage in separatist activities.[469]

The take-up of Hungarian citizenship by those in Zakarpattia was widespread and near universal.

> We have new data on the quantity of the Hungarian passports here. At the end of last year, the Hungarian government released the data, and it is 135,000 people who have Hungarian passports, but I think it could be less—about 120,000. [470]

It is important to note that ethnic Hungarians are not the only group who have received Hungarian citizenship.

> These are not just ethnic Hungarians. All you need as a document saying your ancestors lived on the territory of the former Kingdom of Hungary and you know basic Hungarian language. Now, in Uzhhorod, we can see many different Hungarian language courses offering courses to get people to this level. The exact official data is classified, so we cannot get the official numbers, but this is approximately correct. [471]

Sources in Ukraine indicated that there had been other recipients of Hungarian citizenship, '30 per cent of Ukrainians or Russians here have Hungarian passports.'[472]

> Up to 20% [of the Roma community in Zakarpattia have received Hungarian passports] and mostly these are more educated or active people, who wish to take them and their families abroad. … It was the same [for the Roma community in Zakarpattia to get Hungarian passports]. There was no discrimination. They had all the needed documents: birth certificate and proof of ancestry, photographs, old photographs. Many people have died from the Roma community, but there are still some people who lived here when it was part of Hungarian territory. [473]

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[469] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/
[470] Personal interview with Laszlo Zubanych - UDMSZ Berehove in Berehove, Ukraine on 22 May 2019. See Interview_ID_15_Laszlo_Zubanych at https://reshare.ukdataservice.ac.uk/854598/
[471] Ibid.
[472] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/
[473] Personal interview with Myroslav Horvat - Deputy City Council Uzhhorod in Uzhhorod, Ukraine on 21 May 2019. See Interview_ID_13_Myroslav_Horvat at https://reshare.ukdataservice.ac.uk/854598/

Why become a naturalised citizen?

From a purely instrumental perspective, it is arguable that dual citizens are privileged, as they can access both states' benefits while opting out of the duties of one, should they become overly burdensome. With this taken into account, it is perhaps not surprising that the take-up of citizenship conferral offers has been high. However, this 'buy-in' from the eligible populations has not been uniform. The following section will highlight the reasons for accepting another state's citizenship and conversely, why this practice has been less widespread elsewhere. Within both cases, the reasons can be categorised as either instrumental or symbolic. They are not mutually exclusive, however, and both would likely have featured in the decision-making process.

Russia

The reasons for accepting Russian citizenship vary considerably between each state in which the Russian Federation's extraterritorial naturalisation practices were conducted. These can be broadly grouped into two categories: symbolic, where emotion and identity are salient and instrumental, where material reasons dominate the decision-making process. They are not mutually exclusive and are present in differing amounts in each region.

Abkhazia and South Ossetia

The Abkhazian and South Ossetian populations initially had a choice in whether or not to receive Russian citizenship. However, as the Russian Federation's presence in the Georgian separatist states continued, the Russian and Abkhazian or Ossetian passports became mandatory to continue to reside in these secessionist states. Many of these individuals were

official stateless persons, as they largely rejected the offer of Georgian citizenship. Moreover, a large proportion of these populations held aspirations for independence, and Russia, who publicly supported these independence claims, offered them a route to this objective. Another factor that features in all of the Russian sub-cases is the route to a Russian pension through citizenship. Reports from South Ossetia and Georgia claim that these regions' newly naturalised citizens are receiving Russian pensions.[474]

There are also differences in perceptions of the Russian passport between the breakaway states in Georgia. Ambassador Tedo Japardize, Former Minister of Foreign Affairs and Georgian Ambassador to the US states:

> Ossetians are happy with their Russian passport, and there are quite strong sentiments to join the Russian Federation. … [however] passportization … was interpreted by the Abkhaz as a counterbalance to Georgia. … Ossetians and Abkhazians cannot travel abroad with their passport.[475]

Tengiz Pkhaladze suggested in a personal interview that not all of those naturalised by the Russian Federation are considered as equal to other Russian citizens.

> There are two types of citizens [in the occupied territories], Russian citizens who moved to Abkhazia after 2008. It is part of the policy of Russia to artificially change the balance of the population because Abkhazians never were in the majority in this territory. … Those people that moved from Russia enjoy full powers and full benefits of a Russia citizen, but people in Abkhazia who became Russian citizens, they are kind of limited. [476]

Those that have received Russian citizenship in Abkhazia and South Ossetia, have been described as 'second class citizens',[477] as they are not as free to work and travel in Russia as previously thought. The passports these populations receive as part of the citizenship package

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[474] Tagliavini, "Independent International Fact-Finding Mission on the Conflict in Georgia."
[475] Personal interview with Ambassador Tedo Jeopardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/
[476] Personal Interview with Tengiz Pkhaladze - Advisor to the President of Georgia and the Secretary for Foreign Affairs in Tbilisi, Georgia on 11 June 2019. See Interview_ID_27_Tengiz_Pkhaladze at https://reshare.ukdataservice.ac.uk/854598/
[477] Ibid.

from Russia are also not valid internationally. Likewise, those passports issued in Crimea are invalid outside of Russia, Nicaragua, Narau and Venezuela. Some have reported that the 'new' Russian citizens of South Ossetia, Abkhazia and Crimea are somehow inferior to others, or the passports of these regions have little practical value beyond Russian borders.[478]

Baltic States

Within the Baltic States of Estonia and Latvia, the offer of Russian citizenship has been linked with the potential for receiving a Russian pension. This instrumental factor is also coupled with a symbolic incentive, as the vast majority of those who received Russian citizenship in these states are ethnic Russians and Russian speakers.

> We have a situation where there are certain utilitarian considerations for the Russian minorities living in Latvia, where they try to get Russian citizenship in order to get certain state benefits from Russia. Pensions are one reason, for example. This tendency was mostly apparent five to eight years ago. In this time frame, I can agree that the number of Russian citizens in Latvia increased. This trend is most applicable to the group of people aged 50 to 55, those who of pension or retirement age. [479]

Speaking on the situation in the Baltic States, Tengiz Pkhaladze, highlighted the choice facing those that receive Russian citizenship.

> [The Russian] attitude is that if you accept status neutral documents, you will be punished. At the same time, they offer their passport so if people want to travel, they can use the Russian document; this was a kind of political leverage. They create the feeling that they are Russians, and they strengthen their ties with Moscow, with Russia, so this serious leverage. The passport is brings with it a Russian pension and all the benefits of being a Russian citizen.[480]

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[478] Coynash, "Russian Passports Handed out in Transnistria as "Tension Rises"".
[479] Personal interview with Latvian Ministry of Interior –The Office of Citizenship and Migration Affairs in Riga, Latvia on 7 May 2019. See Interview_ID_06_Latvian_OCMA at https://reshare.ukdataservice.ac.uk/854598/
[480] Personal Interview with Tengiz Pkhaladze - Advisor to the President of Georgia and the Secretary for Foreign Affairs in Tbilisi, Georgia on 11 June 2019. See Interview_ID_27_Tengiz_Pkhaladze at https://reshare.ukdataservice.ac.uk/854598/

State officials in Latvia claim that those accepting Russian citizenship have done some purely because of financial opportunities attached to the citizenship conferral.

> We have some citizens of the Russian Federation here [in Latvia]. The main reason for them to take Russian citizenship was to do with pensions. Around 2010 the age to receive a pension from Russia was 57 or 58, but in Latvia, it was 63. So from this point of view, non-citizens or aliens took Russian citizenship to receive a pension earlier.[481]

The lack of social cohesion or failure in integration policies is also cited as a reason for people living in Latvia to take Russian citizenship; 'for our aliens, I do not see any arguments to take Latvian citizenship.' [482] Others in the Baltic States see the Russian Federation as the protector of their human rights, 'only one state in the world is defending Russian speakers in Estonia, and this is Russia.'[483]

Ukraine

For those in Donbas, the attraction of Russian citizenship is both symbolic and instrumental, as the Russian pension provides more income than the Ukrainian state pension. 'Every month, they [pensioners] get some so-called material help, financial help from the Russian Federation. People call this a Russian pension, but legally it is not a pension. … It is nearly 2.5 thousand Hryvnias (approximately 78 EUR). [484] He argues this has created some bureaucratic problems for many of those who have received Russian citizenship in Donbas.

> The Russians want [to] give pensioners a choice: you can stay Ukrainian and get Ukrainian pension or become Russian and get only a Russian pension. In many cases, the families in Ukraine became divided, while the children live and work on Ukrainian territory, their parents live on the occupied territories because they cannot leave their property. After the moment people are forced to take only Russian passports, the chance

[481] Personal interview with Andrejs Elksniņš - Mayor of Daugavpils in Daugavpils, Latvia on 8 May 2019. See Interview_ID_08_Andrejs_Elksniņš at https://reshare.ukdataservice.ac.uk/854598/
[482] Ibid.
[483] Personal interview with Yana Toom MEP, in Tallinn, Estonia on 2 May 2019. See Interview_ID_03_Yana_Toom at https://reshare.ukdataservice.ac.uk/854598/
[484] Personal Interview with Georgiy Tuka - Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons in Kyiv, Ukraine on 6 June 2019. See Interview_ID_17_Georgiy_Tuka at https://reshare.ukdataservice.ac.uk/854598/

> for them to pass the checkpoints into Ukrainian territories will be closed. Also, they cannot get Ukrainian pensions and medical help because many of them come to Ukrainian territories to go to the hospitals. It is not so easy with Russian pensions as well, most of the people who want to get help with the material help from Russia are elderly, but from our sources in LPR, DPR and in the Russian Federation, to get Russian pension, you need to be registered on the territory of the Russian Federation. But after these people from the DPR and LPR get the Russian passport, they do not get this registration on Russian territory. As my sources say, among the local pensioners there is some confusion, as many of them are trying to sell their flats and property, just for the registration, to move to any region in Russia. The case is that there is an agreement between Russian and Ukrainian pension funds like there is between many countries in the world, that make it impossible for a person to have their pension from two states at the same time. Ukrainian citizens can get their Ukrainian pension only if they are registered on Ukrainian territories. For Russia, it is the same. So we have a position here, that a person gets a Russian passport but are still registered on Ukrainian territory because there is no registration in Russia and LPR and DPR are not Russia territories formally.[485]

Moldova

For the Transnistrian population, the draw of a Russian passport is obvious. The breakaway state's independence is only recognised by a handful of states loyal to, or dependent upon, the Russian Federation. Although a Transnistrian passport does exist, its use beyond the borders of Transnistria is negligible. Therefore, the Russian passport offers opportunities for travel abroad, particularly to the Russian Federation itself and the other former-Soviet Union states. Without the Russian Federation, Transnistria would not survive. Not only is the state a pariah within the international political system, but it is also legally part of Moldovan sovereign territory, Europe's poorest country. Russian citizenship and therefore the Russian pension was lucrative to many of those living in Transnistria.

Moreover, there are symbolic motivating factors to take Russian citizenship for the Transnistrian population, who feel an emotional, cultural and linguistic attachment to the Russian. In other words, those accepting Russian passports self-identify as Russians.[486]

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[485] Ibid.
[486] Christian Oliver, "Tiny Transnistria Becomes the Frontline in East-West Struggle," Financial Times, https://www.ft.com/content/b64d3536-bbea-11e3-a31c-00144feabdc0.

Hungary

Hungary's extraterritorial naturalisation practices have been described as 'both [an] instrumental and emotionalised institutional process.'[487] These two factors are present in the decision-making process for those eligible for naturalisation, but at differing degrees depending on the state in which they reside. The following aims to highlight the factors that explain this variance.

Slovakia

Slovakia has had the lowest take-up of Hungarian citizenship out of the four sub-cases analysed for this thesis. There are several reasons for this. First, the Slovak counter legislation, mentioned previously, reduced the numbers applying.

> The perpetrators of this Slovak law have completed their task. The main objective of this counter law was to prevent or threaten the ethnic Hungarians to apply for citizenship, and this has happened. Some 3,000 and 4,000 ethnic Hungarians in Slovakia have applied and acquired Hungarian citizenship. According to the official statistics in Bratislava, 150 have noted this. The fine is €3300.[488]

From an instrumental perspective '[the Slovakian] passport has the same value in Hungary as it is in Slovakia. It was never going to be that successful, but with the ban, they reduced the number of Hungarians in Slovakia who took it.'[489] Hungarian citizenship is not materially attractive to those who could receive it, as Slovakia is a fellow EU member state with a comparable, if not higher, quality of life and income as Hungary.

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[487] Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[488] Personal interview with Attila Lancz, Member of SMK in Bratislava, Slovakia on 22 June 2017. See Interview_ID_51_Attila_Lancz at https://reshare.ukdataservice.ac.uk/854598/

[489] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/

> The Slovakian counter legislation no doubt affected the numbers of ethnic Hungarians taking up Hungarian citizenship. However, it was not the sole reason for the lack of interest. There is a lack of material benefits this passport brings. Slovakia is in the EU too, and salaries here are slightly higher than in Hungary.[490]

In other words, 'for the Slovakians, there was no real economic advantage to take this passport, so they did not take it.'[491] Therefore, those who have decided to take Hungarian citizenship despite the potential consequences have done so because they 'have an emotional and symbolic attachment to Hungary and some who work in Hungary. But it would not have been as widespread as it was in other countries. The counter-law was effective in cutting the numbers.'[492]

Romania

Romania has the highest number of people eligible for Hungarian citizenship since the change in legislation in 2010. For those in Romania, as in Slovakia, the Hungarian passport offers little material benefit, as Romania, like Hungary, is an EU member state. The only comparative material benefit is the opportunity for visa-free travel to the US. Therefore, as with the Slovakian case, 'it was very clear that for the Hungarian communities, it is a symbolic question about citizenship.'[493] Alternatively, it was a benefit for those that wished to

[490] Personal interview with Géza Tokár, Spokesperson of the Roundtable of Hungarians in Slovakia, in Budapest, Hungary on 25 May 2017. See Interview_ID_48_Géza_Tokár at https://reshare.ukdataservice.ac.uk/854598/
[491] Ibid.
[492] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/
[493] Personal interview with Antilla Korodi - UDMR Member of Romanian Chamber of Deputies, in Bucharest, Romania on 4 June 2019. See Interview_ID_23_Antilla_Korodi at https://reshare.ukdataservice.ac.uk/854598/

move to Hungary or vote in Hungary. Therefore, there might be an 'instrumental component, but the emotional element is still there.'[494]

Serbia

The opportunities for the eligible population in Vojvodina, that came with Hungarian citizenship are perhaps obvious. As Hungary is an EU member state and Serbia not, Hungarian citizenship came with possibilities to travel and live within Hungary and the rest of the European Union member states. This not only led to large numbers of eligible ethnic Hungarian Serbians applying for Hungarian citizenship but 'many [non-eligible] Serbians actually took Hungarian lessons to get an EU passport.'[495]

Moreover, many in Vojvodina took the offer of Hungarian citizenship to gain access to funding from the Prosperitati Foundation[496] and other grants offered by the Hungarian government in Vojvodina. Officially, Hungarian citizenship is not a prerequisite, but numerous people interviewed for this thesis suggested that Hungarian citizenship is required to be able to apply for this.

Ukraine

As in Serbia, Hungarian citizenship presented significant opportunities for those eligible within Ukraine. As the citizenship presented opportunities for unrestricted work and travel in

[494] Personal interview with István Székely researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/
[495] Personal interview with Norbert Šinković, a political journalist in Novi Sad, Serbia on 30 May 2017
[496] The Prosperitati Foundation is a non-governmental, not for profit foundation founded by the Hungarian government in Vojvodina, Serbia, which provides grants to Vojvodina Hungarians. Prosperitati Foundation, "Rólunk," https://www.prosperitati.rs/rolunk.

Hungary and European Union member states and access to Hungarian funding in Zakarpattia, as with Hungarian-Serbians in Vojvodina. There was also a symbolic element to the citizenship offer,

> It was the first time in my life that my first and last name were written without a mistake. I am Hungarian. It is symbolic. I have Hungarian citizenship. It also gives me a lot of opportunities.[497]

The significant opportunities created a situation where officials in Ukraine began taking bribe payments in order to process Hungarian citizenship applications:

> The question is how large, in scale, it is [bribes for passports]. Probably a few thousand cases. It is not only speculation. Some people from the local governments have been dismissed because of this. They were accepting some applications for citizenship without really checking them.[498]

This meant that a proportion of those being naturalised did so out of purely instrumental reasons.

> They do not do this [become naturalised Hungarian citizens] to vote for Orbán as some people do, they do this to get better prospects for their work and to move to another country. I personally know people who are ethnically Ukrainian, who got Hungarian passports, without knowing the language, they just paid a bribe.[499]

Conclusion

Russia and Hungary have both systematically developed legislation to permit the extraterritorial naturalisations of their populations abroad. However, while there are apparent similarities between the two cases, there are significant differences between Russia and

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[497] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/

[498] Personal interview with István Székely researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[499] Personal Interview with Yaroslav Halas - Governor of Zakarpattia in Uzhhorod, Ukraine on 22 May 2019. See Interview_ID_16_Yaroslav_Halas at https://reshare.ukdataservice.ac.uk/854598/

Hungary regarding the timings of the legislative amendments. While Russia has primarily implemented legislative changes to the naturalisation procedure *post hoc* to conducting extraterritorial naturalisations practices to legitimate their practices, Hungary has done this before conducting the naturalisations. Law is not irrelevant to the Russian Federation, but the sequencing is different. '[Russia is] trying to be normative and they try, in every decision they make, they try to underpin this decision [to conduct extraterritorial naturalisations] with the letter of international law.' [500]

Although the processes look similar in aims and indeed in intent, there is a fundamental difference between Russian and Hungarian instances of extraterritorial naturalisations. Officially, Russia's naturalisation procedure has resulted in a citizenship regime which is broad and expansive, while Hungary's can be considered narrower and more exclusive. The prerequisite for potential applicants which is evident in both procedures is knowledge of the respective languages and is becoming the defining characteristic in the Russian instance.

Creating opportunities out of statelessness was a critical element of the Russian extraterritorial naturalisation practices, concomitant with breakaway or secessionist states. Russia has been opportunistic in offering Russian citizenship to stateless persons, whether they are in the Baltic States – who were not offered the citizenship of the state they reside in, or the breakaway states – who rejected the offer of citizenship from their legitimate sovereign authority. The following chapter will show how Russia and Hungary employ similar official state discourse and rhetoric to legitimate their extraterritorial naturalisations policies by stating legal and moral justifications for their actions.

As will be discussed in the following chapters, contemporary collective extraterritorial naturalisation, in the form employed by Russia and Hungary, has resulted in tension and controversy. Subsequently, these policies have been met with significant resistance and

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[500] Personal interview with Nikoloz Samkharadze- Parliament of Georgia in Tbilisi, Georgia on 10 June 2019. See Interview_ID_26_Nikoloz_Samkharadze_&_Giorgi_Khelashvili at https://reshare.ukdataservice.ac.uk/854598/

protestation from other states, detailed later. Both Hungary and Russia changed citizenship legislation to permit the extraterritorial naturalisations of 'their' people abroad. These amendments to naturalisation legislation resulted in a tit-for-tat counter-legislation passed by Slovakia and Ukraine respectively, prohibiting dual nationality, out of fears that the two naturalising states are engaging in irredentist politics and threatened diplomatic relationships in the region.

Despite Russia's violation of other states' sovereign territorial integrity, Vladimir Putin and Dmitry Medvedev have been keen to legitimate their actions regarding extraterritorial naturalisation through domestic legislation. When referring to claims that the extraterritorial naturalisations in Abkhazia and South Ossetia amounted to an illegal passportization attempt, Vladimir Putin asserted, **'**we did not issue passports we just accepted applications for Russian citizenship. Under Russian law, we had no right not to accept applications.'[501]

In certain instances of Russian extraterritorial naturalisations, the Russian Federation has officially recognised the documentation provided by a secessionist state's documentation before providing the individuals within these regions with Russian citizenship; this has been conducted in areas that are *de facto* under Russian control, usually with a presence of Russian peacekeeping forces.

A central aspect of the Russian extraterritorial naturalisation practices within the breakaway territories is the local authorities' use of referenda in their attempts for independence from their legitimate sovereign authorities; this has been crucial in how Russia legitimises the use of the intervention in official state rhetoric, citing these results of these referenda as proof of the secessionist state's proclamation of self-determination. In each of the breakaway regions in Georgia, Moldova, and Ukraine, referenda have been closely linked to Russian extraterritorial naturalisation practices. Figure 8 below provides a diagram of the

[501] The Kremlin, "Excerpts from the Verbatim Report of the Press Conference Following the Informal Summit of the CIS Heads of State," http://kremlin.ru/events/president/transcripts/24800.

Russian extraterritorial naturalisation process, focusing on how this is operationalised within the successionist states. Since the collapse of the Soviet Union, the South Ossetian authorities have held multiple referenda for independence, indicating high support.[502] Although the Abkhaz authorities declared independence from Georgia before holding a referendum, a constitutional referendum was conducted in 1999, asking whether the population whether the new Abkhazian constitution should be passed; this was accepted.[503] The Transnistrian authorities first held a referendum on independence in 1991 with others held in subsequent years; all these referenda showed support for independence or being annexed.[504] Within Ukraine, the Donbas authorities held a referendum on their status regarding independence from Ukraine and unification with Russia in 2014.[505]

Furthermore, the authorities in Crimea held a referendum on independence and unification with Russia in 2014, both of which showed support.[506] However, the international community view these referenda as illegitimate, partly because they are part of secession attempts, which are considered an infringement of the sovereign territorial integrity of the states involved, as well as suspecting significant manipulation and influence from the Russian Federation.[507] In each of these polls, the Russian authorities acted as observers, who given their vested interest in the regions and populations involved, cannot be assumed to be impartial.[508]

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[502] The Guardian, "South Ossetians Vote for Independence," The Guardian, http://www.theguardian.com/world/2006/nov/13/russia.georgia.
[503] Tim Potier, *Conflict in Nagorno-Karabakh, Abkhazia and South Ossetia: A Legal Appraisal* (Martinus Nijhoff Publishers, 2001).
[504] Michael Schwirtz, "Transnistria Votes on Independence," https://www.nytimes.com/2006/09/18/world/europe/18RUSSIASUMM.html.
[505] BBC News, "Ukraine Rebels Seek to Join Russia".
[506] "Crimea Referendum: Voters 'Back Russia Union'".
[507] Daniel Costelloe, "Treaty Succession in Annexed Territory," *International & Comparative Law Quarterly* 65, no. 2 (2016).
[508] Ronald J Hill and Stephen White, "Referendums in Russia, the Former Soviet Union and Eastern Europe," in *Referendums around the World* (Springer, 2014).



Figure 8. Russian extraterritorial naturalisation process within breakaway states

From the individual's perspective, Russian citizenship is deemed to be of symbolic and material benefit to those in the Baltic States, and during the first waves of the extraterritorial naturalisation practices in Abkhazia, South Ossetia, Crimea, and Transnistria. However, in later waves, instrumental reasons for accepting this passport dominated, especially as Russian citizenship became essential for residing in these regions. In Hungary, both instrumental and symbolic reasons were present. However, the differing structural conditions in each 'home state' altered this dynamic; in EU member states Slovakia and Romania – non-instrumental reasons were more salient, while in non-EU Serbia and Slovakia, the material benefits are much more pronounced.

The next chapter will examine Russian and Hungarian official state rhetoric regarding their interpretation of historical events pertaining to territorial borders, empire, the nation, and rivalries. This discourse is meaningful because it informs, justifies, and legitimates current foreign policy involving external populations and extraterritorial naturalisations.

Chapter 4: Official State Rhetoric on Extraterritorial Naturalisations

This empirical chapter provides an analysis of the official state rhetoric by Russian and Hungarian politicians regarding the history, territory, the nation, internal and external populations, and their actions in these realms. It provides an analysis of the state discourse. It demonstrates that there has been a specific and deliberate cognitive framing of issues that legitimise their subsequent actions within the territories relevant to their past empires and justifies extraterritorial naturalisations based on this deliberate historical framing.

This chapter's empirical data was collated by conducting a 'web scrape' using computer software Python, of all official public remarks made by Vladimir Putin and Dmitri Medvedev as presidents of Russia between 1999 and 2019 and Viktor Orbán as president of Hungary between 2014 and 2019. This scraped data was then uploaded to qualitative data analysis software, NVivo, and analysed by using text word searches for the key terms and synonyms relevant to the topic of this thesis; this then allowed for coding and collation of the data.

This chapter will provide an emotive analogue showing how the Russian and Hungarian discourse emphasises a sense of loss, leading to the mutually reinforcing feelings of resentment and remorse, which require rectifying. The extraterritorial naturalisations conducted by Russia and Hungary can be interpreted as a means to rectify these territorial losses or empire disintegration. Although official state discourse should be analysed cautiously, inseparable congruence theory suggests that if actions align with rhetoric, it is plausible to believe intentions also fit. Nevertheless, it is insufficient to accept state discourse without critically triangulating words with events, theory with practice; therefore, this chapter is another step in a holistic examination of the collective extraterritorial naturalisation process.

The leaders of Russia, Vladimir Putin and Dmitry Medvedev, and Hungary, Viktor Orbán, have used similar rhetoric with regards to the people, events, and territory relevant to the extraterritorial naturalisation practices. This rhetoric has been an essential aspect of the process for a variety of reasons. Firstly, it is essential for the benefit of the internal population, as naturalisation centres on aspects of nationality; nationality is a social construct always in evolution or change from both the top-down and bottom-up and therefore politicians can enter into public discourse various aspects of the membership they wish to make salient. This selectivity of national membership has a legitimating purpose, aimed mainly at the rest of the population, who may otherwise feel aggrieved that their citizenship is instantaneously expanded. Secondly, the rhetoric on extraterritorial naturalisations has previously signalled changes in legislation or policy for the wider international community's benefit, either before the modification or afterwards.

Both Russia and Hungary have used official platforms to vilify their perceived opponents through a combination of nationalistic discourse and historical reimagining, depending on the context. For instance, the Russian Federation has positioned itself against supposed Western greed, by referring to core Russian Christian orthodox values. Likewise, Hungary has demonised the European Union to justify Viktor Orbán's nationalistic policies and is rhetorically aligning with Putin's Russia by opposing the West along ideological lines. This form of rhetoric has also been present in the two states' references to empire and the disintegration, blamed on external enemies, rather than domestic influences. Russia and Hungary have framed the extraterritorial naturalisations by suggesting the practice rectifies past injustices against the two states. This chapter will show how Russia and Hungary have, in official discourse, defined the borders and contours of their nationals and Compatriots and how this informs contemporary domestic and foreign policy.

Cognitive framing of historical events and present practices

Politicians sometimes engage in rhetoric which historicises in a manner to justify immediate action. Viktor Orbán alluded to this by stating, 'in our work we politicians do not immerse ourselves in the precise data and exact factualities of the engineering world, but rather in ideas, historical analogies and speculative thought.'[509] Justifying policy is vital for two reasons: first, to convince a domestic population that the policy is necessary and worthwhile, and second, to repel international criticisms. The specific cognitive framing of historical events and current practices presented below might not directly cause the extraterritorial naturalisations, but they are essential in legitimising the practice. Nevertheless, much of the rhetoric used in the narrative surrounding the populations, territory, and nation have informed the scope conditions for the practice.

As will be detailed below, the cognitive framing logic is as follows: the head of state expresses loss or injustices faced by the nation or state and refers to an era in which the state was previously more powerful. Figure 9 provides a diagram that illustrates this emotive analogue, which is as follows: expressions of loss are related to perceptions of humiliation and blame. The loss is then attributed to an external actor. This loss is coupled with a feeling of resentment. The policy is then framed as a manner to rectify these losses and reverse the actions of the external agents and are sometimes framed as a means to punish those actors.

[509] Viktor Orbán, "Prime Minister Viktor Orbán's Eulogy at the Funeral of Etelka Barsi-Pataky. 2 March 2018," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-eulogy-at-the-funeral-of-etelka-barsi-pataky.

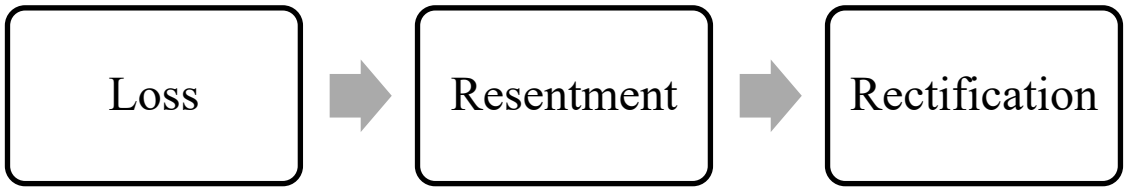


Figure 9. The 'emotive' analogue of extraterritorial naturalisations derived from rhetoric

Loss

A sense of historical loss, humiliation, injustice, trauma, and shock is a shared feature of Russian and Hungarian discourse. The following section will provide empirical data relevant to each step in the emotive analogue beginning at how official utterances made by the heads of state of Russia and Hungary can be interpreted as sentiments of loss.

Russia

In the official state discourse of the Russian Federation, the expressions of loss are directed at the disintegration of the Soviet Union. Most famously, Vladimir Putin asserted,

> we should acknowledge that the collapse of the Soviet Union was a major geopolitical disaster of the century. As for the Russian nation, it became a genuine drama. Tens of millions of our co-citizens and Compatriots found themselves outside Russian territory. Moreover, the epidemic of disintegration infected Russia itself.[510]

In subsequent statements, Vladimir Putin defended his argument by stating 'the Soviet Union's collapse was one of the largest humanitarian disasters of the 20th century.'[511] In addition to the collapse of the Soviet Union being framed as a disaster and a trauma, Putin,

[510] Vladimir Putin, "Annual Address to the Federal Assembly of the Russian Federation. 25 April 2005," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22931.
[511] "Vladimir Putin's Interview with Radio Europe 1 and TF1 TV Channel. 4 June 2014," The Kremlin, http://en.kremlin.ru/events/president/transcripts/45832.

when answering questions about whether he would defend his earlier utterance, stated: 'it is a tragedy and a great tragedy too.'[512] He further elaborated on this sentiment:

> As for the tragedy that I talked about, it is obvious. Imagine that one morning people woke up and discovered that from now on they did not live in a common nation, but outside the borders of the Russian Federation, although they always identified themselves as a part of the Russian people. And there are not five, ten or even a thousand of these people, and not just a million. There are 25 million of them. Just think about this figure! This is the obvious tragedy, which was accompanied with the severance of family and economic ties, with the loss of all the money people had saved in the bank accounts their entire lives, along with other difficult consequences. Is this not a tragedy for individual people? Of course, it's a tragedy![513]

In this statement, Vladimir Putin draws a continuous line between the history of the Soviet Union and the Russian Federation, 'the collapse of the Soviet Union was nothing less than the collapse of Russia on a larger scale and a period of serious crisis in the Caucasus.'[514] In doing so, he is suggesting the loss of the Soviet Union is a loss for Russia. 'Russia has lived through many tragic events and terrible ordeals over the course of its history. Today, we live in a time that follows the collapse of a vast and great state.'[515] For Putin, the collapse of the Soviet Union informs contemporary sentiment that underlies the policy.

The feelings of loss present in the official state discourse, are coupled with a sense of humiliation:

> Being part of a big country, the Soviet Union, we all went through the dramatic period of the collapse of our great country and the formation of new nations, including modern Russia. It was a very complicated process. Of course, everyone is free to give their own assessment: some believed that this was humiliating for a significant number of people in our great nation, others see it more positively.[516]

In Vladimir Putin's address to the UN, he reiterated and expanded on this position:

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[512] "Interview with Time Magazine. 19 December 2007 (Given 12 December 2007)," The Kremlin, http://en.kremlin.ru/events/president/transcripts/24735.
[513] "Interview with German Television Channels ARD and ZDF. 5 May 2005," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22948.
[514] "Press Statements and Press Conference with Prime Minister of Luxembourg Jean-Claude Juncker. 24 May 2007," The Kremlin, http://en.kremlin.ru/events/president/transcripts/24290.
[515] "Address by President Vladimir Putin. 4 September 2004," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22589.
[516] Dmitry Medvedev, "Interview Given to Izvestia Newspaper," The Kremlin, http://en.kremlin.ru/events/president/transcripts/7659.,

> I see the collapse of the Soviet Union as a great tragedy of the 20th century. … Twenty-five million Russian people suddenly turned out to be outside the borders of the Russian Federation. They used to live in one state; the Soviet Union has traditionally been called Russia, Soviet Russia, and it was the great Russia. They used to live in one country and suddenly found themselves abroad … Do you think it is normal that 25 million people, Russian people, suddenly found themselves abroad? ... The Russians have turned out to be the largest divided nation in the world nowadays. Is that not a problem?[517]

Along with the humiliation suffered by the peoples of the Soviet Union and Russia, is a feeling of suffering. 'The peoples of all countries in the region suffered a lot after the collapse of the Soviet Union. Many citizens of our respective countries suffered, and are still suffering, from harsh consequences and hostilities.'[518] Putin expressed a sense of sadness felt by the Russian population about the end of the Soviet Union. 'Many people in Russia are saddened by the break-up of the Soviet Union. Its collapse caused a great deal of suffering in the post-Soviet area, and their feeling of loss lasts to this day.'[519]

Along with these feelings of sadness, are sentiments of nostalgia for the Soviet Union. In an interview with Ukrainian television, Vladimir Putin asserted, 'many people in the post-Soviet area regret the loss of the Soviet Union, and they are right to feel this way.'[520]

With regards to Russia's Compatriot Policy, the logic in expanding citizenship through extraterritorial naturalisations is evident; in a news conference in 2013 Vladimir Putin implied there is an injustice in the current situation affecting Russians abroad, 'it so happened that people woke up one day, and the country was gone, and nobody asked them. They suddenly realised they were living abroad.'[521] Vladimir Putin hinted at future foreign policy action by stating,

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[517] L. Todd Wood, "Putin: Breakup of USSR a Great Tragedy for Russians," Washington Times, https://www.washingtontimes.com/news/2015/sep/28/l-todd-wood-putin-breakup-ussr-great-tragedy-russi/.
[518] Vladimir Putin, "Statement for the Press Following the Meeting of the Caucasian Quartet Leaders. 31 May 2001," The Kremlin, http://en.kremlin.ru/events/president/transcripts/24466. 1
[519] "Interview with the Indian Magazine India Today and the Weekly Russia Journal. 29 September 2000.," The Kremlin, http://en.kremlin.ru/events/president/transcripts/24229..
[520] "Interview on Ukrainian Television Channels UT-1, Inter and 1+1. 27 October 2004," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22661.
[521] "News Conference of Vladimir Putin. 19 December 2013," The Kremlin, http://en.kremlin.ru/events/president/transcripts/19859.

> Russian Federation lost tens of thousands of pieces of its historic territory as a result of the collapse of the Soviet Union. And are we now, to divide everything up again? Should we demand the return of the Crimea and parts of the territory of other former Soviet republics and so on? How about giving back Klaipeda then?[522]

Hungary

'Hungary and historical trauma; historical narratives are very present in their psyche.'[523] This statement is reinforced by Viktor Orbán's discourse on history, notably the Treaty of Trianon, which is framed as a traumatic event for the state of Hungary. This form of rhetoric is common among Hungarian politicians; in a personal interview the Hungarian Minister of Foreign Affairs, Ferenc Kalmar, explained, 'other countries want us to celebrate the Peace of Trianon. For us we lost a lot, we cannot celebrate that.'[524] Likewise, the State Secretary of Hungary Árpád János Potápi echoed this sentiment in personal email correspondence by stating,

> The Treaty deprived Hungary of about sixty per cent of its national wealth and relegated the country from the status of a medium-sized regional power to that of a small country. Due to this treaty and several other processes which took place in the 20th century, today one-third of the Hungarian population lives beyond the country's borders.[525]

On 27 July 2013, Viktor Orbán declared the anniversary of the Treaty of Trianon, 4 June, as a day of national unity.[526] His mention of history is frequent and justifies the present-day policy

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[522] "Press Statement and Responses to Questions Following the Russia-European Union Summit. 10 May 2005," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22967.
[523] Personal interview with Claudiu Crăciun - Lecturer of European Politics at National School of Political Science and Public Administration Bucharest in Bucharest, Romania on 30 May 2019. See Interview_ID_22_Claudiu_Crăciun at https://reshare.ukdataservice.ac.uk/854598/
[524] Personal interview with Ferenc Kalmár, Hungarian Minister for Foreign Affairs, in Budapest, Hungary on 16 May 2017. See Interview_ID_34_Ferenc_Kalmár at https://reshare.ukdataservice.ac.uk/854598/
[525] Personal interview via email correspondence with State Secretary of Hungary Árpád János Potápi on 7 June 2017. See Interview_ID_39_Árpád_János_Potápi at https://reshare.ukdataservice.ac.uk/854598/
[526] Christian Lowe; Sandor Peto, "Hungarian PM Urges Ethnic Kin, Scattered by History, to Unite," Reuters, https://www.reuters.com/article/us-hungary-orban-diaspora/hungarian-pm-urges-ethnic-kin-scattered-by-history-to-unite-idUSBRE96Q07520130727.

direction; 'in 2014 we speak of Hungary ... still working hard day after day to make up for historical disadvantages'.[527] Three years later, he elaborates on this sentiment,

> The second and third decades of the twentieth century were an arduous ordeal in the history of the Hungarian nation. We owe a debt of gratitude to a few exceptional statesmen – Regent Miklós Horthy, Prime Minister István Bethlen and Minister Kuno Klebelsberg – for ensuring that history did not bury us under the immense weight of a lost world war, the 133 days of the Red Terror and the diktat of Trianon.[528]

This was not the only time Orbán referred to the Treaty of Trianon as a diktat.[529] At other times he has asserted that Hungary must 'remember the impact [of the Treaty of Trianon] which severed parts of the nation.'[530] In an apparent rallying call, he stated: 'even after the shock of Trianon, it is possible to recover from disaster and build a successful country.'[531] A year later in 2018, he uses a severe metaphor to criticise the Treaty,

> In the summer of 1914, Europe raised a gun to her head – and, once she had done so, why she pulled the trigger. ... a bad decision was made in Vienna, then another in Berlin, a third in Saint Petersburg, a fourth in Paris and a fifth in London; and so many bad decisions combined to lead to a catastrophe that devastated the whole of Europe. The shadow cast by several bad decisions rendered us Hungarians unable to make a good decision: we were not a sovereign state, we were chained to a multi-ethnic empire, to a rock about to plunge to the depths – which reached the ground four years later and shattered into pieces.[532]

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[527] Viktor Orbán, "Hungary 25 Years after the Opening of the Borders – 25 Years of Democracy and Freedom in Europe. 6 November 2014," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/hungary-25-years-after-the-opening-of-the-borders-25-years-of-democracy-and-freedom-in-europe.

[528] "Prime Minister Viktor Orbán's Speech at the Inauguration of the Klebelsberg Memorial Centre and Guest House. 21 June 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-inauguration-of-the-klebelsberg-memorial-centre-and-guest-house.

[529] "Prime Minister Viktor Orbán's Address at the 15th Plenary Session of the Hungarian Standing Conference. 1 December 2016," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-address-at-the-15th-plenary-session-of-the-hungarian-standing-conference.

[530] "Prime Minister Viktor Orbán's Speech on the 61st Anniversary of the 1956 Revolution and Freedom Fight. 23 October 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-on-the-61st-anniversary-of-the-1956-revolution-and-freedom-fight..

[531] "Prime Minister Viktor Orbán's Speech at the Inauguration of the Klebelsberg Memorial Centre and Guest House. 21 June 2017".

[532] "Prime Minister Viktor Orbán's Speech at the Commemoration Ceremony Marking the One Hundredth Anniversary of the Death of Count István Tisza. 31 October 2018," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-commemoration-ceremony-marking-the-one-hundredth-anniversary-of-the-death-of-count-istvan-tisza.

When discussing Hungary's history, Viktor Orbán stated: 'we have the courage to face up to injustice, because on Hungarian soil injustice does excuse one from fulfilling one's obligations.'[533] He calls upon the population to remember history in his narrative:

> We cannot ignore, with a mere shrug of the shoulders, the fact that Hungary's history in the 20th century included a series of events which disrupted the country's historical continuity: humiliating peace treaties following defeat in war, military occupations, dictatorships and radically opposing political systems. Going beyond the demands of sheer logic and history, we cannot ignore this, because the events of the 20th century and decades of silence regarding these events led to the past being subjected to contradictory interpretations in our present-day lives, and before 2010 this prevented the emergence of the consensus needed for the adoption of a new constitution.[534]

Some of Viktor Orbán's fellow Fidesz MPs have portrayed Hungary as a victim. János Lázár, Hungarian MP for Fidesz, stated 'the Hungarian nation is the victim of Trianon and not its originator and perpetrator. ... The Hungarian nation should receive if not material at least moral reparations for the greatest injustice in world history.[535] Viktor Orbán reiterated this emotion, framing the situation in military terms,

> We may have lost many important battles, but we Hungarians do not think in terms of a single battle – or a single campaign. Here in the Carpathian Basin, in a zone where cultures, empires and civilisations clash, we can boast the greatest possible victory: in the end, we always won the war – the war fought for survival of the homeland and survival of the nation.[536]

On 26 May 2010: Zsolt Semjén, Deputy Prime Minister, highlights the sense of historical loss that permeates contemporary political discourse in Hungary:

> to keep solidarity with Hungarian nationals who ended up in foreign countries as the result of changes to national borders is our utmost duty. Hungarian MPs would have

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[533] "Prime Minister Viktor Orbán's Speech at the Official Ceremony Marking the 60th Anniversary of the 1956 Revolution. 23 October 2016," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-official-ceremony-marking-the-60th-anniversary-of-the-1956-revolution.
[534] "Viktor Orbán's Address at the Conference "Dialogue and Identity". 24 April 2015," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/viktor-orban-s-address-at-the-conference-dialogue-and-identity.
[535] Hungarian Spectrum, "A New Declaration of War: Justice for Hungary! ," Hungarian Spectrum, http://hungarianspectrum.org/2017/06/04/a-new-declaration-of-war-justice-for-hungary/.
[536] Viktor Orbán, "Viktor Orbán's Speech on the Anniversary of the 1848 Revolution. 15 March 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/viktor-orban-s-speech-on-the-anniversary-of-the-1848-revolution.

> had to adopt the dual citizenship law even if the Treaty of Trianon had never been concluded. The outcome of the December 2004 referendum [rejecting Hungarian extraterritorial naturalisations] was a spiritual Trianon for Hungarians living abroad. To heal this wound also is our elemental duty.[537]

Resentment

Both the Russian Federation and Hungary have used similar framing methods in their rhetoric surrounding the two states' extraterritorial naturalisations practices. Each state has highlighted a resentment at rivals' apparent misconducts. The enemy in each case differs; sometimes, this is a specific enemy, vague at other times, or even has been a set of values acting against the state's interest. The construction of an existential enemy is typical of authoritarian regimes in efforts to maintain regime stability.[538] When engaging in conflict with external rivals, either in discourse or military intervention, support for the state is generated domestically. States may protest against Russia or Hungary's extraterritorial naturalisations, as Georgia and Slovakia have done, damaging the naturalising state's international reputability. Nevertheless, domestically these activities may be interpreted as a show of strength appreciated by certain portions of the electorate.

Moreover, building up an enemy legitimates the practice of attempting retribution, in this case, extraterritorial naturalisation, in terms of political capital and finances. Thus, rhetoric is vital in framing the extraterritorial naturalisation practice to both a domestic and international audience. Internationally, the state discourse attempts to legitimate the practice by signalling apparent abidance of international laws and norms, and by publicly highlighting, or exaggerating, the mistreatment of the group being naturalised, thereby legitimating interventionist practices.

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[537] Arraiza, "Good Neighbourliness as a Limit to Extraterritorial Citizenship: The Case of Hungary and Slovakia."
[538] Cemal Eren Arbatli and Ekim Arbatli, "External Threats and Political Survival: Can Dispute Involvement Deter Coup Attempts?," *Conflict Management and Peace Science* 33, no. 2 (2016).; Ina Shakrai, "The Legitimization of Authoritarian Rule through Constructed External Threats: Russian Propaganda During the Ukrainian Crisis," *East European Quarterly* 43, no. 1 (2015).

In the case of Russia and Hungary, not only are both states similar with regards to these practices, but they have also demonstrated a desire to ally against the common enemy of the EU and other international bodies. The 'West' is framed as an antagonist and fundamentally opposed to both states' 'core Christian values'. Again, much of this rhetorical device appears to be implemented to strengthen each regime's domestic support; the rhetoric is inconsistent, perhaps done deliberately, to appeal to different segments of society at differing times.

Russia

In official state discourse from the president's office of the Russian Federation externalises the grievances against Russia towards an enemy or rival; the enemy is NATO, the EU, and 'Western' powers more generally. The construction and positioning of this enemy legitimise the extraterritorial naturalisations as a means to rectify previous wrongdoings, and in doing so, creates domestic support as the implementation of the practices becomes a victory against the perceived enemy:

> As the president, the head of the Russian state, as someone who swore an oath to defend this country and its territorial integrity, and simply as a citizen of Russia, I am convinced that in reality we have no choice at all. Because to allow ourselves to be blackmailed and succumb to panic would be to immediately condemn millions of people to an endless series of bloody conflicts like those of Nagorno-Karabakh, Trans-Dniester and other similar tragedies. ... today we must be together, for it is only together that we will vanquish the enemy.[539]

Vladimir Putin recognises the effect of enemy creation on the stability within other states, asserting, 'there are people who need an enemy, they are looking for an opponent to fight

[539] Putin, "Address by President Vladimir Putin. 4 September 2004".

against.'[540] In reference to the United States, somewhat ironically, Putin suggests, 'when there is an external enemy, it united *[sic]* the nation.'[541]

Putin regularly refers to any individual or organisation he perceives as a threat as 'foreign agents'. This designation is not only rhetorical but carries with it legal implications with a restriction on operations and increased scrutiny since the Foreign Agent law was passed in 2012.[542] Moreover, many 'foreign agents' are Russian but labelling them as 'foreign' Putin has attempted to externalise the threat to imply domestic harmony is under attack from the outside.

Hungary

For Viktor Orbán and Hungary, referencing national nostalgia at former periods of grandeur is a common theme in official state discourse, 'a nation that reached the heights that we did – and more than once – must not be content with less. ... There were periods when we needed to control an empire.'[543] Moreover, here is a clear pattern of portraying select foreign actors as external enemies to Hungary's vision or political objectives:

> Hungarian politics has another, well-defined tradition and school of foreign policy. ... This is a foreign policy of conformity, which always sees the Hungarian interest best served by following the actions of others ... this is what we would like to reverse. This tradition is strengthened by the unfair international attacks we are subjected to on a daily basis.[544]

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[540] "Interview to Russia Today TV Channel. 6 September 2012," The Kremlin, http://en.kremlin.ru/events/president/transcripts/16393.
[541] "Visit to Russia Today Television Channel. 11 June 2013," The Kremlin, http://en.kremlin.ru/events/president/transcripts/18319.
[542] *Federal Law of 20 July 2012 No. 121-FZ "on Amendments to Certain Legislative Acts of the Russian Federation Regarding the Regulation of the Activities of Non-Commercial Organizations Performing the Functions of a Foreign Agent"*.
[543] Orbán, "Prime Minister Viktor Orbán's Speech on the 61st Anniversary of the 1956 Revolution and Freedom Fight. 23 October 2017".
[544] "If We Do Not Protect Our Borders, Tens of Millions of Migrants Will Come. 4 September 2015," https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/if-we-do-not-protect-our-borders-tens-of-millions-of-migrants-will-come.

Within this form of rhetoric, the blame is attributed to foreign entities or collectives of states, which frames history in a manner which makes Hungary the victim, but it is not always clear who are the perpetrators of these injustices:

> There are those who want to take our country from us. Not with the stroke of a pen, has happened one hundred years ago at Trianon; now they want us to voluntarily hand our country over to others, over a period of a few decades.[545]

On other occasions, it is more apparent at whom the rhetoric is directed. The quote below is exemplary of the three oft mentioned enemies of Hungary, Brussels (EU), migrants, and George Soros:

> I wish to welcome everyone on this, the birthday of our king Saint Ladislaus. Before I start the main body of my speech, it is right and proper to commemorate a king who built our nation. Saint Ladislaus strengthened the Hungarian state, thus protecting us against all external attacks and internal intrigues, and his practice of Realpolitik among the great powers guaranteed our country's independence: 'Stop Brussels'. His actions protected the Hungarian people against destruction by nomadic peoples: 'Stop migrants'. Pursuing the course set by Saint Ladislaus has strengthened the identity of the Hungarian state and the Hungarian nation: 'Stop Soros'. The Hungarians have pursued this path for a thousand years, and today we Hungarians likewise do not want to abandon this path.[546]

Between 2014 and 2019, Viktor Orbán mentions Brussels in a negative context 706 times, George Soros is mentioned on 656 occasions, migration 1045, and migrants 656 times. Viktor Orbán not only attacks the institutional body of the European Union itself, but the liberal values and progressive ideas which he suggests are undermining Western civilisations:

> Széchenyi urged us on by saying that when the whole of Europe disintegrates, Hungary – rising from its ashes – will, to the glory of humanity, stand guard over order, peace and freedom: just as when it once defended Christianity. When within us there is more patriotism than envy, and more civic virtue than desire for glory, I sincerely believe that the Hungarian nation will come to something – and something great.[547]

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[545] "This Is Our Country, and We Shall Fight for It to the End. 15 March 2018," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/news/this-is-our-country-and-we-shall-fight-for-it-to-the-end.
[546] "Prime Minister Viktor Orbán's Speech at the Closing Event for the National Consultation. 27 June 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-closing-event-for-the-national-consultation.
[547] "Viktor Orbán's Speech on the Anniversary of the 1848 Revolution. 15 March 2017".

The enemy to Viktor Orbán's Hungary is not always an actor but can be a set of values that he believes are threatening the nation of Hungary. 'I think that in Western Europe young people will have to prepare themselves for lives in which they will see the loss of Christian Europe, and they will see themselves becoming a minority in their own world.'[548]

Rectification

In official state discourse, both Russia and Hungarian officials frame the extraterritorial naturalisations, and related activities, as a means to rectify losses and wrongdoings against the states by external actors. Statements made by politicians from the two naturalising states highlight this sentiment.

Russia

For the Russian Federation, the collapse of the Soviet Union shaped the humanitarian dimension of the Russian Federation. This aspect of Russia's foreign policy is framed in a manner which places rectification for past grievances as a core objective:

> We know that the Soviet Union's collapse left 25 million ethnic Russians or those who consider their roots to be in Russia outside the Russian Federation borders. They found themselves beyond our borders not of their own free will, and it is our duty to help those of them who wish to do so, without imposing anything on anyone, to return to Russia.[549]

[548] "Prime Minister Viktor Orbán on Kossuth Radio's "180 Minutes" Programme. 30 March 2018," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-on-kossuth-radio-s-180-minutes-programme20180330.
[549] Vladimir Putin, "Meeting of Council for Civil Society and Human Rights. 12 November 2012," The Kremlin, http://en.kremlin.ru/events/president/transcripts/16791.

Much of the state discourse is threatening and assertive: 'if the rights of our Compatriots are violated, we cannot turn a blind eye. We must respond appropriately, choosing the means that will bring about a positive result.'[550]

In reference to the Russo-Georgian conflict, President Dmitri Medvedev, famously stated on 8 August 2008 that,

> in accordance with the constitution and the federal laws, as President of the Russian Federation it is my duty to protect the lives and dignity of Russian citizens wherever they may be. It is these circumstances that dictate the steps we will take now.[551]

Similarly, Vladimir Putin asserted, 'We must fight for the interests of Russians, our Compatriots, not just within our nation but abroad as well, including in Ukraine, the Baltics and other regions of the world.'[552] This threat is restated, 'we will consistently protect our citizens, wherever they may live. ... We will act firmly, but in such a way as to strengthen rather than weaken ties with the countries where our Compatriots live.'[553]

This theme was present again surrounding the annexation of Crimea. On 18 March 2014, in Putin's address to Russian Duma, he frequently references the Russian diaspora living in Crimea, claiming 'millions of Russians and Russian-speaking people live in Ukraine and will continue to do so. Russia will always defend their interests using political, diplomatic and legal means.'[554] In July 2014 Vladimir Putin said,

> I would like to make it clear to all, our country will continue to actively defend the rights of Russians, our Compatriots abroad, using the entire range of available means - from political and economic to operations under international humanitarian law and the right of self-defence.[555]

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[550] "Speech at a Security Council Session. 19 July 2004," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22546.
[551] Dmitry Medvedev, "Statement on the Situation in South Ossetia," The Kremlin, http://en.kremlin.ru/events/president/transcripts/1042.
[552] Vladimir Putin, "Media Forum of Independent Local and Regional Media. 24 April 2014," The Kremlin, http://en.kremlin.ru/events/president/transcripts/20858.
[553] "Press Conference with Russian and Foreign Media. 20 June 2003," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22028.
[554] "Address by President of the Russian Federation. 18 March 2014," The Kremlin, http://en.kremlin.ru/events/president/news/20603.
[555] "Conference of Russian Ambassadors and Permanent Representatives. 1 July 2014," The Kremlin, http://en.kremlin.ru/events/president/news/46131.

He explicitly defended the Russian Federation's actions in Crimea by stating 'the main point is that we had to protect our Compatriots who live there.'[556] He further elaborated on this point, stating:

> We understood that Crimea was much more to us than just a piece of land, even a strategically important piece of land. What was at stake here were the millions of Russian people, millions of Compatriots who needed our help and support. We understood how important this is to us and that this was not simply about land, of which we have no shortage as it is. The issue at stake here was the sources of our history, our spirituality and our statehood, the things that make us a single people and single united nation. Friends, we in Russia always saw the Russians and Ukrainians as a single people. I still think this way now.[557]

Vladimir Putin explicitly mentions the defence of human rights as a reason for the military intervention in Crimea:

> We need to understand clearly that the events provoked in Ukraine are the concentrated outcome of the notorious deterrence policy. As you may know, its roots go deep into history and it is clear that unfortunately, this policy did not end with the end of the Cold War. In Ukraine, as you may have seen, at threat were our Compatriots, Russian people and people of other nationalities, their language, history, culture and legal rights, guaranteed, by the way, by European conventions. When I speak of Russians and Russian-speaking citizens I am referring to those people who consider themselves part of the broad Russian community, they may not necessarily be ethnic Russians, but they consider themselves Russian people.[558]

Human rights also feature in Vladimir Putin's official state discourse on the Russian Compatriots in the Baltic States.

> We continue to be concerned about the situation with the rights of our Compatriots in Latvia and Estonia. We consider the soft line taken towards attempts to make heroes of Nazi collaborators and revise pages in Europe's twentieth-century history unacceptable.[559]

Much of the official state discourse is simultaneously inflammatory and derogatory, which legitimises foreign policy decisions. In 2008 Vladimir Putin, when speaking to George

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[556] "Seliger 2014 National Youth Forum. 29 August 2014," The Kremlin, http://en.kremlin.ru/events/president/transcripts/46507.
[557] "Concert Celebrating Crimea and Sevastopol's Reunification with Russia. 18 March 2015," The Kremlin, http://en.kremlin.ru/events/president/transcripts/47878.
[558] "Conference of Russian Ambassadors and Permanent Representatives. 1 July 2014".
[559] Dmitry Medvedev, "Joint Press Conference Following the Russia-European Union Summit," The Kremlin, http://en.kremlin.ru/events/president/transcripts/575.

W. Bush about Ukraine at NATO Bucharest Summit, said: 'Ukraine is not even a state. What is Ukraine? Part of its territories is Eastern Europe, but the greater part is a gift from us.'[560] When laying a wreath in Moscow in 2009, Vladimir Putin described Ukraine as 'Little Russia.'[561] Later in 2015, Vladimir Putin ordered the Russian Prosecutor General's Office to review the legality of Russia's recognition of the independence of the Baltic states.[562] In a televised award ceremony in Moscow on Friday, 25 November 2016, in Moscow, Vladimir Putin said Russia's borders 'do not end anywhere'.[563] In reference to Georgia, Vladimir Putin stated,

> Following the collapse of the Soviet Union at the beginning of the 1990s, when Georgia, which had gained its independence, announced that it was abolishing the autonomous status of South Ossetia and Abkhazia. This was the foolish decision that ignited these interethnic conflicts. What we are seeing today is a relapse of what happened at the beginning of the 1990s. Russia, like the other CIS countries, is ready to make what contribution it can to settling these conflicts and restoring Georgia's territorial integrity. But we are not going to take on functions that it is not our role to have and we are not going to take sides.[564]

Much of Russia's legitimising rhetorical device has focussed on the supposed responsibility to protect Russians, whether recently naturalised or not:

> For their internal use, addressing their own public opinion, it works. [Russia] stated that we were protecting our fellow citizens who are just living there. We have thousands of Abkhazians and other citizens living there. Being our fellow citizens, Russian citizens with Russian passports, we have to protect their rights and property. The same rhetoric, however false, but it was quite effective when addressing Russian people, Russian minds and hearts. ... I would say quite nationalist emotions. [565]

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[560] James Marson, "Putin to the West: Hands Off Ukraine," Time, http://content.time.com/time/world/article/0,8599,1900838,00.html.
[561] Ibid.
[562] Barbara Tasch, "Russia Is Reviewing the 'Legality' of Baltic States' Independence," Business Insider, http://uk.businessinsider.com/russia-reviews-baltic-states-independence-2015-6.
[563] Tom Embury-Dennis, "Vladimir Putin Says Russia's Borders 'Do Not End Anywhere'," The Independent, https://www.independent.co.uk/news/world/europe/putin-russia-border-do-not-end-anywhere-comments-quote-eu-us-tensions-a7438686.html.
[564] Vladimir Putin, "Extracts from the Press Conference Following the Meeting with Ukrainian President Leonid Kuchma. 19 August 2004," The Kremlin, http://en.kremlin.ru/events/president/transcripts/22571.
[565] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/

Hungary

Viktor Orbán has made bold statements about Hungary's future and their regional ambitions: 'the Carpathian Basin the future will be written in Hungarian.'[566] Later he emphasises the determination in realising these aspirations,

> Our plan to rebuild the entire Carpathian Basin. In a historical sense, I believe that Hungary's one hundred years of solitude is at an end. Once more we are strong, we are determined, we are brave, and we have our vigour, money and resources. And over the past few years we have proved to our neighbours that whoever cooperates with the Hungarians will prosper. Now is the time to rebuild the Carpathian Basin.[567]

Viktor Orbán explicitly states his desire for more considerable Hungarian influence: 'I am convinced that, by interconnecting the elements of the Hungarian nation, we will have a significant influence on the future of the Carpathian Basin.'[568] The Hungarian form of rectification featured in official state rhetoric is one which emphasises the need or desire for the Hungarian nation to return to greatness: 'There were times – more than once – when we needed to rebuild and restructure a ravaged motherland after its devastation by the enemy.'[569]

Viktor Orbán also frequently highlights his return to power in 2010 as a seminal moment in Hungarian history:

> The political and social consequences of the April 2010 elections have created an opportunity for the reunification of the Hungarian nation across borders. The new political order will bind together the diverse Hungarian nation, the equal members of which are Hungarians living in Hungary, in the Carpathian Basin and in communities dispersed around the world. The momentous change which is taking place in the country's policy on Hungarian communities abroad reflects a new approach, in which

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[566] Viktor Orbán, "Prime Minister Viktor Orbán's Speech at the 16th Plenary Session of the Hungarian Standing Conference. 10 November 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-16th-plenary-session-of-the-hungarian-standing-conference.
[567] "Prime Minister Viktor Orbán's Speech at the 29th Bálványos Summer Open University and Student Camp. 28 July 2018," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-29th-balvanyos-summer-open-university-and-student-camp.
[568] "Prime Minister Viktor Orbán's Speech at the 16th Plenary Session of the Hungarian Standing Conference. 10 November 2017".
[569] "Prime Minister Viktor Orbán's Speech on the 61st Anniversary of the 1956 Revolution and Freedom Fight. 23 October 2017".

> formerly neglected Hungarian-Hungarian relations are being replaced by the sense of responsibility which we share for each other.[570]

Viktor Orbán, in reference to the widespread changes brought about by his Fidesz government, also frequently refers to borders and their diminishing importance to the Hungarian nation. 'Today we have sovereignty, our own path, a strong economy, and national cohesion spanning borders which embraces every Hungarian.'[571] He explicitly mentions efforts to reunify the nation extraterritorially and how extraterritorial naturalisations enabled this,

> The greatest success of the years between 2010 and 2016, which we may be the proudest of, is nothing less than the reunification of the nation. A hundred years after the Trianon diktat, the constituent parts of the Hungarian nation have found each other, we are strengthening each other, and Hungarian-Hungarian cooperation has become daily practice. Here I would also like to quote some figures: in the last few years 860,000 Hungarians beyond the borders have submitted requests for accelerated naturalisation or reinstatement of citizenship; 810,000 of them have already taken their citizenship oaths, and we have established the eligibility for Hungarian nationality of 100,000 people living in Hungarian diaspora communities.[572]

In ignoring other states' protestations against reunification, Viktor Orbán claims, 'the reality of a peaceful unification of the nation across the borders is becoming visible.'[573] He alludes to undoing some of the impacts of the historical events mentioned previously: 'The one hundred years of solitude that was the lot of Hungarians in the Carpathian Basin is now at an end. We are also regaining the recognition and respect of our neighbours.'[574] Viktor Orbán appears confident in the trajectory of Hungary concerning their neighbours:

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[570] "Prime Minister Viktor Orbán's Address at the 15th Plenary Session of the Hungarian Standing Conference. 1 December 2016".
[571] "Prime Minister Viktor Orbán's Speech at the Commemoration Ceremony Marking the One Hundredth Anniversary of the Death of Count István Tisza. 31 October 2018".
[572] "Prime Minister Viktor Orbán's Address at the 15th Plenary Session of the Hungarian Standing Conference. 1 December 2016".
[573] "Prime Minister Viktor Orbán's Speech at the National Event Commemorating the 500th Anniversary of the Beginning of the Reformation. 31 October 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-national-event-commemorating-the-500th-anniversary-of-the-beginning-of-the-reformation.
[574] "Hungary Has Set out on an Upward Path. 25 December 2018," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/hungary-has-set-out-on-an-upward-path.

> I can now tell you objectively that not since the Treaty of Trianon has Hungary been as close as it is today to regaining its strength, prosperity and prestige as a European country. And not since Trianon has our nation been as close as it is today to regaining its self-confidence and vitality.[575]

While emphasising the strength of the Hungarian nation, he often downplays the importance of the internationally recognised borders that fragment the nation:

> The natural fabric that once united the Hungarian communities in the Carpathian Basin, and who now live in the territories of different states, is coming into being once again. Soon we will be able to speak of a single Hungarian community in the Carpathian Basin, regardless of state borders, which has its own language, which has its own culture, its own economy and its own network of relations; a community in which the constituent individuals and families are aware of their belonging to the same community, and who see each other as Compatriots.[576]

This statement is perhaps ironic given his frequent references to the importance of strengthening Hungarian and European borders to prevent migration to Hungary. On 27 July 2013, Viktor Orbán described his objectives behind extraterritorial naturalisations while explicitly referencing the Treaty of Trianon:

> Twentieth-century history has made Hungary a dispersed nation, as things stand now, a legal link among Hungarians in the world can be established through the citizenship link rather than on a territorial basis. If we want to add up and organise the strength of all Hungarians living in the world, we can do it only via citizenship. In this way, we could become a strong nation from a dispersed nation.[577]

On 28 January 2015, Hungary's Ministry of Foreign Affairs and Trade Péter Szijjártó explained:

> Due to the introduction of the simplified naturalisation procedure, the process of the Hungarian nation's reunification could begin after ninety years, and those who wanted

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[575] "Viktor Orbán's Speech at the 28th Bálványos Summer Open University and Student Camp. 22 July 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/viktor-orban-s-speech-at-the-28th-balvanyos-summer-open-university-and-student-camp.
[576] "Interview with Prime Minister Viktor Orbán on the Transylvanian Hungarian Television Programme "Taking Stock". 9 December 2016," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/interview-with-prime-minister-viktor-orban-on-the-transylvanian-hungarian-television-programme-taking-stock.
[577] Peto, "Hungarian PM Urges Ethnic Kin, Scattered by History, to Unite".

> to belong to the community of the Hungarian nation under public law were given an opportunity to realise this.[578]

Viktor Orbán similarly stated:

> The most important event in the past year has been that the Hungarians of the Carpathian Basin have broken through another psychological barrier: we have been able to welcome the one millionth person confirmed as a new Hungarian citizen. This has been the most important development of the past year. If that was all that had been achieved, it would still be worth celebrating. But we've done more than that: I can express what we've done as transforming the process of unifying the nation into a process of nation-building.[579]

Viktor Orbán has used official platforms to emphasise his commitment and ambition to expand these policies; 'you cannot isolate a country which is a world nation, which has communities throughout the world: larger ones in the Carpathian Basin and smaller ones scattered around the world.'[580] A few days prior, Viktor Orbán explicitly refers to the extraterritoriality aspect of national policy and their diaspora.

> You should also think about our communities living in the Carpathian Basin beyond our current state borders. You should also build relations with them. We shall also mobilise significant resources for those communities. The reunification of the Hungarian nation is ongoing, and while there are political and legal limits, there are also political and legal possibilities. You all know about dual citizenship. You can see that we seek to promote and support our educational institutions and churches in the Carpathian Basin as much as our resources permit – and sometimes even beyond. This has its signs, and its results. I would like the Hungarian diaspora to form links not only with the mother country, but also with the other communities of the Carpathian Basin. This would be an approach which is worthy of a world nation.[581]

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[578] Chris Harris, "What's the Link between Ww1 and Hungary's 675,000 New Citizens?," Euronews, https://www.euronews.com/2015/01/28/whats-the-link-between-world-war-1-and-hungarys-675000-new-citizens.
[579] Orbán, "Prime Minister Viktor Orbán's Speech at the 29th Bálványos Summer Open University and Student Camp. 28 July 2018".
[580] "Prime Minister Viktor Orbán's Address at the 15th Plenary Session of the Hungarian Standing Conference. 1 December 2016".
[581] "Prime Minister Viktor Orbán's Speech at the 6th Meeting of the Hungarian Diaspora Council. 30 November 2016," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-6th-meeting-of-the-hungarian-diaspora-council.

Viktor Orbán has made frequent reference to the Hungarian nation and the demographic problems it faces, and that 'population policy is at the heart of Hungary's economic policy.'[582] In doing so, he explicitly links the nation, demography with economic strength:

> Hungarians must be seen as an endangered species demographically, and the people – but the Government above all – should understand the imperative which is implicit in this. So in the area of demography we need a shift in scale, and development at a higher rate. I believe that this is what we need in terms of the nation's organisation. In the period ahead we must dramatically intensify organisation of the Hungarian community in the Carpathian Basin – and in particular its economic strength.[583]

Viktor Orbán in making persistent reference to the demography decline of the nation is keen to refer to history:

> We're not just a people from the Carpathian Basin, but a great people – even though at present we are shrunken and in demographic decline. But this doesn't change the fundamental fact – more than one thousand years old – that we are a great nation, and this is a driving force, and an asset to this country.[584]

He is also keen to show that Hungary is prepared to tackle demographic decline without resorting to immigration from beyond the nation:

> The greatest danger for Europe – and therefore Hungary – is demographic decline. The response devised for this in the West has been immigration. If our country rejects this, then we must ask whether we will be able to reverse this process by relying only on our own resources.[585]

Viktor Orbán explicitly refers to strategy regarding their external population: 'We have a strategy – a diaspora policy with strategic goals. ... So our diaspora policy is systematic'[586] as

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[582] "Prime Minister Viktor Orbán's Speech at the Session of the Who Regional Committee for Europe. 11 September 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-session-of-the-who-regional-committee-for-europe.
[583] "Viktor Orbán's Speech at the 28th Bálványos Summer Open University and Student Camp. 22 July 2017".
[584] "Prime Minister Viktor Orbán's Speech at the Hungarian Chamber of Commerce and Industry's Ceremony to Mark the Start of the 2017 Business Year. 28 February 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-hungarian-chamber-of-commerce-and-industry-s-ceremony-to-mark-the-start-of-the-2017-business-year.
[585] "Hungary Has Set out on an Upward Path. 25 December 2018".
[586] "Prime Minister Viktor Orbán's Speech at the 7th Plenary Session of the Hungarian Diaspora Council. 9 November 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-

well as influence 'we have always asked our fellow Hungarians in Transcarpathia to find forms of cooperation which exert the greatest possible influence and total strength on behalf of the Hungarian community living there.'[587]

Defining who is in and who is out of the nation or state

The extraterritorial naturalisations of Russia and Hungary increased the citizens of these states dramatically and almost instantaneously. Running parallel to the legislation that enabled the practice, is the official state discourse which defines which individuals are part of the state and nation and therefore which people are subjects or beneficiaries of the naturalising states' policies. This discourse is not always consistent, and the impact of the flexibility in rhetoric allows for the contours of national and state membership to move.

The Russian Compatriots: conceptual ambiguity

The Russian Compatriot Policy is a central part of the humanitarian dimension of Russian Foreign Policy. However, the term 'Compatriot' is vague as it is not clear who is included within this category, even for so-called Compatriots. As others have, it is argued here that Russia's extraterritorial naturalisations should be considered part of the Compatriot Policy,[588] but are not synonymous with one another. Regarding scope, the Russian Compatriot Policy is far broader and far more inclusive than the Russian extraterritorial naturalisations or

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minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-7th-plenary-session-of-the-hungarian-diaspora-council.

[587] "Prime Minister Viktor Orbán's Speech at the 14th Plenary Session of the Hungarian Standing Conference. 3 December 2015," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-speech-at-the-14th-plenary-session-of-the-hungarian-standing-conference.

[588] See Grigas, *Beyond Crimea: The New Russian Empire*. who also considers Russian extraterritorial naturalisations (referred to as passportization) as part of the broader Russian Compatriot Policy.

passportization, which are conducted with a specific population and territory in mind. As will be explained later in the thesis, the strategic utility of specific populations and territories over others, informs the utilisation of the practice in these regions. The Compatriot Policy's broad scope allows Russian politicians to legitimate the naturalisations of targeted populations in their rhetoric by suggesting that the Russian Federation is responsible for protecting these populations and formulating policy accordingly.

Vladimir Putin has suggested that the term 'Compatriot' is inclusive and extensive: 'our distinguished Compatriots have been of different ethnicities and faiths, but a feeling of responsibility for Russia's future.'[589] However, central to the Compatriots is language. In other words, Russophones are Compatriots:

> It is not only Russian language and culture that unite us, although of course these are important and fundamental things that bind together the people in this hall, but also respect for our history and our traditions, and, most importantly, a common concern for Russia, for Russia's destiny and ultimately for our shared destiny.[590]

Moreover, the boundaries of the membership criteria are on occasion, flexible to the point of contradiction. Vladimir Putin has stressed the linkages between the Russian Orthodox church and Russian Compatriotism.

> The restoration of unity in the Church is an essential prerequisite for the restoration of the lost unity of the entire Russian world, a world in which the Orthodox faith has always acted as a spiritual foundation. Everywhere, wherever fate has dispersed our people, their first concern has always been building a cathedral. And today it is precisely the Church that acts as a unique, island Motherland for so many of our Compatriots that live far away from Russia.[591]

Vladimir Putin even suggested that the Church has a role in expanding the humanitarian dimension of Russian foreign policy: 'we can see that the Russian Orthodox Church and our

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[589] Vladimir Putin, "Hero of Labour of the Russian Federation Medal Presentation Ceremony. 30 April 2016," The Kremlin, http://en.kremlin.ru/events/president/transcripts/51830.
[590] "Speech at Third Russian World Congress of Compatriots Abroad. 1 December 2009," The Kremlin, http://en.kremlin.ru/events/president/transcripts/48523.
[591] "Speech at the Ceremonial Signing of the Act on Canonical Communion of the Moscow Patriarchate and the Russian Orthodox Church Abroad. 17 May 2007," The Kremlin, http://en.kremlin.ru/events/president/transcripts/24258.

other traditional religions are playing an ever-greater role in expanding humanitarian ties between our Compatriots and Russia.'[592]

The Russian Federation's Compatriot Policy, of which extraterritorial naturalisation, has been a part of, is an essential aspect of Russian foreign policy:

> The 'Compatriots' policy' is one of the tools to achieve Russia's foreign policy goals. Additionally, Russia widely uses 'soft' power tools as the Russian Orthodox church, different foundations as Russian World Foundation (Russkiy Mir), the Gorchakov Foundation, Federal Agency Rossotrudnichestvo etc.[593]

The concept is vague; as Vytis Jurkois, the Head of Freedom House Vilnius states, deliberately so as,

> It means any kind of manipulation can be used. Orthodox Church? Yes. It was the Soviet Union, who won the World War? Yes. Russian speaking population? Yes. Russian language? Yes. Whatever. It could be a Lithuanian person, who was a veteran of the second world war, it fits.[594]

Even those who might be considered as Russian Compatriots express confusion:

> I have no idea how this stuff of Russian Compatriots works. I even do not know who Russian Compatriots are. I thought that they are Russian citizens, but yesterday I was told, 'no, no, no'. It is absolutely everybody who believes that he is a Russian Compatriot.[595]

Some Russian speakers are critical of the instrumentalisation of Russia's Compatriot Policy:

> Russian policies in recent years are probably the worst which can be imagined with regards to the interest of their Compatriots. ... Russia has some very mystical Compatriot status. I have no idea of what it is about. I am afraid, no one knows. ... It seems to me that actually Russia and the Soviet Union never cared about their people for those inside the country and abroad, so I do not think that humanitarian considerations play any role in their policies. The so-called Compatriot policies for the Russian world, is on the one hand propaganda for domestic consumption. ... It is a

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[592] "World Congress of Compatriots. 5 November 2015," The Kremlin, http://en.kremlin.ru/events/president/transcripts/50639.
[593] Personal interview with the Latvian Ministry of Foreign Affairs in Riga, Latvia on 26 April 2019. See Interview_ID_05_Latvian_MFA at https://reshare.ukdataservice.ac.uk/854598/
[594] Personal interview with Vytis Jurkois - Head of Freedom House Vilnius in Vilnius, Lithuania on 16 May 2019. See Interview_ID_12_Vytis_Jurkois at https://reshare.ukdataservice.ac.uk/854598/
[595] Personal interview with Yana Toom MEP, in Tallinn, Estonia on 2 May 2019. See Interview_ID_03_Yana_Toom at https://reshare.ukdataservice.ac.uk/854598/

> policy with a clear disregard for human considerations. It creates an instrumentalisation of citizenship and puts enormous pressure on [Russia's] neighbouring states.[596]

The borderless Russian nation in Russian federal law

In May 1999, the Russian Federation adopted the law 'On State Policy of the Russian Federation towards Compatriots Abroad'. This law defined in legislation a Compatriot as 'those who share a common language, religion, culture, traditions and customs, as well as their direct descendants.'[597] This legislation was amended on 24 July 2010 when Dmitry Medvedev signed the Federal Law 'On Amendments to the Federal Law On Russian Federation's State Policy toward Compatriots Living Abroad.'[598] This amendment to federal law defined a Russian Compatriot as 'people living outside the border of the Russian Federation who made a free choice in favour of spiritual and cultural connection with Russia and who usually belong to peoples which have historically lived on the territory of the Russian Federation'.[599] It has been argued that the (deliberate) lack of clarity in defining who is a Russian Compatriot, who in turn form the Russian nation, has meant that they 'can be defined as anyone from ethnic Russians to all former Soviet citizens'[600] and that these amendments to the legislation 'legally institutionalises the ambiguity of nation's boundaries.'[601] The Compatriot laws are essential as they are the 'main legal instrument by which Russia defines the target of its policies in the post-Soviet region.'[602] The consequence

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[596] Personal interview with Boriss Cilivecs - Latvian Harmony MP in Riga, Latvia on 9 May 2019. See Interview_ID_10_Boriss_Cilivecs at https://reshare.ukdataservice.ac.uk/854598/
[597] European Commission for Democracy Through Law (Venice Commission), "The Protection of National Minorities by Their Kin-States."
[598] The Kremlin, "Amendments to the Law on State Policy toward Compatriots Living Abroad," http://en.kremlin.ru/events/president/news/8429.
[599] Oxana Shevel, "Russian Nation-Building from Yel'tsin to Medvedev: Ethnic, Civic or Purposefully Ambiguous?," *Europe-Asia Studies* 63, no. 2 (2011).
[600] Ibid.
[601] Ibid.
[602] Ibid.

of these Compatriot laws is that the Russian nation is territorially borderless and open to differences in interpretation.

The People, the state, and the nation in the 2010 Hungarian Fundamental Law and official state discourse

Discussions about the political unification of the Hungarian nation and the Hungarian state had been ongoing since the 1990s. On 8 October 1998, Zsolt Nemeth, state secretary at the Hungarian Foreign Ministry, stated: 'the Hungarian nation's borders do not coincide with Hungary's borders.'[603] A few weeks later, on 21 October 1998, Undersecretary of State Tibor Szabo reaffirmed this previous comment by suggesting:

> This [the difference between the national and state borders of Hungary] is a geographical fact. If you look at the map, you can see that the areas where the Hungarians are living do not coincide with the Hungarian borders. So, in this sense, the Hungarian nation does indeed not coincide with the borders of Hungary. This is not a viewpoint. This is a fact.[604]

The implementation of Hungarian Fundamental law in 2010 pivotally (re)defined the Hungarian nation, with consequences for the conceptualisation of Hungary's people and territory. The State Secretary of Hungary, Árpád János Potápi, explained, in a personal interview, the change in the relationship between the state and the nation:

> In 2010, the Hungarian National Assembly adopted the Act on the Testimony for National Cohesion. It is the basic principle of the policy for Hungarian communities abroad. The Act states the following: 'The Hungarian National Assembly declares that all members and communities of the Hungarian nation, subjected to the jurisdiction of other states, belong to the single Hungarian nation whose cross-border cohesion is a reality and, at the same time, a defining element of the personal and collective identity of Hungarians.'[605]

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[603] Kitty McKinsey, "Hungary: New Government Feels Responsible for Minorities Abroad," Radio Free Europe/Radio Liberty, https://www.rferl.org/a/1089765.html.
[604] "Hungary: New Government Feels Responsible for Minorities Abroad," RadioFreeEurope RadioLiberty, https://www.rferl.org/a/1089765.html.
[605] Personal interview via email correspondence with State Secretary of Hungary Árpád János Potápi on 7 June 2017. See Interview_ID_39_Árpád_János_Potápi at https://reshare.ukdataservice.ac.uk/854598/

According to Ferenc Kalmár, Hungarian Minister for Foreign Affairs, this change makes the Hungarian state responsible to the nation: 'In 2011 we voted in the new ... basic law or fundamental law. In this fundamental law, it is written that the Hungarian state bears responsibility for the Hungarian communities abroad.'[606]

The new fundamental law provides several notable passages within the constitution's text, and the surrounding discourse about the constitution signalled a change in the framing of the Hungarian nation and state with repercussions for future foreign policy.[607] These are as follows:

First, the word Republic has been removed from the state's constitutional name, meaning the name reverts to the title the land had during the Austrian-Hungarian empire before 1920.[608]

Second, there are multiple references to historical territory within the new constitution.

a) The preamble stresses the need to: 'preserve the intellectual and spiritual unity of our nation, torn apart by the storms of the past century'.
b) to preserve 'the man-made and natural riches of the Carpathian Basin'
c) Within the recently modified citizenship legislation on naturalisation procedures, a criterion stating those are eligible if they are able to 'demonstrate the plausibility of his or her descent from Hungary'.[609]

Third, the new constitution does not explicitly reference international borders; this is pertinent given that this removes the promise to 'respect internationally recognised borders' which was present in the 1989 constitution.[610]

The formalised nationality law mirrors the objectives set out in the Status Law, which is limited only to the territory of the former Kingdom of Hungary, pre-Trianon and not, for

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[606] Personal interview with Ferenc Kalmár, Hungarian Minister for Foreign Affairs, in Budapest, Hungary on 16 May 2017. See Interview_ID_34_Ferenc_Kalmár at https://reshare.ukdataservice.ac.uk/854598/
[607] Arraiza, "Good Neighbourliness as a Limit to Extraterritorial Citizenship: The Case of Hungary and Slovakia."
[608] Article 4(3), *The Fundamental Law of Hungary*.
[609] Preamble, ibid.
[610] Article 5, *The Hungarian Constitution*.: The State of the Republic of Hungary shall defend the freedom and power of the people, the independence and territorial integrity of the country, and her borders as established in international treaties.

instance, applicable for the Hungarian diaspora elsewhere globally.[611] During a personal interview, Árpád János Potápi, Secretary of State for National Policy and the Chairman of the Committee of National Cohesion and of the Foreign Affairs and Hungarian Minorities Abroad Committee stated:

> There is one single Hungarian nation that belongs together, Hungary shall bear responsibility for the fate of Hungarians living beyond its borders, and shall facilitate the survival and development of their communities; it shall support their efforts to preserve their Hungarian identity, the assertion of their individual and collective rights, the establishment of their community self-government, and their prosperity in their native lands, and shall promote their cooperation with each other and with Hungary.[612]

Conclusion

The state officials of Russia and Hungary use particular rhetoric when referring to historical events that have shaped the two states' history. In doing so, they engage in a process whereby they use revisionist discourse relating to historical events to legitimate their extraterritorial naturalisations practices and expansion of the nation. Russia has a comprehensive and often vague conceptualisation of the Russian Compatriot, meaning Russia can aim discourse at various groupings of people depending on its objective.

Hungary, officially through constitutional changes, and in public discourse, has referred to a nation that is not aterritorial, but one which ranges across its current territorial borders. The reunification of the Russian and Hungarian peoples beyond the sovereign territorial borders of each state as a consequence of the collapse or disintegration of their former respective Union or empire has been an explicit goal of both Russia and Hungary. Extraterritorial naturalisations are the means to achieve this goal. Although the extraterritorial naturalisations are a part of the Russian Compatriot Policy, they are not synonymous with

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[611] *Act LXII of 2001 on Hungarians Living in Neighbouring Countries*.
[612] Personal interview via email correspondence with State Secretary of Hungary Árpád János Potápi on 7 June 2017. See Interview_ID_39_Árpád_János_Potápi at https://reshare.ukdataservice.ac.uk/854598/

each other, and there are important distinctions between the two policies. The Russian Compatriot Policy intends to build ties with Russians in Central Asia, for instance, but Russia has not conducted extraterritorial naturalisations in these regions. The Compatriot Policy is far more extensive than the extraterritorial naturalisations conducted with a specific target population (and territory) in mind.

The rhetoric used by Russian President Vladimir Putin and Hungarian Prime Minister Viktor Orbán surrounding the external populations, events, and territories relevant to the extraterritorial naturalisation practices is strikingly similar. Both leaders use a cognitive framing of historical events by referring to the demise of their respective previous empires and unions as 'tragedies' and 'injustices' caused by external agents and are, therefore, a loss for the state. This loss is then attributed to an external enemy or rival that fosters a sense of resentment, which necessitates action being taken to rectify these losses and injustices. They legitimise extraterritorial naturalisations practices within other sovereign states and stress the need to take responsibility for their peoples in this land, meaning it is a question of legacy and territory.

However, it is important to note that lots of states frame external enemies for purposes of internal consolidation. Most of them do not conduct extraterritorial naturalisations; there are missing factors to explaining the phenomenon, these factors, namely the pursuit of strategic gains and power will be addressed in the subsequent chapters of this thesis.

This chapter has shown, using empirical data collection of Russian and Hungarian official state discourse and text, how both states' rhetoric has a significant role in attempts to legitimise the practice of extraterritorial naturalisation and popular national expansion. The next chapter will examine protestations at the extraterritorial naturalisations and the surrounding rhetoric.

Chapter 5: Perceptions and Criticisms of Extraterritorial Naturalisations

The previous chapter showed how Russia and Hungary used official state rhetoric regarding the relationship between the naturalising states, their naturalised populations, related events, and territories to justify extraterritorial naturalisations. This justification is essential to the policy, as conferring citizenship upon a population requires 'buy-in' from those naturalised and the rest of the domestic population who might need convincing that the practice is a worthwhile endeavour and expense. Moreover, these justifications of contentious extraterritorial naturalisation practices attempt to address stakeholders' criticisms in the international community, this chapter's focus. The complaints against extraterritorial naturalisations show how and why states and superstructures impacted by the practice object and respond. These responses reveal the inter-state tension caused by conferring citizenship upon another state's population and point to underlying power struggles between contiguous states.

Extraterritorial naturalisations conducted by one state inevitably involves the bestowment of citizenship to an individual or group in another state's legal sovereign territory. Therefore, this practice can be contentious, and states and international bodies have raised concerns about using the practice. Even before the Russian Federation and the Hungarian state's implementation of extraterritorial naturalisations, concerns were raised about the practice in the UN General Assembly,

> concern was expressed about the adoption by successor States, of nationality laws under which they artificially extended their nationality to nations of another independent State and which could be misused for purposes or partial or complete absorption of the population of such other state.[613]

[613] UN General Assembly. Topical summary of the discussion held in the Sixth Committee of the General Assembly during its fiftieth session prepared by the Secretariat, UN Doc. A/CN.4/472/Add. 1 (1996), para 10.

Since both Russia and Hungary began conducting extraterritorial naturalisations, international bodies and the states in which these practices are conducted have reacted, sometimes assertively, while at other times the reaction has been muted or even in some cases, non-existent. This chapter, using empirical data collection in the form of statements made by representatives of international bodies relevant to the phenomenon and personal interviews conducted with, and official statements made by, politicians in the states in which the extraterritorial naturalisations are conducted will highlight the criticisms of this practice, thereby providing insight into the perception of the intent of the naturalising state from the perspective of the 'home state'. It will also show variance in the 'home state' response, driven primarily by the circumstances of the relationship with the naturalising state or the predicted consequence of the naturalisations on the 'home state'.

Criticisms of Russia

The extraterritorial naturalisations conducted by Russia have been subject of protestation and criticisms from international bodies and the states in which the naturalisations have been conducted. In the Baltic States, the objections to Russian activities has predominately affected bi-lateral relations between the states involved, rather than at the international body level. Georgia, Ukraine, and Moldova have been fierce in their objections, often raising these at the international bodies level.

Found in Peters, "Extraterritorial Naturalizations: Between the Human Right to Nationality, State Sovereignty and Fair Principles of Jurisdiction."

International body protestations

The UN Security Council, the Council of Europe, the OSCE, and the EU have all been outspoken that Russian extraterritorial naturalisation practices have violated Georgia's territorial integrity. The Independent International Fact-Finding Mission on the Conflict in Georgia (Tagliavini Commission) stated that the,

> mass conferral of Russian citizenship to Georgian nationals and the provision of passports on a massive scale on Georgian territory, including its breakaway provinces, without the consent of the Georgian government, runs against the principle of good neighbourliness and constitutes an open challenge to Georgian sovereignty and interference in the internal affairs of Georgia.[614]

The report includes findings that these practices are illegitimate given the lack of Georgian consent.

> The issuance of passports is an act based on governmental authority. To the Mission's knowledge, the passports were in many cases distributed on the territory of the breakaway entities. To the extent that these acts have been performed in Georgia without Georgia's explicit consent, Russia has violated the principle of territorial sovereignty.[615]

The report concludes that the Russian extraterritorial naturalisation practices were part of an 'ethnic cleansing' of Georgians from the regions, eventually leading to military conflict. The OSCE High Commissioner on Ethnic Minorities, Mr Knut Vollebaek, criticised the 'forced passportization' of Georgian citizens in Abkhazia and South Ossetia as he drew a direct line between the extraterritorial naturalisations and forced migration and the increase of internationally displaced persons.

> After the ethnic cleansing of Georgians in these two regions [Abkhazia and Tskhinvali regions] in [the] early 1990s, en masse distribution of Russian passports to the remaining civilian population represented a deliberate and well-constructed policy

[614] Note 12. Tagliavini, "Independent International Fact-Finding Mission on the Conflict in Georgia."
[615] Ibid.

> aimed at establishing a pretext of the military intervention of the Russian Federation on the territory of Georgia [in August 2008].[616]

Accordingly, the Parliamentary Assembly of the Council of Europe recommended Russia to 'cease with activities, such as the issuing of Russian passports to inhabitants of the Georgian regions of Abkhazia and South Ossetia, which may – directly or indirectly – undermine these countries' [Russia and Georgia] sovereignty and territorial integrity.[617] Likewise, the Russian extraterritorial naturalisations in Ukraine have been criticised by international bodies and states. For example, the US Department of State released a statement on 29 June 2019:

> The US condemns today's decision by President Putin to provide expedited Russian citizenship to Ukrainians living in Russia-controlled eastern Ukraine. Russia, through this highly provocative action, is intensifying its assault on Ukraine's sovereignty and territorial integrity.[618]

Acting Chair of the US Mission to the OSCE stated:

> On 1 May [2019], Russia announced it would also expedite citizenship procedures for Crimean-born Ukrainians who left before the Russian occupation. Russia also announced the forcible imposition of Russian citizenship on the residents of the peninsula. These actions are an attempt to drive a wedge between Ukrainian citizens and their government. They create a serious obstacle to the implementation of the Minsk agreements and the reintegration of the Donbas region and represent another attempt by Russia to undermine Ukraine's sovereignty over Crimea and the Donbas.[619]

On 20 June 2019, the European Council issued a statement criticising Russian activities in Donbas:

> The European Council expresses its utmost concern about the Russian presidential decree of 24 April, enabling the simplified issuing of passports in certain areas of

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[616] Council of the European Union, "Independent International Fact-Finding Mission on the Conflict in Georgia," (2009), 187.
[617] Parliamentary Assembly of the Council of Europe, "Honouring of Obligations and Commitments by the Russian Federation. Resolution 1455," http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-en.asp?fileid=17354&lang=en.
[618] US Embassy in Ukraine, "Russia's Decision to Grant Expedited Citizenship to Residents of Russia-Controlled Eastern Ukraine," https://ua.usembassy.gov/russias-decision-to-grant-expedited-citizenship-to-residents-of-russia-controlled-eastern-ukraine/.
[619] US Mission to the OSCE, "Ongoing Violations of International Law and Defiance of OSCE Principles and Commitments by the Russian Federation in Ukraine," https://osce.usmission.gov/on-russias-ongoing-violations-in-ukraine-18-2-2-2-2-2/.

> Ukraine's Donetsk and Luhansk regions, which runs counter to the spirit and the objectives of the Minsk agreements.[620]

Accordingly, the European Commission and the European External Action Service, in coordination with Ukraine and the US, advised its member states to refuse to recognise the validity of Russian passports issued in Donbas.[621] The European Union's spokesperson on the issue of Russian involvement in Eastern Ukraine stated:

> The signature by President Putin of a decree entitling, *inter alia*, people who permanently reside in certain areas of Ukraine's Donetsk and Luhansk regions to apply for Russian citizenship in a simplified manner, is another attack on Ukraine's sovereignty by Russia. The timing of such a decision immediately after Ukraine's Presidential election, which demonstrated Ukraine's strong attachment to democracy and the rule of law, shows Russia's intention to further destabilise Ukraine and to exacerbate the conflict. We expect Russia to refrain from actions that are against the Minsk agreements and impede the full reintegration of the non-Government controlled areas into Ukraine. All parties must fully implement their commitments under the Minsk agreements. The European Union remains steadfast in its support to Ukraine's independence, sovereignty and territorial integrity.[622]

The Parliamentary Assembly of the Council of Europe criticised Russian extraterritorial naturalisations in all territories, including Transnistria, by stating the practice 'violated the territorial integrity of these states, as recognised by the international community, including the Parliamentary Assembly.'[623]

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[620] European Council, "European Council Meeting (20 June 2019)," https://www.consilium.europa.eu/media/39922/20-21-euco-final-conclusions-en.pdf.
[621] European Commission, "EU Guidance on the Handling of Visa Applications from Residents of Ukraine's Donetsk and Luhansk Regions," https://ec.europa.eu/commission/presscorner/detail/en/IP_19_5975.
[622] European Union External Action, "Statement by the Spokesperson on the Russian Decree Enabling the Simplified Issuing of Passports in Certain Areas of Ukraine's Donetsk and Luhansk Regions," https://eeas.europa.eu/headquarters/headquarters-homepage/61444/statement-spokesperson-russian-decree-enabling-simplified-issuing-passports-certain-areas_en.
[623] Paragraph 18. Parliamentary Assembly of the Council of Europe, "Honouring of Obligations and Commitments by the Russian Federation. Resolution 1896," http://assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-en.asp?fileid=19116&lang=en.

State protestation

All the states in which Russia conducts extraterritorial naturalisations have protested against the practice, albeit through different channels and varying potency.

Georgia

Since Russian extraterritorial naturalisations began in Abkhazia and South Ossetia, the Georgian state have viscerally protested against these practices through various channels.

> We expressed our protest, and we applied to the Russian Ministry of Foreign Affairs and presented our protest notes, Georgia applied to the OSCE, the Council of Europe, the United Nations, claiming that what Russia is doing now is a blatant, brazen violation of every international rule and practice. ... Informal bodies are not allowed to issue passports or collect applications, no technicalities, but simple.[624]

From the Georgian state's perspective, the Russian extraterritorial naturalisation practices in the breakaway states of Abkhazia and South Ossetia is a clear violation of Georgian sovereign territory. Georgian foreign ministers persistently raised the issue with their Russian counterparts through diplomatic channels.[625] Former Georgian Foreign Minister Irakli Menagarishvili presented protests at the UN General Assembly 17th plenary meeting on 19 September 2002.[626] Former Secretary of the National Security Council of Georgia and current Georgian Ambassador to Russia, Alexander Lomaia argued that the extraterritorial naturalisations were conducted illegally, and unilaterally and that 'passports were

[624] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[625] Ibid.; Personal interview with Ambassador Tedo Jeopardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/
[626] UN General Assembly, "Fifty-Seventh Session. 17th Plenary Meeting. Thursday, 19 September 2002, 3 P.M. New York," https://undocs.org/en/A/57/PV.17.

disseminated simply to create a quasilegal justification for claiming that R2P (Responsibility to protect) had to be applied.'[627]

Ukraine

The Ukrainian state has challenged the Russian extraterritorial naturalisation practices in Donbas, and the conflict between the two states, of which extraterritorial naturalisations is a factor, is ongoing. Ukraine has been working closely to mitigate the effect of the Russian extraterritorial naturalisations.

> Russia started issuing passports in the Krasnodar region. So logically thinking the EU and the US should ban the passports from the Krasnodar region, but there was a bureaucratical issue, in the text of the document was written, just the Autonomous Republic of Crimea. Ukraine did it the other way, it just chose not to recognise the passports in certain regions, but the list of locations can change. In one or two days' time, Ukraine can change the situation easily, so if the passports are given out in Moscow, we can add Moscow to the list, but for the EU and the US to make changes in their documents, it can be a long bureaucratic process which can take years.[628]

In a tit-for-tat move, the Ukraine government implemented a law, shortly after the new Russian Federation's decree that allowed for the extraterritorial naturalisations in Donbas, that that centralised Ukrainian as the only official language in Ukraine, meaning all work by civil servants, soldiers, doctors and teachers have to work in Ukrainian as well as strict minimum levels of Ukrainian imposed on media in the state. This 'language law' has been criticised by the European Council's Venice Commission for failing to safeguard minorities' linguistic rights.[629]

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[627] "63rd Session, 101st Plenary Meeting, on 29 July 2009, New York," https://undocs.org/A/63/PV.101.
[628] Personal Interview with Georgiy Tuka - Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons in Kyiv, Ukraine on 6 June 2019. See Interview_ID_17_Georgiy_Tuka at https://reshare.ukdataservice.ac.uk/854598/
[629] Council of Europe, "State Language Law of Ukraine Fails to Strike Balance between Strengthening Ukrainian and Safeguarding Minorities' Linguistic Rights, Says Venice Commission," news release, 6 December 2019, 2019, https://search.coe.int/directorate_of_communications/Pages/result_details.aspx?ObjectId=09000016809933ef.

The Baltic States

The Latvian Ministry of Foreign Affairs suggests that the extraterritorial naturalisations in the state have negatively affected the relationship between Russia and Latvia:

> Through the years we have certain difficulties in our bilateral relations because of historical and political reasons, including the necessity to provide an alternative for Russia's so-called 'Compatriots Policy' that has a significant impact on people-to-people contacts.[630]

The Estonian state explicitly frames dual citizenship with Russia as a security threat. The logic of this was explained by the head of the Estonian Citizenship and Migration department:

> It is logical that a citizen is loyal to the state of citizenship and it is logical that a person shares the ideology of the state of citizenship and says that yes, the internal policy is ok, the foreign policy is ok. Yes, they share the mindset and rhetoric and ideology. If a person has two citizenships, and the ideology of the states is conflicting the person cannot have two competing mindsets Carrying out the rights and obligations of an Estonia citizenship, sharing the mindset and ideology of Estonia, but carrying out the rights and obligations of a Russian citizen, having another mindset, a person can change only one mindset. It could be either, but we do not know that. Basically, we say that a person's loyalty is undividable in case their ideology is conflicting. Then a person has to choose. It could happen easily that a person with dual citizenship, that they carry out the rights and obligations of an Estonian citizenship with the mindset of a Russian citizenship. It might, in certain cases, pose a threat to state security.[631]

The Estonian state's security service highlights Russia's intent with regards to the Russian Compatriot Policy:

> Russia's aim is not to maintain cultural links with these people nor invite them to return to Russia. Rather its goal is to influence the sovereign decisions of other countries and to divert attention away from its own problems through the manipulation of these groups.[632]

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[630] Personal interview with the Latvian Ministry of Foreign Affairs in Riga, Latvia on 26 April 2019. See Interview_ID_05_Latvian_MFA at https://reshare.ukdataservice.ac.uk/854598/
[631] Personal interview with Ruth Annus - Estonian Head of Citizenship and Migration Policy in Tallinn, Estonia on 3 May 2019. See Interview_ID_02_Ruth_Annus at https://reshare.ukdataservice.ac.uk/854598/
[632] Security Police of the Republic of Estonia, "Annual Review," (2011).

A similar sentiment was expressed in an interview with the Latvian Ministry of Foreign Affairs:

> The overall approach is that dual citizenship with Russia is not allowed. No one is hiding it. The reason is because it is a national security threat. We have to remember that Russia is now conducting an aggressive foreign policy approach, and one of the instruments of this foreign policy, are the Russian citizens living in foreign countries. Basically, we tried to avoid the situation where Russian citizens are becoming more numerous inside our country as they can gain more influence through them.[633]

Moldova

The ongoing political support from the Kremlin for Transnistria has strained Russian-Moldovan relations considerably.[634] The Moldovan state has expressed its objections about many issues relating to Russian support for the breakaway state, particularly the issuance of Russian citizenship to the population in Transnistria.[635] Moldova has repeatedly refused to allow Russia to open a consulate in Tiraspol, meaning Russian extraterritorial naturalisations are conducted by delegates who regularly travel to Transnistria to process the applications.[636] Nevertheless, Moldova's objections to Russia's extraterritorial naturalisation practices in the breakaway state of Transnistria are far less severe than those in Georgia or Ukraine, perhaps given the complicated nature of the frozen conflict, as well as many Transnistrians, holding multiple citizenships: Moldovan, Ukrainian, Romanian, and Russian – meaning attribution of blame is shared.

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[633] Personal interview with the Latvian Ministry of Interior – The Office of Citizenship and Migration Affairs in Riga, Latvia on 7 May 2019. See Interview_ID_06_Latvian_OCMA at https://reshare.ukdataservice.ac.uk/854598/

[634] John Beyer and Stefan Wolff, "Linkage and Leverage Effects on Moldova's Transnistria Problem," *East European Politics* 32, no. 3 (2016).

[635] Leo Litra, "Looking in the Mirror: What Transnistria Tells Us About Donbas?," New Europe Center, https://rpr.org.ua/en/news/looking-in-the-mirror-what-transnistria-tells-us-about-donbas/.

[636] Nagashima, "Russia's Passportization Policy toward Unrecognized Republics: Abkhazia, South Ossetia, and Transnistria."

Criticisms against Hungary

Hungarian extraterritorial naturalisations have been criticised by international bodies, particularly within the EU, and the states in which the naturalisations are conducted.

International body protestations

The OSCE National Monitories Commissioner raised concerns about extraterritorial naturalisations conducted by Hungary, by issuing the following recommendations:

> principles of good neighbourliness and friendly relations should be taken into account when pursuing policies affecting citizens of another state. Contested claims of competing attempts by the States to exercise jurisdiction over their citizens, irrespective of their place of residence, have the potential to create tensions. It is for this reason that I have cautioned states against granting citizenship on the mere basis of ethnic, national, linguistic, cultural, or religious ties and urged them to give full consideration to the consequence of granting citizenship. This is particularly true if citizenship is conferred on residents of a neighbouring state residing there in substantial numbers. It is clear that granting citizenship *en masse* could have a destabilising effect and should be discouraged.[637]

The European Parliament's rapporteur, Eric Jürgens, in his report on Hungarian Status Law that proceeded and ultimately enabled Hungarian extraterritorial naturalisations suggested the law implemented by Hungary was 'discriminatory and has extraterritorial implications and recommended that Hungary should rescind the Law.'[638] The High Commissioner on National Minorities for the OSCE, Rolf Ekeus, raised issues with the Hungarian Status Law, stating:

> History shows that when States take unilateral steps on the basis of national kinship to protect national minorities living outside of the jurisdiction of the state, this sometimes leads to tensions and frictions, even violent conflict. I am therefore obliged to focus special attention on situations where similar steps, without the consent of the state of

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[637] Organization for Security and Co-operation in Europe (OSCE) High Commision on National Minorities, "OSCE National Minorities Commissioner Discusses Hungarian Citizenship Law with Slovak Foreign Minister," OSCE, https://www.osce.org/hcnm/69329.
[638] Parliamentary Assembly of the Council of Europe, "Preferential Treatment of National Minorities by the Kin-State: The Case of the Hungarian Law of 19 June 2001 on Hungarians Living in Neighbouring Countries ("Magyars")," http://assembly.coe.int/nw/xml/XRef/X2H-Xref-ViewHTML.asp?FileID=10094&lang=EN.

> residence, are contemplated. ... a legal regime has been developed following the principle that protection of human rights and fundamental freedoms, including for persons belonging to national minorities, is the responsibility of the state having jurisdiction with regard to the persons concerned. This is not only a cornerstone of contemporary international law and a requisite for peace, it is necessary for good governance, particularly in multi-ethnic States. ... It is a basic principle of international law that the state can act only within its jurisdiction which extends to its territory and citizenry. Although a State with a titular majority population may have an interest in persons of the same ethnicity living abroad, this does not entitle or imply, in any way, a right under international law to exercise jurisdiction over these persons. … States should be careful not to create such privileges for particular groups which could have disintegrative effects in the States where they live.[639]

The Venice Commission stated:

> when the law specifically aims at deploying its effects on foreign citizens in a foreign country abroad, its legitimacy is not so straightforward. It is not conceivable, in fact, that the home-state of the individuals concerned should not have a word to say on the matter ... In such form, this document… creates a political bond between these foreigners and their kin-state. Such a bond has been an understandable cause of concern for the kin home-states which, in the Commission's opinion, should have been consulted prior to the adoption of any measure at creating the documents in question.[640]

State protestation

As will be detailed below, some states have protested to Hungary's extraterritorial naturalisation practices. Some within Hungary have criticised Viktor Orbán's framing of the history of the Hungarian nation and the Treaty of Trianon.

> Some of the rhetoric surrounding this policy has revolved around the position that Hungary and the former Kingdom of Hungary was a homogeneous country ethnically. This is simply not true. We estimate that before Trianon, 51 per cent of the population were ethnically Hungarian. What about the other 49 per cent? Do they not matter? Are they not there? Not according to Fidesz. This rhetoric is flawed but powerful. Some people are easily swayed by this. Some even believe that Mr Putin will give Hungary a piece of Ukraine. [641]

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[639] The OSCE, The Hague, The Netherlands, 26 October 2001 in ibid.
[640] European Commission for Democracy Through Law (Venice Commission), "The Protection of National Minorities by Their Kin-States."
[641] Personal interview with Interview with former Liberal Hungarian MP Ms. Erika Torsok in Budapest, Hungary on 26 May 26 2017. See Interview_ID_38_Erika_Torsok at https://reshare.ukdataservice.ac.uk/854598/

Referring to the extraterritorial naturalisation practice specifically, '[the Hungarian Democratic Coalition (DK) party] were the only ones to openly question the legitimacy of the citizenship and enfranchisement process.'[642]

The Hungarian extraterritorial naturalisations did not provoke reactions from all the states in which they were conducted. In Romania, which has the largest population that would be eligible for Hungarian citizenship, has not recently released any statement that appears to criticise Hungarian actions in this realm. Likewise, there has not been a critical reaction from the Serbian leadership against Hungarian actions. The reasons for this are twofold: firstly, the bilateral relations between Hungary and Romania and Hungary and Serbia are strong enough that the relevant parties wish to avoid jeopardising a deterioration of these relations by objecting to the practice. Secondly, it is a possibility that the Romanian and Serbian states see a benefit from the extraterritorial naturalisations of Hungarians living in these states, whether political or economic. The Serbian state also sees Hungary as a key partner in supporting future EU membership bids. Relations, however, change and Romania might be worried about the direction Hungarian foreign policy is taking. 'Viktor Orbán and Vladimir Putin have a good relationship, Romania thinks that we play into the Russian agenda.'[643]

However, the Hungarian extraterritorial naturalisations have provoked diplomatic tit-for-tat feuds in between the Hungarian government and Slovakia, and Ukraine respectively.

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[642] Personal interview with István Székely researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[643] Personal interview with István Székely – Executive Vice President of RMDSZ in Cluj-Napoca on 27 May 2019. See Interview_ID_20_István_Székely at https://reshare.ukdataservice.ac.uk/854598/

Slovakia

The most notable reaction to Hungarian extraterritorial naturalisations came from the Slovakian state almost immediately after Hungarian Fundamental Law was modified in 2010, thus removing residency as a pre-requisite for simplified naturalisation. The response was explicit; the Slovakian prime minister, Robert Fico, referred to Hungary's decision to conduct extraterritorial naturalisations as a 'security threat'.[644] In the Slovakian parliament, he asserted that Hungary was engaging in attempts to revise history and an ignorance of the bilateral treaty between the two states.[645] The counter-legislation came into force on 26 May 2010, the day the Hungarian bill came into effect, in a continuation of the tit-for-tat diplomatic feud between the two states. Slovakia's legislation amended the Slovakian Citizenship Act by effectively prohibiting the acquisition of another state's citizenship by automatically revoking Slovak citizenship from those that have 'by an act of will' acquired another state's citizenship that is neither by marriage or birth.[646] The debate preceding the implementation of this legislation was intense; Ján Slota, the leader of the Slovak National Party (SNS) at the time, argued that Hungarian citizens act as enemies of the state should be deported.[647] The leader of the People's Party – Movement for a Democratic Slovakia (HzDS), Vladimir Mečia, framed the diplomatic crisis as a 'third war in Central Europe', instigated by Viktor Orbán and Hungary.[648]

Fears of irredentism are prominent in the Slovakian concerns about Hungarian intentions, 'the Slovakian state does fear Hungarian involvement. They are particularly

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[644] BBC News, "Slovaks Retaliate over Hungarian Citizenship Law," https://www.bbc.co.uk/news/10166610.
[645] Euractiv, "Hungary Citizenship Law Fuels Slovak Resentment," https://www.euractiv.com/section/languages-culture/news/hungary-citizenship-law-fuels-slovak-resentment/.
[646] Article 9(16), Act of 26 May 2010, which amends Act of the National Council of the Slovak Republic No/1993 Coll. On Citizenship of the Slovak Republic, as amended. National Council of the Slovak Republic, "Act on Nationality," https://www.minv.sk/?informacia-o-udeleni-a-strate-statneho-obcianstva-sr&subor=21104.
[647] Dagmar Kusa, "Slovak Parliament Reacts to Hungarian Citizenship Reform with Restrictions on Dual Citizenship," *EUDO Citizenship News* (2010).
[648] Ibid.

worried that there will be an attempt to change the borders and of destabilisation attempts.'[649] This response can partly be explained by geographical circumstances, 'in the case of Slovakia ... the majority of the Hungarians live right near the border; this could be why the country is not keen on dual citizenship.'[650] The deputy mayor for Komárno on the Slovakian/Hungarian border explains, 'this territory [Komárno on the Slovakian/Hungarian border] used to be Hungarian, of course, and Hungary would like to get back again. That is not an issue anymore for NGOs or politicians; they do not speak about it anymore.'[651]

For Slovakia, perceived threats to sovereign territorial integrity are taken seriously; 'the concept of sovereignty has changed in Romania, and the Romanians have moved towards a de-territorialised concept of sovereignty. It is not the same in Slovakia, where this is a sovereignty issue.'[652]

Ukraine

Initially, the reaction in Ukraine to the changes to Hungarian legislation that enabled extraterritorial naturalisations were relatively limited. There were, however, some protestations. The Zakarpattia branch of the Committee of Defence of Ukraine on 25 June 2010 classified the Hungarian law as 'carrying a threat to the national security of Ukraine.'[653]

Later, as diplomatic relations between the two states deteriorated, so did Ukrainian tolerance of Hungarian interventions in Zakarpattia. On 4 October 2018, Hungary and

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[649] Personal interview with Géza Tokár, Spokesperson of the Roundtable of Hungarians in Slovakia, in Budapest, Hungary on 25 May 2017. See Interview_ID_48_Géza_Tokár at https://reshare.ukdataservice.ac.uk/854598/

[650] Personal interview with István Székely – Executive Vice President of RMDSZ in Cluj-Napoca on 27 May 2019. See Interview_ID_20_István_Székely at https://reshare.ukdataservice.ac.uk/854598/

[651] Personal interview with Béla Keszegh, Deputy Mayor for Komárno, in Komárno, Slovakia on 26 June 2017. See Interview_ID_52_Béla_Keszegh at https://reshare.ukdataservice.ac.uk/854598/

[652] Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[653] Oxana Shevel, "Ukraine: Reactions to the Hungarian Citizenship Law," *EUDO Citizenship News, Monday* 12 (2010).

Ukraine expelled each other's diplomats in an escalation of a row over a video released in the Ukrainian press showing a Hungarian naturalisation ceremony in Berehove, Zakarpattia, along with Hungarian protestation against Ukrainian language laws that they argued are oppressive against the Hungarian minority in Ukraine.[654]

Diplomatic relations between Ukraine and Hungary are still strained. This relationship was further stressed when a video circulated on social media showing a naturalisation ceremony in Berehove, Ukraine, followed by a public backlash and political condemnation of the practice.

> When the conflict started last year, the Ukrainian authorities amended the new law about education. This was when the constitutional rights regarding language of the national minorities were violated. After adopting this law, conflicts between Hungary and Ukraine started. This video from Berehove, where the people involved pledge allegiance to Hungary in the Hungarian consulate, was at the secret service for a year before publishing. They were waiting for the right moment. I think there are many other videos like this. But this was the territory of the consulate, meaning the territory of Hungary, where we can do whatever we want, so why are they asking questions? As of now, you can go to Berehove, you can apply for the documents, but to pledge allegiance you need to go to Hungary, to avoid a scandal. In any village committee, you can pledge allegiance to Hungary.[655]

On 3 December 2019, the Russian State Duma speaker, Chairman Vyacheslav Volodin, further added to the diplomatic row between the Hungary and Ukraine by claiming, 'the Hungarian Parliament asked the State Duma to join forces to defend minority rights.'[656]

The Governor of Zakarpattia, Yaroslav Halas, expressed his opinion on Hungarian extraterritorial naturalisation practices:

> The Hungarian doctrine is to support their diaspora, by any means possible, even if it means quarrelling with other presidents, even if it is illogical. Slovakia is an EU member; they do not need to make their lives easier; it was just a doctrine, way before [the] war in Donbas. Those who do not follow the story, they think that Orbán was

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[654] Natalia; Dunai Zinets, Marton, "Ukraine, Hungary Expel Consuls as Passport Row Deepens," Reuters, https://www.reuters.com/article/us-ukraine-hungary/ukraine-hungary-expel-consuls-as-passport-row-deepens-idUSKCN1ME0V0.
[655] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/
[656] Vyacheslav Volodin, "Hungarian Parliament Asks to Join Efforts to Protect the Rights of Linguistic Minorities," Duma TV, https://dumatv.ru/news/parlament-vengrii-poprosil-gosdumu-obedinit-usiliya-po-pravam-menshinstv.

> inspired by Putin, but he himself is quite an emotional person, who does something despite of the quarrels it creates with Poroshenko.[657]

Despite these protestations, Viktor Orbán has defended his policies by explaining his position,

> We do not see state borders as any kind of starting point. We have to live with their existence, but do not see them as a starting point when we define, say, the scope and validity of our economic policy. Earlier this way of thinking was generally perceived by all our neighbouring countries as a hostile idea aimed against them. They branded this economic approach by Hungary – of thinking in terms of the Carpathian Basin – as an intellectual tendency which ran counter to their own economic interests.[658]

Bohdan Yaremenko, the Foreign Policy Advisor to President Zelensky of Ukraine, when speaking about Viktor Orbán, states, 'I consider him very, very dangerous.'[659]

Conclusion

The extraterritorial naturalisations conducted by Russia and Hungary have been met with mixed reactions, ranging from severe – contributing to armed conflict – to supportive – where the 'home state' tolerates the practice. Many international bodies, particularly within the European Union, have expressed concerns of extraterritorial naturalisations and the intentions that drive them; these concerns centre on the potential threat to the states' sovereign territorial integrity in which they are enacted.

The Georgian and Ukrainian states have been the most vocal opponents to Russian extraterritorial naturalisations, partly explained by the two states' recent military conflict with the Russian Federation and the role extraterritorial naturalisations played within these conflicts. The Baltic States, shielded by NATO and the EU's protective powers, fear Russian

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[657] Personal Interview with Yaroslav Halas - Governor of Zakarpattia in Uzhhorod, Ukraine on 22 May 2019. See Interview_ID_16_Yaroslav_Halas at https://reshare.ukdataservice.ac.uk/854598/
[658] Orbán, "Prime Minister Viktor Orbán's Address at the 15th Plenary Session of the Hungarian Standing Conference. 1 December 2016".
[659] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine In Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/

extraterritorial naturalisation practices in their states and have objected and protested accordingly. The Moldovan state has been far less vocal in opposing Russian extraterritorial naturalisations, partly given the complex nature of the relationship between the Russian and Moldovan states and given that other countries are also involved in the breakaway state.

Regarding Hungarian extraterritorial naturalisations, the starkest reaction has come from Slovakia, who introduced counter legislation prohibiting dual citizenship within the state. The Ukrainian state has too objected to the practice. However, in Romania and Serbia, there has been little to no objection to the practice. The Serbian state sees the benefit from a favourable relationship with the Hungarian state and has welcomed the injection of funds that have followed the extraterritorial naturalisations. The Romanian state also sees use from allowing the Hungarian state to channel funding into Romania, in part because it reduces the financial responsibility on the Romanian state towards these minority communities and because the regions in which most of the extraterritorial naturalisations have been conducted are some of the poorest in the state.

The existence of state protestation to extraterritorial naturalisation does not necessarily equate to an underlying strategic intent, but it does reflect the perception of threat or motivating factors behind the reason to conduct extraterritorial naturalisations. The differences in responses from the 'home states' can be explained by a combination of factors, namely the perceived loss from the rival states' policy, structural considerations, i.e. membership of NATO or EU, the existing relationship between the 'home state' and naturalising state, and past experiences. The next chapter will show how Russia and Hungary have intended to make strategic gains from the extraterritorial naturalisations across various dimensions.

Chapter 6: The Strategic Intent and Impact of Russian Extraterritorial Naturalisations

The preceding chapters have detailed how, when, and under what conditions Russia and Hungary have conducted extraterritorial naturalisations and how states and other institutions have responded. The last chapter demonstrated the protestations by sovereign 'home states' and international organisations, suggesting that there is a fear over the intent and impact of extraterritorial naturalisation.

This chapter dealing with Russia, and the following chapter with Hungary, will address in greater depth the strategic element of Russian and Hungarian extraterritorial naturalisation practices and how these two states have made strategic gains from the practice. For Russia, this chapter will first deal with the meaning found in the absence of extraterritorial naturalisations in specific locations, before showing that the extraterritorial naturalisations have been conducted with the following aims: 1) to destabilise the 'home state', 2) political meddling via a 'fifth column', 3) to reverse the demographic decline in Russia, 4) as an overt projection of state power and institutional capacity to generate domestic support, and 5) to collect political 'bargaining chips' that can be later utilised in diplomatic negotiations or during conflict. The chapter will provide empirical evidence for each strategic gain made by Russia by using data gathered through personal interviews conducted with politicians in the states where Russia conducts their extraterritorial naturalisations.

The revealing absences in Russian extraterritorial naturalisations

Russian extraterritorial naturalisations have not been conducted uniformly across all populations that would *prima facie* fit the applicable applicants' profile, implying a strategic

decision-making process behind the practice. Several states in the post-Soviet space, populated by various types of Russians: ethnic Russians, Russophones, or Russian Compatriots, have not had their citizens naturalised by the Russian Federation. For instance, if we focus on the ethnic Russians in the post-Soviet territories, 3,793,764 ethnic Russians live in Kazakhstan,[660] 706,992 in Belarus,[661] 364,600 in Kyrgyzstan,[662] 500,000 in Uzbekistan,[663] and 100,000 in Turkmenistan.[664] These are large numbers that could easily be incorporated into the Russian Federation's state polity. However, in these states, Russia has not conducted collective extraterritorial naturalisations as it has done elsewhere. Of course, as this thesis has shown, Russian ethnicity is not a pre-requisite for extraterritorial naturalisation.[665] However, it is has been used as a criterion to determine who can be naturalised by the Russian Federation.[666] Russia's relationship with the former-Soviet Union republics is complicated, but it is relatively stable with all the states listed above. Therefore, it is likely that the absence of Russian extraterritorial naturalisations in these states can be explained by Russia's perception that these populations, and territories, lack strategic benefit to the Russian Federation. Alternatively, if there were a strategic value, it would not be worth pursuing because of the detrimental effect this would have on the relationship between the Russian Federation and these states. For instance, in Belarus, it is conceivable that the Russian Federation could benefit from naturalising the ethnic Russian population there to address a demographic decline and have more Russian citizens on the border of the European Union.

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[660] The Agency of Statistics of the Republic of Kazakstan, "Results of the 2009 National Population Census of the Republic of Kazakhstan," https://dataspace.princeton.edu/bitstream/88435/dsp016m311r73m/1/DSKazakhstancensus2009.pdf.
[661] National Statistical Committee of the Republic of Belerus, "Total Population, Population by Age and Sex, Marital Status, Level of Education, Nationalities, Language, Sources of Livelihood in the Republic of Belarus," https://www.belstat.gov.by/ofitsialnaya-statistika/solialnaya-sfera/naselenie-i-migratsiya/naselenie/statisticheskie-izdaniya/index_17854/.
[662] Paul Goble, "Ethnic Russians Leaving Central Asia and with Them, Putin's Hopes for Influence'," *Eurasia Daily Monitor* 13, no. 22 (2016).
[663] Ibid.
[664] Ibid.
[665] In Abkhazia, for instance, during the second wave of Russian extraterritorial naturalisations, many who were naturalised were not ethnically Russian.
[666] In the Baltic States, Crimea, Donbas, for example.

However, it probably does not consider it likely that Belarus is close to fostering a closer relationship with Russia's rivals, and therefore does not pursue extraterritorial naturalisations and upsetting their allies. Likewise, the Russian Federation has a strong relationship with trading partner Kazakhstan[667] and has not conducted extraterritorial naturalisations on this territory.

The absence of extraterritorial naturalisations in territories with potentially favourable conditions for the practice indicates a strategic decision-making process. There is geographical variation across potential sub-cases and implies that a decision has been taken where to naturalise and where not to; this decision is evidence of a systematic strategic pursuit.

Emotive particularism

On 25 May 2011, according to a law of the President of the Russian Federation, a national fund was established to defend and support the rights of Russian Compatriots living abroad. The fund was founded by the Russian Foreign Ministry and the affiliated national agency 'Rossotrudnichestvo' that handles relations with CIS countries, Compatriots living abroad and international humanitarian cooperation. The fund receives most of its financing from the Russian state budget.[668] One counter-argument to the suggestion that extraterritorial naturalisations are conducted strategically is that the practices manifest the state's sense of responsibility towards 'their' people abroad. To be clear, asserting that there is strategic instrumental intent behind the policy is not dismissing the emotional argument entirely; instead, it argues that this is not sufficient to explain the practices. In other words, 'Russia has

[667] Viachaslau Yarashevich, "Post-Communist Economic Integration: Belarus, Kazakhstan, and Russia," *Journal of Economic Integration* (2014).
[668] Security Police of the Republic of Estonia, "Annual Review."

proved it uses citizenship as a means to fulfil their political goals.'[669] However, some interviewed for this thesis were more visceral in dismissing any emotional reasoning for these extraterritorial naturalisations. 'Do not make any mistake. There is no caring, do they [Russia] care about someone's future? Of course not. ... They have no ideological, spiritual basis for their policies.'[670] Vytis Jurkois stated in a personal interview that, '[Russia use these practices to] basically to mess around in the neighbourhood. ... To use, manipulate, instrumentalise, weaponize citizenship ... they do not have any interest in the citizens of the Russian Federation.'[671] The Chairman of the Estonian Foreign Affairs Committee, Marko Mihkelson, reiterates this position,

> They [Russia] do not care about people. They [Russia] never did. This is something again that is one of the miscalculations of our Western governments. ... they do not care about human lives. ... This is only a very brutal calculation, one of many, how to use, achieve many goals of state interest. ... [The] defence of the rights of those people [ethnic Russians] is not the ultimate goal of Russia. It is a tool to achieve something else ... to pay back for the humiliation of collapse of [the] Soviet Empire. To dismantle United States supremacy in this world, and part of that, one of the symbols is NATO of course, and if NATO is broken, then this automatically de-links the US from Europe and trans-Atlanticism.[672]

Boriss Cilivecs, an ethnic Russia Latvian MP of the political party Harmony, echoes this sentiment in his assessment of Russian interest in Latvia.

> Russian Federation is not interested in strong Russian communities here [Latvia]. Russian propaganda is interested in showing Russians being prosecuted and oppressed to facilitate internal consolidation. They know this feeling about being surrounded by the enemy, by a hostile world. Now the official line is, 'what can we do for you? We can evacuate you. We can protect you.'[673]

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[669] Personal interview with Kristina Kallas – a politician of the Estonian political party, Eesti 200, in Tallinn, Estonia on 4 May 2019. See Interview_ID_04_Kristina_Kallis at https://reshare.ukdataservice.ac.uk/854598/
[670] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[671] Personal interview with Vytis Jurkois - Head of Freedom House Vilnius in Vilnius, Lithuania on 16 May 2019. See Interview_ID_12_Vytis_Jurkois at https://reshare.ukdataservice.ac.uk/854598/
[672] Personal interview with Marko Mihkelson, Estonian Foreign Affairs Committee in Tallinn, Estonia on 30 April 2019. See Interview_ID_01_Marko_Mihkelson at https://reshare.ukdataservice.ac.uk/854598/
[673] Personal interview with Boriss Cilivecs - Latvian Harmony MP in Riga, Latvia on 9 May 2019. See Interview_ID_10_Boriss_Cilivecs at https://reshare.ukdataservice.ac.uk/854598/

The former Georgian Minister of Foreign Affairs, Irakli Menagarishvili, dismisses the emotional argument, highlighting its illegality. 'This [extraterritorial naturalisation] is a clear, criminal activity, using state papers with the purpose to set the environment leading to the tensions, military activities and violating the rights of the people of the former Soviet Union.'[674] Bohdan Yaremenko describes the extraterritorial naturalisations as 'an instrument for making people attached to Russia, to take instrumental control of them. For Russia, it has never been about supporting the ethnic Russians, but it was the political instrument of power.'[675]

Destabilisation, alliance blocking, and freezing conflicts

For the Russian Federation, blocking the potential alliances between 'Western' supranational bodies of the EU and NATO and Russia's contiguous neighbours is critical to Russian foreign policy. It is a primary objective of Russia to hinder Western encroachment into their perceived sphere of influence.[676] The extraterritorial naturalisations conducted by Russia have been pivotal in realising this objective. This section will demonstrate how extraterritorial naturalisations conducted in Georgia, Ukraine, and to a lesser extent, Moldova, enable Russia to realise this foreign policy objective.

EU and NATO rules on new membership prohibit any potential states with territorial disputes or internal conflict. Mr Hahn speaking on behalf of the European Commission asserts, 'the EU cannot and will not import bilateral disputes and the instability they can

[674] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[675] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine in Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/
[676] Yarashevich, "Post-Communist Economic Integration: Belarus, Kazakhstan, and Russia."

entail.'[677] Likewise, membership to NATO is contingent on a similar lack of conflict; the Washington Principles pertaining to new NATO members states:

> New members, at the time that they join, must commit themselves, as all current Allies do on the basis of the Washington Treaty, to: unite their efforts for collective defence and for the preservation of peace and security; settle any international disputes in which they may be involved by peaceful means in such a manner that international peace and security and justice are not endangered, and refrain in their international relations from the threat or use of force in any manner inconsistent with the purposes of the United Nations ... States which have ethnic disputes or external territorial disputes, including irredentist claims, or internal jurisdictional disputes must settle those disputes by peaceful means in accordance with OSCE principles. Resolution of such disputes would be a factor in determining whether to invite a state to join the Alliance.[678]

As mentioned previously in this thesis, the extraterritorial naturalisations conducted by Russia in Georgia, Ukraine and Moldova, have been one of the primary reasons for conflict in these countries. The Latvian Ministry of Foreign Affairs argued the following:

> Russia's aggressive foreign policy and constant efforts to destabilise the West has become a long-term pattern. Russia has fuelled continuous aggression in Eastern Ukraine, which severely damages the Russian global outlook and prospects for meaningful cooperation. So far, we have not seen constructive engagement from Russia in the de-escalation of the conflict in Eastern Ukraine and in the implementation of the Minsk agreements. Even worse, in November 2018, we observed Russia's aggressive actions against the Ukrainian vessels in the international waters near the Kerch Strait. Constructive relations are desirable, but progress is not possible while Russia does not show any willingness to establish a rule based international order. Currently, we do not see a possibility of resetting relations with Russia in terms of returning to 'business as usual'. Consequently, Latvia's bilateral relations with Russia are determined by the current EU two-track policy that includes a dialogue at the diplomatic level and EU sanctions.[679]

The Russian aggression and instigation of conflicts referred to by the Latvian MFA have contributed to hindering Russia's neighbours from forming closer relations with rival the political and military associations of the EU and NATO respectively.

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[677] European Commission, "A Credible Enlargement Perspective for and Enhanced EU Engagement with the Western Balkans," *Communication COM (2018) 65 final* (2018). However, it is worth noting that this rule has not been applied uniformly. Cyprus, for instance, became an EU member state in 2004, despite ongoing territorial disputes relating to Northern Cyprus. Frank Hoffmeister, *Legal Aspects of the Cyprus Problem: Annan Plan and EU Accession*, vol. 67 (Martinus Nijhoff Publishers, 2006).

[678] See NATO HQ, "Study on NATO Enlargement," *Brussels, September* (1995).: Chapter 1 - Purposes and Principles of Enlargement. Section B. Principles of Enlargement. Paragraph 5. https://www.nato.int/cps/en/natohq/official_texts_24733.htm

[679] Personal interview with the Latvian Ministry of Foreign Affairs in Riga, Latvia on 26 April 2019. See Interview_ID_05_Latvian_MFA at https://reshare.ukdataservice.ac.uk/854598/

Georgia

In Georgia, Russia's extraterritorial naturalisation of the Abkhaz and South Ossetian population had a ratcheting effect in the conflict, thus creating a real barrier to Georgia's plans to foster a closer relationship with the EU and to gain NATO membership. Before the Russian-Georgian conflict began in September 2006, NATO offered Georgia 'Intensified Dialogue' status in an attempt to consolidate this relationship.[680] The extraterritorial naturalisations of the populations in these breakaway states have meant that any potential reversal of the conflict between Georgia and the breakaway territories is unlikely. Unravelling the consequences becomes complicated; for example, one issue is the practicality of reissuing of Georgian documentation to Abkhazian and South Ossetian population's Georgian documentation has expired.[681] The Georgian government are still dealing with the consequences of Russian extraterritorial naturalisations in Abkhazia and South Ossetia; 'it created a wall between the Georgians and the non-Georgians who became Russian citizens, it made it more difficult to restore competence and to have these people incorporated into the Georgian system.'[682]

A former Minister of Foreign Affairs, Tedo Japardize, explains the reasoning behind Russia's involvement in Georgia, and specifically, Russian extraterritorial naturalisation practices on their sovereign territory,

> Russia decided to give Georgia a lesson. Keep us on a short leash. They tested first ... we heard this information that we checked officially with the Russian officials which

[680] NATO HQ, "Georgia Begins Intensified Dialogue with NATO," https://www.nato.int/docu/update/2006/12-december/e1214b.htm.
[681] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[682] Personal interview with Nikoloz Samkharadze- Parliament of Georgia in Tbilisi, Georgia on 10 June 2019. See Interview_ID_26_Nikoloz_Samkharadze_&_Giorgi_Khelashvili at https://reshare.ukdataservice.ac.uk/854598/

> they did not like, but we learned that in different parts of South Ossetia, including also Abkhazia, they started issuing Russian passports.[683]

He suggests Russian extraterritorial naturalisation [passportization] is a foreign policy instrument to control or manipulate to achieve geopolitical goals.

> Russia had a new doctrine or foreign policy in which they say that Russia has power to defend to anybody which considers themselves a Russian citizen, any place, globally. I think this was one of their elements, Russia's passportization, ... is one of their tools. ... Passportization is one of the elements of the power projection since the dissolution of the Soviet Union. ... Russia wants to control. ... passportization was the element of Russia's offensive to increase influence in this part of the world because the Caucasus is a gateway and Georgia is a small but very important gateway in this bigger gateway. ... It is about territories, not about the Abkhazians or Ossetians, they do not care about them, they do not care much about Georgia, but they care about the territories, about security, projection of their power, and access to power from different parts of the world.[684]

He argues that the Russian passportization is a combination of both hard and soft power mechanisms:

> It is not only about conflict between Georgia and Russia or Abkhazia and Ossetia, there are bigger strategic elements to this. We summarise it being about the projection of Russian security power, hard power, and maybe promotion of their soft power. ... This passportization is technical. You issue a passport to whoever, to an Ossetian to an Abkhazian, but passportization for Russians is much wider, much deeper, how to dominate and to humiliate the other side.[685]

The Georgian Foreign Minister at the time of the beginning of Russian extraterritorial naturalisation policies in South Ossetia and Abkhazia, Irakli Menagarishvili, explains how Russian actions shaped Georgian foreign policy:

> They [Russia] use this territory under de facto occupation and keep it under control has proven to be effective, so they have tightened. Logically they should not be interested in formalising this annexation. They will use the effectiveness of these tools, now they are using this to push Georgia, or hoping that Georgian foreign policy or behaviour will be somehow managed or directed. ... It seems like they will try to use all these tools for as

[683] Interview with Ambassador Tedo Japardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/
[684] Ibid.
[685] Ibid.

> long as possible, but everything depends on how the West is reacting, how the world is reacting.[686]

He suggests it is a mistake to focus on the territory as a resource in Russian motivation, by stating 'it is clear that they do not need these pieces of land as a territory, they are occupied just to create some leverage over Georgia.'[687] These territories have greater worth beyond the resources that can be extracted from the land. He somewhat controversially asserts that Georgia should be willing to cede the territories of Abkhazia and South Ossetia to Russia if it allowed Georgia to become a NATO member: 'I personally said that if NATO membership requires Georgia to be free of territorial claims with their neighbours, let us put those problems aside and join NATO and then start working on these territorial solutions.'[688]

Not everyone is convinced by the argument that Russian extraterritorial naturalisations in Georgia were conducted to create a barrier to Georgia's strengthening relationship with NATO and the EU, as Tengiz Pkhaladze stated in an interview:

> In 1994 the Russians are already involved in both conflicts in Abkhazia and Tskhinvali. Yeltsin came to Georgia. It was the only state visit of Russia presidents to Georgia. In 1994, we signed a package of documents about Russian military bases in Georgia and about economic cooperation. Georgia agreed to become a member of CIS. Georgia also agreed to become a member of the CSTO (Collective Security Treaty Organization), and we agreed to Russia's military base. Neither of those documents helped us to make even the minor progress towards the occupied territories, so that is why talking about the territory or NATO is not the right comparison. Once again, the conflict started earlier than when we made our official statements that we wanted to join [the] European Union and NATO.[689]

Nevertheless, he concedes that Russia conducted these practices to exert control and re-establish their sphere of influence following the collapse of the Soviet Union.[690] Through the extraterritorial naturalisations in Georgia, Russia has achieved power and control through the

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[686] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[687] Ibid.
[688] Ibid.
[689] Personal Interview with Tengiz Pkhaladze - Advisor to the President of Georgia and the Secretary for Foreign Affairs in Tbilisi, Georgia on 11 June 2019. See Interview_ID_27_Tengiz_Pkhaladze at https://reshare.ukdataservice.ac.uk/854598/
[690] Ibid.

destabilisation of their contiguous neighbour. 'They [Russia] need those territories [Abkhazia and South Ossetia] to balance Georgia's Western integration.'[691] Former Georgian Minister of Foreign Affairs, Tedo Japardize disputes the notion that Russia had humanitarian concerns when conducting extraterritorial naturalisations, highlighting the practice's strategic and political implications.

> Russia is strong militarily, security wise, but humanitarian and economic capacity wise it is so weak, and I doubt that they can practically help Ossetians and Abkhazians. They use passportization, in a very clear-cut way, politically. They use this to undermine us. ... It is a technical, legal, and there is no obligation, any time they feel it appropriate, they can say, 'ah we need to defend our citizens'. ... It is about neighbourhood, they are not talking about Russian citizens in the UK, or the United States of America, or Europe. ... there are some people in Moscow which look at Georgia, Abkhazia, Ossetia as a piece of territory to project their power. That is how Russians look this region. It is also about mental maps. ... Passportization is an instrument to project their own power, to control and dominate. ... It started as a kind of technical element, issuing passports, ... in the beginning, it was done to deliver as many Russian passports as possible, and keeping Georgia closer to Russia. Later, it is about power. They can use this passport anytime for different reasons, humanitarian, military, security, cultural, trade, economic, so they think in that way, but on the other hand, if you talk to Ossetians and Abkhazians, I doubt that Russia has accomplished this. Abkhazians are using these Russian passports to travel to Moscow to do some business there … but I would not say they love Russians more with these Russian passports, that is not the case.[692]

Ukraine

Russian Federation's extraterritorial naturalisation practices in Ukraine are likely motivated by attempts to halt the development and consolidation of Ukrainian relations with the EU and NATO. These relations had been strengthening under former Ukrainian presidents, Leonid Danylovych Kuchma and then Viktor Andriyovych Yushchenko, and was beginning to consolidate following the signing of the 2002 NATO–Ukraine Action Plan.[693]

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[691] Personal interview with Nikoloz Samkharadze- Parliament of Georgia in Tbilisi, Georgia on 10 June 2019. See Interview_ID_26_Nikoloz_Samkharadze_&_Giorgi_Khelashvili at https://reshare.ukdataservice.ac.uk/854598/

[692] Interview with Ambassador Tedo Japardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/

[693] NATO HQ, "NATO-Ukraine Action Plan," (2002).

Marko Mihkelson alludes to the soft power capabilities and information warfare of the Russian Federation, by stating 'they [Russia] have been very successful today, to disseminate this idea that NATO's enlargement and expansion to the east were evil, that NATO broke a promise to expand.'[694] For the Ukrainian authorities, Russia is a persistent threat.

> Russia really is a threat. ... It is basically proven by history. They started to spread their passports in Ukraine prior to the occupation. They achieved their goal over there, and right now, they do the same with Donbas, and there is no doubt where it would lead us to.[695]

Russia's military intervention via state-sponsored rebel forces and the extraterritorial naturalisations of some of the population in Donbas was followed by an offer from the Russian state to act as a mediator in the Minsk Protocol to resolve the conflict.[696] This offer, which Ukraine rejected, would have changed the type of conflict from an international dispute, subjected to international law, to a Ukrainian domestic dispute, and likely would have kept the conflict in a perpetual stalemate preventing Ukraine from ever joining the EU or NATO. The Foreign Policy Advisor to Ukrainian President Volodymyr Zelensky, Bohdan Yaremenko, explains how Ukraine infers Russian intent with regards to Donbas:

> I believe the most preferable scenario for them [Russia] would be to exchange the reintegration of Donbas into Ukraine, for Ukrainian recognition of Crimea. To legally annex Donbas would cost them a lot, so it would be more beneficial for them to get rid of this problem. Russia has very talented diplomats, and they will try to do it to the cost of Ukraine. They will try to make Ukraine pay as much as possible, meaning we must change the constitution to get our own territory back. The change of the constitution and laws would not just cover the issues of occupied territories themselves, but also, most likely, more authority to the regional powers, particularly those Russia has control over. Not to the local communities, but to the regional authorities, to create a federalisation. Of course, the issue behind it is to prevent Ukraine to be closer to NATO. It is clearly to control Ukraine geopolitically and where Ukraine moves or belongs politically.[697]

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[694] Personal interview with Marko Mihkelson, Estonian Foreign Affairs Committee in Tallinn, Estonia on 30 April 2019. See Interview_ID_01_Marko_Mihkelson at https://reshare.ukdataservice.ac.uk/854598/
[695] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine in Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/
[696] Personal Interview with Georgiy Tuka - Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons in Kyiv, Ukraine on 6 June 2019. See Interview_ID_17_Georgiy_Tuka at https://reshare.ukdataservice.ac.uk/854598/
[697] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine in Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/

He suggests that control over Crimea and Donbas are the beginning of Putin's plan and not the end:

> His intention was to control the country but is not the final objective. He wants full control over Ukraine ... to do it by political means including by stopping Ukrainian efforts to join NATO and the EU, by creating conflicts in Donbas. ... Russia has basically managed to use the conflicts as the instrument of geopolitical influence. ... They are fighting for their influence. ... They do not have any soft power.[698]

The Ukrainian Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons, Georgiy Tuka, suggests that Russian extraterritorial naturalisations in Donbas are 'a powerful tool for influence and pressure.'[699] He explains Russia's motivation with regards to the practice and suggests that Russia has been able to achieve hard power objectives, using a seemingly soft power instrument:

> The strategic goal for Putin is not Crimea or Donbas, it is the whole of Ukraine. You do not have to start a full-scale war for this. Soft power instruments are used quite actively. For example, in Ukraine, it is quite active. Putin's close relative, Medvedev, says that Kyiv that has to have direct conversations with Donetsk and Luhansk. The same situation was in Transnistria when Russia pressured Moldova to have direct conversation with Tiraspol, and the next day, Russia said 'this conflict is nothing to do with us, it is an internal, domestic issue, we are just peaceful observers there so what kind of sanctions can be towards us?' From one side, Putin wants the same scenario in Transnistria for Ukraine, and that is why they are pushing for this Minsk process, and on the other scenario is to give back Donbas and Luhansk to Ukraine, on the rights of so-called, full autonomy or enlarged autonomy. If the LPR and the DPR have a veto right on any economic or political decision of Ukraine, regarding any foreign policy decision, it means no EU and no NATO. They do not have to make war for this.[700]

Marko Mihkelson argues that the Russian Federation's strategy has been effective in achieving their foreign policy objectives, despite the circular logic within their rhetoric:

> This [Russia's claim to rightful intervention to protect its citizens] is one of the main strategic points. If they say and talk about right to use military force, they copy somehow the Americans and the Western countries, but they do it in [a] typical Russian way. Do the government really help their Compatriots? First, they create a problem and then they help, like they did in Georgia ... in South Ossetia and Abkhazia. Of course,

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[698] Ibid.
[699] Personal Interview with Georgiy Tuka - Deputy Minister for Temporary Occupied Territories and Internally Displaced Persons in Kyiv, Ukraine on 6 June 2019. See Interview_ID_17_Georgiy_Tuka at https://reshare.ukdataservice.ac.uk/854598/
[700] Ibid.

> Russia used all their tools to create a situation there, that was nearly unmanageable by Tbilisi. Then they started passportization, forcefully, involuntarily gave out passports, and then they declared these citizens are in danger and then provoked Georgia to go into war ... the main line, for the international public was that they are defending their own citizens. The very same happened in Crimea. ... And also, ... in Eastern Ukraine, they launched a military operation, like they did in Crimea, but massively used the same language, protecting people who were afraid to become victims to fascists who came to power in Kyiv. They tried the same in Estonia in the early 90s, very heavily, the same methods.[701]

Moldova

In Moldova, Russia's involvement in Transnistria will prevent any future aspirations of Europe's most impoverished state to strengthen its relationship with the EU. As with Georgia, Moldova had been attempting to strengthen its relations with NATO; in 1994, Moldova joined NATO's Partnership for Peace.[702] In 2010, Moldovan-NATO relations were further strengthened when the state signed an Individual Partnership Action Plan in 2010, renewed in 2017.[703] These documents refer to a desire to increase efforts to align with both the EU and NATO to protect the territorial integrity of Moldova; they explicitly refer to Transnistria and the Russian involvement in the breakaway state as a barrier to alignment efforts.[704] However, it is essential to note that there is an automatic limit to Moldovan alignment with NATO, given that there is a declared condition of permanent and unarmed neutrality within the Moldovan constitution.[705]

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[701] Personal interview with Marko Mihkelson, Estonian Foreign Affairs Committee in Tallinn, Estonia on 30 April 2019. See Interview_ID_01_Marko_Mihkelson at https://reshare.ukdataservice.ac.uk/854598/
[702] NATO HQ, "Partnership for Peace Programme," https://www.nato.int/cps/en/natohq/topics_50349.htm.
[703] Cristi Vlas, "Moldova Government Approves Individual Partnership Action Plan with NATO for 2017-2019," Moldova.org, https://www.moldova.org/en/moldova-government-approves-individual-partnership-action-plan-nato-2017-2019/.
[704] Republic of Moldova Constitutional Court "Judgment of the Interpretation of Article 11 of the Constitution (Permanent Neutrality)," (2017).
[705] Svetlana Cebotari, "The Republic of Moldova between Neutrality and NATO Memebership Status," *Postmodern Openings* 1, no. 3 (2010).

The logic of freezing conflicts

The Russian Federation's interventions in Georgia, Ukraine, and Moldova in the form of extraterritorial naturalisation have prevented these states from forming a closer relationship with the Western institutions of EU and NATO. Extraterritorial naturalisations have therefore been utilised as a technical tool that creates a situation within these states that prevents them from joining, or forming a closer alliance with, the EU or NATO by using the membership regulations of these institutions. The logic of this can be seen below in Figure 10, which provides a diagram explaining the process flow and in Figure 11, which provides this logic in a decision-tree format from the perspective of the naturalising state.

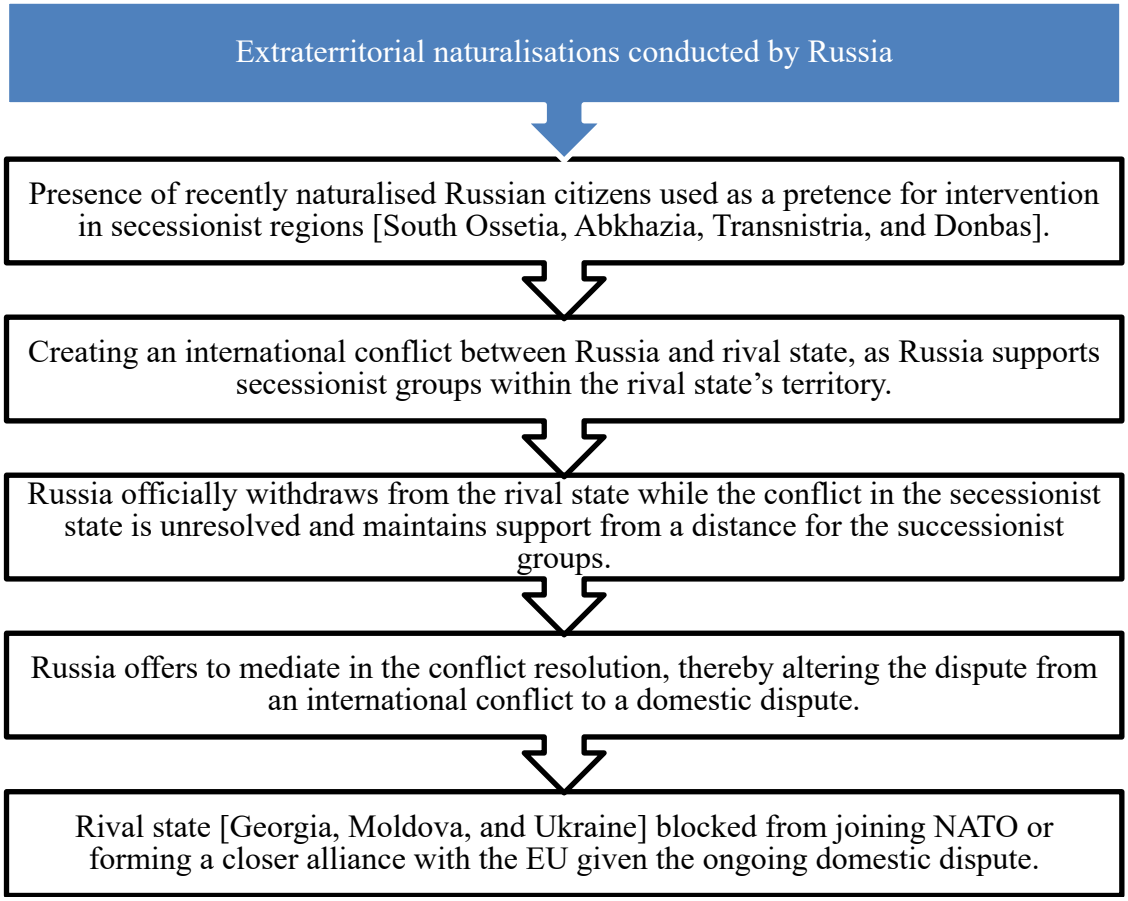


Figure 10. Freezing conflicts through extraterritorial naturalisations

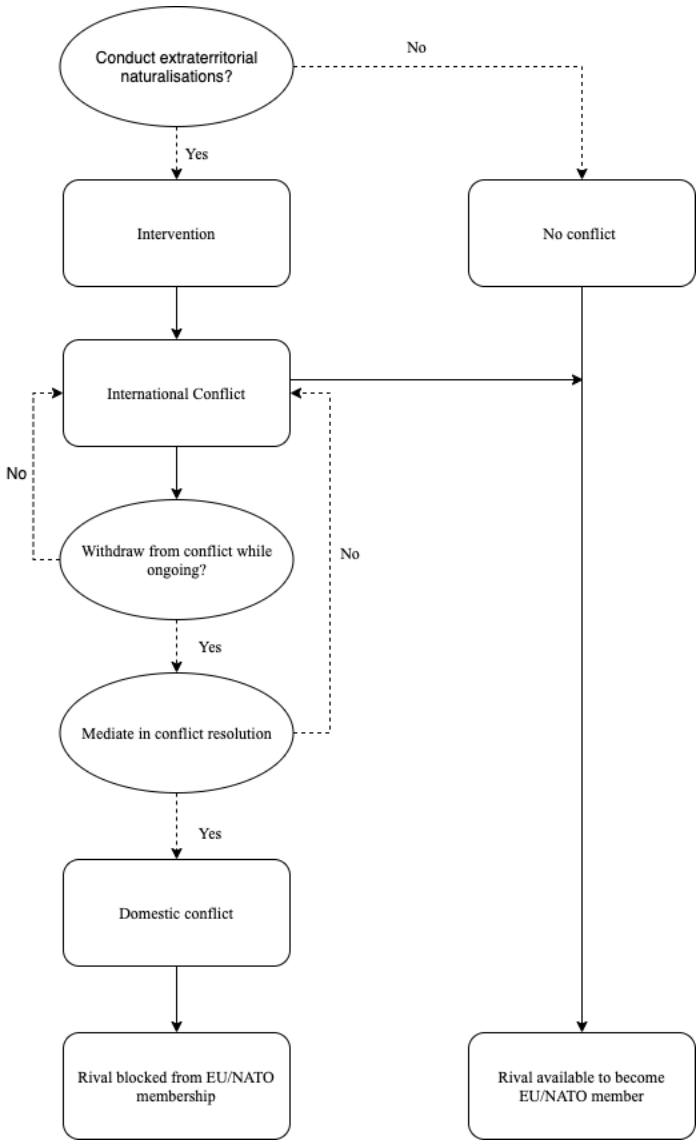


Figure 11. Decision tree logic of freezing conflicts through extraterritorial naturalisations

Support for the 'fifth column'

In the Baltic States, the extraterritorial naturalisations have been conducted to destabilise the established EU and NATO member states by instilling fear of military escalation and facilitating Russia's clandestine support for the 'fifth column' in these states. Many interviewed for this thesis suggested Russia is engaged in information warfare with the Baltic

states of Estonia and Latvia,[706] highlighted recently by reports suggesting that the Russian Federation investigated whether the Baltic states' independence achieved in the 1990s, was illegitimate.[707]

An Estonian politician, Dr Kristina Kallas, explains why Russia's intervention in Estonia differs from that in Georgia, Ukraine or Moldova:

> Russia is capable of destabilising the political situation internally [in Estonia], but it is not capable of military intervention .... We have a strongly protected border. We are a NATO member, so there is a huge load of geopolitical circumstances.[708]

This sentiment is echoed by the Estonian Foreign Affairs Committee, who consider Russia to be a threat, but without fear of Russian capabilities relative to their own given their membership with NATO and the EU:

> From day one, August 1991, when we regained our independence, we almost never had common lines with them because they never helped in real terms, the Russians living in Estonia. Only helping their own interests. Of course, they can try to organise something ... you can imagine you can just infiltrate or organise a terrorist attack somewhere and then can declare our Compatriots or citizens are in peril, and we have to move, we have to go and send peacekeeping force. ... But I argue that it is not so easy to do today than it was perhaps in the 90s against us.[709]

Marko Mickelson explains why Estonia's relationship with Russia is so poor, 'our bilateral relations were strained because of our will to join the EU and specifically NATO',[710] explaining how Russia attempts to destabilise Estonia:

> They [Russia] organised all kinds of informational operations against Estonia. If you compare the situation today with twenty years ago. It is quiet, we cannot see these kinds of day-to-day attacks, but they are more sophisticated. They work for so-called useful idiots. They do not even interfere but applaud what is happening in open societies, and

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[706] Personal interview with Marko Mihkelson, Estonian Foreign Affairs Committee in Tallinn, Estonia on 30 April 2019. See Interview_ID_01_Marko_Mihkelson at https://reshare.ukdataservice.ac.uk/854598/; Personal interview with the Latvian Ministry of Foreign Affairs in Riga, Latvia on 26 April 2019. See Interview_ID_05_Latvian_MFA at https://reshare.ukdataservice.ac.uk/854598/; Personal interview with Vytis Jurkois - Head of Freedom House Vilnius in Vilnius, Lithuania on 16 May 2019. See Interview_ID_12_Vytis_Jurkois at https://reshare.ukdataservice.ac.uk/854598/
[707] Tasch, "Russia Is Reviewing the 'Legality' of Baltic States' Independence".
[708] Personal interview with Kristina Kallas – a politician of the Estonian political party, Eesti 200, in Tallinn, Estonia on 4 May 2019. See Interview_ID_04_Kristina_Kallis at https://reshare.ukdataservice.ac.uk/854598/
[709] Personal interview with Marko Mihkelson, Estonian Foreign Affairs Committee in Tallinn, Estonia on 30 April 2019. See Interview_ID_01_Marko_Mihkelson at https://reshare.ukdataservice.ac.uk/854598/
[710] Ibid.

> the polarisation in many of our societies today. They use ... useful idiots. They know the sort of influence they can exert.[711]

From the perspective of the Latvian Ministry of Foreign Affairs, they believe the Russian Federation uses 'their' Compatriots to destabilise Latvia and create pressure from within:

> It is absolutely clear that it [Russia's Compatriot Policy] is part of a long-term foreign policy goal and is a permanent feature of their foreign policy towards Latvia. The aim or mission to protect their populations has resulted in a situation where there is now constant and persistent strife between Latvia and Russia. They do this to create a platform where they can show their power against us. It is so extensive that within the citizenship department of the Ministry of Foreign Affairs that 90% of our work is done against Russia. The 'Compatriot Policy' is a tool to wield power, and for Russia, it is a very important tool to create a constant threat and is a strain on the relations between the two countries; this is their aim. Our work is basically to progressively defend ourselves through international fora. The pressure and work are primarily done through international monitoring mechanisms, and even through these mechanisms, Russia is able to apply pressure, and they maintain a strong presence through these institutions; this results in more work, but it is not a problem as we are transparent with our legislation and objectives. We receive thousands of letters from the so-called human rights activists, who are really Russian language speakers trying to further their agenda. The OSCE national minority rights commission makes frequent visits. ... We very clearly follow the recommendations from the Bolzano report, that states that there are no overlapping jurisdictions, where national minorities are concerned.[712]

As with their Estonian counterparts, the Latvian authorities believe that the Russian Federation is directing some disruptive forces:

> the Russian Federation finances some human rights NGOs who have a close working relationship with the Kremlin. ... The Human Rights Committee is a confusing title, as they do not work in human rights, but they are funded by Russia. ... many of the activities done by the Russian Federation with regards to the Russian people in Latvia is not done in good faith. Passportization in Donbas, Crimea, Georgia and Moldova are not done in good faith. It is a very important tool for the Russian Federation.[713]

From the perspective of the Russian Compatriots living in the Baltic States, the perspective of Russia is different to that from those in state offices. Aleksandr Kuzmin, a researcher and advisor to the Latvian Russian Union, an ethnic political party representing Russians in

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[711] Ibid.
[712] Personal email correspondence with Karlis Pantelejevs – Latvian ministry of Foreign Affairs on 7 May 2019. See Interview_ID_07_Karlis_Pantelejevs at https://reshare.ukdataservice.ac.uk/854598/
[713] Ibid.

Latvia, as well as an advisor to Latvian Member of the European Parliament (MEP) Tatjana Ždanoka, argued,

> I think they [the Russian Federation] are trying to show the West, show NATO, show Latvia that there are clear hypocrisies in western democratic countries with regards to human rights abuses. The West attack Russia for being anti-democratic and for their supposed human rights violations, yet they are fine with the abuses taking place within the European Union; this is why they [the Russian Federation] are keen to support the Russian population here in Latvia.[714]

Somewhat controversially, the Russian Federation help finance Russian ethnic political parties in the Baltic states, some of which, like the Russian Union, have MEPs within the European Parliament.

Demographic considerations

Many interviewed for this thesis highlight Russia's demographic issues as a reason for conducting extraterritorial naturalisations, thereby increasing Russia's population. 'Russia, quite absolutely correctly said, have their own demographic problems, their own humanitarian problems to take care of their own citizens.'[715] The Russian statistics agency Rosstat showed that 2019 marked the third consecutive year of demographic decline; the predicted decline for 2019 was 300,000 people, a significant increase in negative natural change from 19,000 people in 2017, and 100,000 in 2018[716] this is not a new phenomenon for the Russian Federation, as the population in Russia has been in consistent decline since the 1990s. These demographic changes are shown in the statistics provided in Table 3 below.

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[714] Personal interview with Aleksandr Kuzmin – Advisor to Latvian Russian Union and Latvian MEP in Riga, Latvia on 8 May 2019. See Interview_ID_09_Aleksandr_Kuzmin at https://reshare.ukdataservice.ac.uk/854598/
[715] Interview with Ambassador Tedo Japardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/
[716] Federal Service of State Statistics of the Russian Federation, "Socio-Economic Position of Russia June - October 2019," (Moscow: Russian Federation - Rossat, 2019).

Table 3. Demographic statistics of the Russian Federation[717]

	Total Average Population	Live Births	Deaths	Natural Change	Crude birth rate (per 1,000)	Crude death rate (per 1,000)	Natural change (per 1,000)	Total Fertility Rates
1989	147,342,000	2,160,559	1,583,743	576,816	14.7	10.7	3.9	2.01
1990	147,969,000	1,988,858	1,655,993	332,865	13.4	11.2	2.3	1.892
1991	148,394,000	1,794,626	1,690,657	103,969	12.1	11.4	0.7	1.732
1992	148,538,000	1,587,644	1,807,441	–219,797	10.7	12.2	–1.5	1.547
1993	148,459,000	1,378,983	2,129,339	–750,356	9.3	14.3	–5.1	1.369
1994	148,408,000	1,408,159	2,301,366	–893,207	9.5	15.5	–6.0	1.394
1995	148,376,000	1,363,806	2,203,811	–840,005	9.2	14.9	–5.7	1.337
1996	148,160,000	1,304,638	2,082,249	–777,611	8.8	14.1	–5.2	1.27
1997	147,915,000	1,259,943	2,015,779	–755,836	8.5	13.6	–5.1	1.218
1998	147,671,000	1,283,292	1,988,744	–705,452	8.7	13.5	–4.8	1.232
1999	147,215,000	1,214,689	2,144,316	–929,627	8.3	14.6	–6.3	1.157
2000	146,597,000	1,266,800	2,225,332	–958,532	8.6	15.2	–6.5	1.195
2001	145,976,000	1,311,604	2,254,856	–943,252	9	15.4	–6.5	1.223
2002	145,306,496	1,396,967	2,332,272	–935,305	9.6	16.1	–6.4	1.286
2003	144,648,624	1,477,301	2,365,826	–888,525	10.2	16.4	–6.1	1.319
2004	144,067,312	1,502,477	2,295,402	–792,925	10.4	15.9	–5.5	1.344
2005	143,518,816	1,457,376	2,303,935	–846,559	10.2	16.1	–5.9	1.294
2006	143,049,632	1,479,637	2,166,703	–687,066	10.3	15.1	–4.8	1.305
2007	142,805,120	1,610,122	2,080,445	–470,323	11.3	14.6	–3.3	1.416
2008	142,742,368	1,713,947	2,075,954	–362,007	12	14.5	–2.6	1.502
2009	142,785,344	1,761,687	2,010,543	–248,856	12.3	14.1	–1.8	1.542
2010	142,849,472	1,788,948	2,028,516	–239,568	12.5	14.2	–1.7	1.567
2011	142,960,908	1,796,629	1,925,720	–129,091	12.6	13.5	–0.9	1.582
2012	143,201,700	1,902,084	1,906,335	–4,251	13.3	13.3	–0.0	1.691
2013	143,506,995	1,895,822	1,871,809	24,013	13.3	13	0.2	1.707
2014	146,090,613	1,942,683	1,912,347	30,346	13.3	13.1	0.2	1.75
2015	146,405,999	1,940,579	1,908,541	32,038	13.3	13.1	0.2	1.777
2016	146,674,541	1,888,729	1,891,015	–2,286	12.9	12.9	–0.0	1.762
2017	146,842,402	1,690,307	1,826,125	–135,818	11.5	12.4	–0.9	1.621
2018	146,830,576	1,604,344	1,828,910	–224,566	10.9	12.5	–1.6	1.579
2019	146,748,590	1,481,074	1,798,307	–317,233	10.1	12.3	–2.2	1.5

A declining population can be problematic for a government as it creates economic consequences which effectively inhibit macroeconomic growth, as the state can draw upon fewer tax revenues, and domestic markets have fewer consumers. Moreover, a declining population usually indicates a low fertility rate, resulting in an ageing population. For the Russian Federation, demographic decline is a serious issue, as it means its economy falters,

[717] Russian Federation Bureau of Statistics (Rosstat), "Population - Demography," https://rosstat.gov.ru/folder/12781.

making it significantly harder to generate, maintain, and improve state capacity. However, demographics are only part of the story, and the Russian Federation has been able to make up some of the losses to 'natural changes' in the demographics through a net increase in migration, shown in Table 4 below.

Table 4. Migration statistics of the Russian Federation[718]

	Emigrants	Immigrants	Net Migration
1991	675497	692238	16741
1992	673143	926020	252877
1993	483028	923280	440252
1994	337121	1146735	809614
1995	339600	842050	502450
1996	288048	631592	343544
1997	232987	597651	364664
1998	213377	513551	300174
1999	214963	379726	164763
2000	145720	359330	213610
2001	121166	193450	72284
2002	106685	184612	77927
2003	94018	129144	35126
2004	79795	119157	39362
2005	69798	178981	109183
2006	54061	188308	134247
2007	47013	291675	244662
2008	39508	281614	242106
2009	32458	279907	247449
2010	33577	191656	158079
2011	36800	356500	319700
2012	122800	417700	294900
2013	186400	482200	295800
2014	308500	578500	270000
2015	353200	598600	245400
2016	313200	575200	262000
2017	377200	589000	211800

Between 1992 and 2017, over 9 million people received Russian citizenship through naturalisation, of which 6.7 million were conducted by bodies part of the Federal Migration

[718] Russian Federation Bureau of Statistics (Rosstat), "Population - Migration," https://rosstat.gov.ru/folder/12781.; UN DESA, "International Migration Flows to and from Selected Countries: The 2015 Revision," https://www.un.org/en/development/desa/population/migration/data/empirical2/migrationflows.asp.

Service part of the Ministry of Internal Affairs bodies and the Federal Migration Service, and another 2.2 million through the foreign institutions of the Russian Federation, all of which are shown in Table 5 below.

Table 5. Numbers of naturalised Russian Citizens[719]

	Foreign Missions of Russia Federatio	**Federal Migration Service**
1992	35209	17000
1993	113684	11700
1994	339262	180100
1995	230714	471200
1996	160974	326700
1997	131171	326200
1998	14927	353400
1999	93467	300700
2000	134474	332100
2001	132873	359200
2002	174117	272500
2003	14700	31500
2004	49100	330400
2005	52000	504500
2006	64200	366500
2007	72400	367700
2008	60800	361400
2009	61200	394100
2010	54300	111300
2011	37000	135000
2012	33500	95700
2013	38100	117400
2014	40600	157800
2015	44300	209800
2016	48900	265300
2017	49200	257800
Total	**2281172**	**6657000**

Therefore, Russia has been able to mitigate the demographic decline through a positive net migration rate,[720] but more importantly from the perspective of this thesis, through

[719] Source: Data from the Consular Department of the Russian Foreign Ministry. Found in Olga S Chudinovskikh, "Statistics on Citizenship Acquisition as a Reflection of the Peculiarities of the Russian Migration Policy," *Voprosy statistiki* 25, no. 9 (2018).
[720] See Table 4

naturalising individuals to become Russian citizens, both on Russian soil and through extraterritorial naturalisation policies. Part of the strategic intent of the extraterritorial naturalisation policies has been to address this demographic decline. 'Russia's demographic balance is negative ... this Compatriot Policy is not only a foreign policy tool, but it is a domestic policy tool.'[721] It is important to note, that Russian Compatriot Policy is only a solution to a demographic decline if the Russian Compatriots 'return' to Russia; in maintaining strong links with their Compatriots, the option remains open. It is, therefore, unclear whether this has been an effective arm of the strategy.

Displaying power for domestic support generation

Polling by the Russian quasi-independent social research institute Levada shows significant spikes in the Russian's public approval rating of presidents Vladimir Putin and Dmitry Medvedev during and following periods of aggressive Russian foreign policy.[722] Figure 12, Figure 13, Figure 14, and Figure 15 provide this polling data graphically, annotated with the relevant key events, and is included to help illustrate changes in public perceptions. Following Russia's military intervention in Georgia in 2008, and then again in Crimea in 2014, the approval ratings and conversely disapproval ratings moved during these periods. According to these polls, the government's public approval also increased during these periods,[723] as do polls indicating approval in the assessment of the situation in the country.[724] As with any

[721] Personal interview with Nikoloz Samkharadze- Parliament of Georgia in Tbilisi, Georgia on 10 June 2019. See Interview_ID_26_Nikoloz_Samkharadze_&_Giorgi_Khelashvili at https://reshare.ukdataservice.ac.uk/854598/
[722] See Figure 12 and Figure 13
[723] See Figure 14
[724] See Figure 15

polling data, these statistics should be used cautiously, but this data does reflect a consensus that the Russian public approve of Russia's intervention in foreign territories.[725]

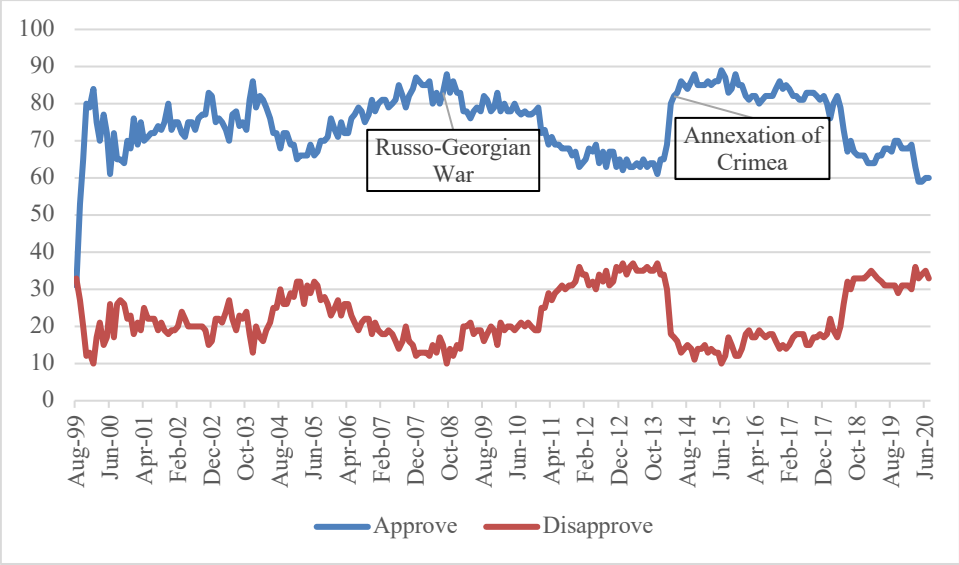


Figure 12. Russian domestic approval ratings of Vladimir Putin[726]

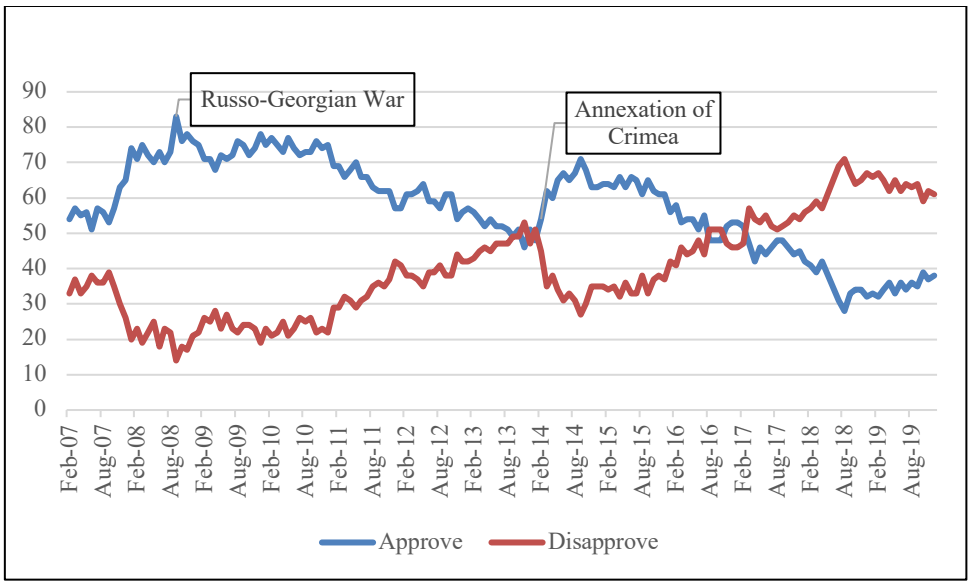


Figure 13. Russian domestic approval ratings of Dmitry Medvedev[727]

[725] Maria Engström, "Contemporary Russian Messianism and New Russian Foreign Policy," *Contemporary Security Policy* 35, no. 3 (2014).
[726] Levada - Center, "Ratings," https://www.levada.ru/en/ratings/. Table available online at: https://www.levada.ru/en/ratings/
[727] Ibid.

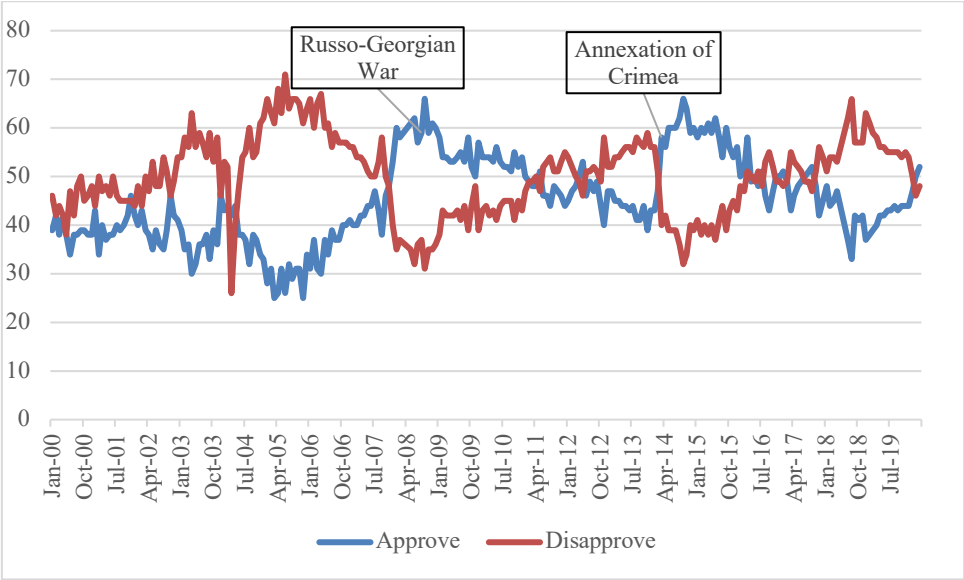


Figure 14. Russian domestic approval ratings of the Russian government[728]

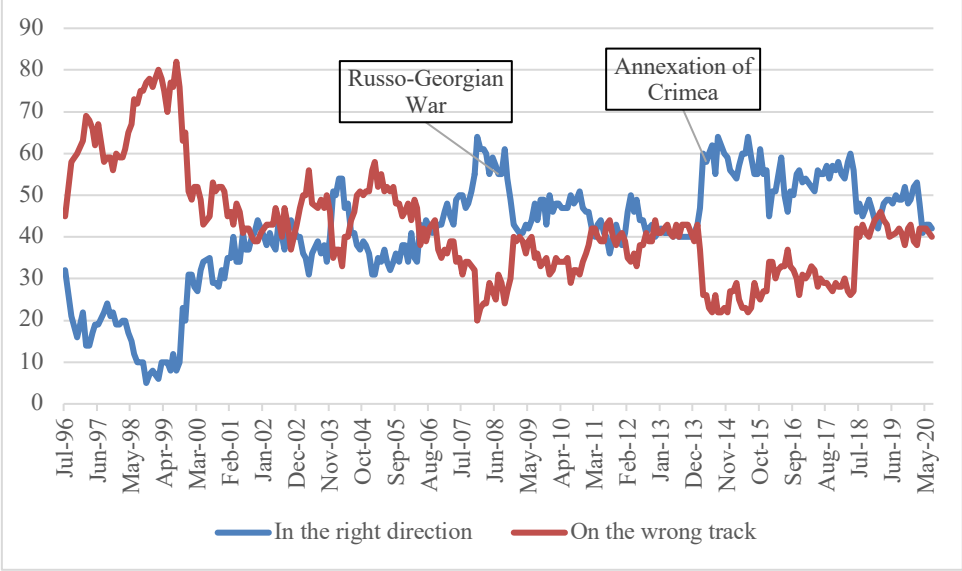


Figure 15. Russian domestic assessment of the situation of the country[729]

Some of those interviewed for this thesis suggested that Putin needs to be aggressive in order to maintain domestic support. 'Putin needs kind of need an idol to show the population look we should stay united. ... you need some foreign enemy as an idol to show them that we have to stay strong and united.'[730] Others have suggested that Russia's foreign policy goals should

[728] Ibid.
[729] Ibid.
[730] Personal Interview with Tengiz Pkhaladze - Advisor to the President of Georgia and the Secretary for Foreign Affairs in Tbilisi, Georgia on 11 June 2019. See Interview_ID_27_Tengiz_Pkhaladze at https://reshare.ukdataservice.ac.uk/854598/ Also see Elias Götz and Camille-Renaud Merlen, "Russia and the Question of World Order," *European Politics and Society* 20, no. 2 (2019).

be perceived within a frame of a larger ideological battle for power with Russia's great rival, the US. 'His first goal is to show some harm to the Americans, in order to show Russian people that he is very strong, and he is fighting Goliath.'[731] By positioning Russia in this manner, Putin can continue his objectives both domestically and internationally.

> He [Vladimir Putin] is smart enough to understand that he has no chance to confront these huge Western states in a fight in a real battle. But he has to have strong support domestically to continue those nasty things that he and his friends are doing—stealing billions and billions of dollars. He is not prepared to give it up.[732]

With regards to electoral support from extraterritorial naturalisations, although there is evidence of widespread electoral fraud in Russian presidential elections, reports suggest that the naturalised citizens of these regions have participated on a large scale in Russian State Duma elections;[733] meaning that domestic support for the incumbent government through extraterritorial naturalisation is both in-direct and direct.

Collecting political bargaining chips

The Russian Federation has used extraterritorial naturalisations both strategically, and opportunistically. Vytis Jurkois, head of Freedom House Vilnius argues that 'the Kremlin is very situational and very flexible. They are working on a couple of scenarios at the same time, so they can evaluate and pounce.'[734] He suggests Russia's political structure allows for this, 'one of the Kremlin's advantages that they have, is unaccounted money. They have wasted

[731] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/; Also see Michael McFaul, *From Cold War to Hot Peace: The inside Story of Russia and America* (Penguin UK, 2018).
[732] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[733] Tagliavini, "Independent International Fact-Finding Mission on the Conflict in Georgia."
[734] Personal interview with Vytis Jurkois - Head of Freedom House Vilnius in Vilnius, Lithuania on 16 May 2019. See Interview_ID_12_Vytis_Jurkois at https://reshare.ukdataservice.ac.uk/854598/

money, whereas we [Lithuania and the 'West'] have to count every single penny.'[735]

Interviewees have argued that 'Russia uses your weaknesses'[736] and that,

> The Russians are always preparing for the different scenarios. They are not stupid. They are smart. They are sometimes crazy in their political decisions. But in the process of the implementation of their strategy and political order, they are not stupid. So they are preparing for the different scenarios, for instance, if tomorrow needs an annexation.[737]

The same argument has been applied to Russian extraterritorial naturalisation practices in the Baltic States: '[Why has Russia conducted passportization in the Baltics?] Just in case, if the situation allows, let's have [an] amount of people that he can refer to.'[738] Some have argued that the Baltic State's inactivity in granting citizenship to the grey passport holders has created an opportunity for Russia, which they have utilised. 'By not giving them citizenship, we actually push ourselves, those kids to be in the hands of Russia.'[739] The Mayor of Daugavpils, Latvia, suggests that the Russian Federation is quick to react to any perceived openings in their neighbours' domestic policy. 'Some of our neighbours are taking advantage of it. They are being opportunistic, absolutely, and it is helping them [the Russian Federation], not us.'[740]

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[735] Ibid.
[736] Interview with Ambassador Tedo Japardize – Former Minister of Foreign Affairs and Georgian Ambassador to the US in Tbilisi, Georgia on 4 June 2019. See Interview_ID_24_Tedo_Japardize at https://reshare.ukdataservice.ac.uk/854598/
[737] Personal Interview with Tengiz Pkhaladze - Advisor to the President of Georgia and the Secretary for Foreign Affairs in Tbilisi, Georgia on 11 June 2019. See Interview_ID_27_Tengiz_Pkhaladze at https://reshare.ukdataservice.ac.uk/854598/
[738] Personal interview with Mr Irakli Menagarishvili - Former Georgian Minister of Foreign Affairs in Tbilisi, Georgia on 13 June 2019. See Interview_ID_28_Irakli_Menagarishvili at https://reshare.ukdataservice.ac.uk/854598/
[739] Personal interview with Kristina Kallas – a politician of the Estonian political party, Eesti 200, in Tallinn, Estonia on 4 May 2019. See Interview_ID_04_Kristina_Kallis at https://reshare.ukdataservice.ac.uk/854598/
[740] Personal interview with Andrejs Elksniņš - Mayor of Daugavpils in Daugavpils, Latvia on 8 May 2019. See Interview_ID_08_Andrejs_Elksniņš at https://reshare.ukdataservice.ac.uk/854598/

Irredentism

The Russian Federation's occupation and *de facto* control of some of the territories on which they conduct extraterritorial naturalisations might appear to be evidence of irredentist intent. Although it cannot be ruled out that the Russian Federation is attempting raw expansionism by taking control of secessionist regions in contiguous states it is unlikely that these interventions will result in territorial annexations, Crimea aside. Nevertheless, territory is fundamental to the Russian Federation,

> They [Russia] have lied about territories and history. ... I argue that we have to make it happen that Russia will one day accept that their borders are fixed, and not flexible; this is in their mentality, that territory is something that can be changed, in the interest of Mother Russia or Russian interests specifically, to the west and the south. ... This is something that we must understand; this is why they do not recognise the fall of the Berlin Wall. They cannot accept a democratic, unified Europe. They see it a different way. They see that Russia is a centre of power, that has to have an area of influence around themselves or globally. ... their main argument goes, that they have some sort of legitimate right over some kind of territories or over the truth of history. ... This is a very sensitive issue; this touches … at the heart of Russians because you can imagine seventy years of propaganda, how deep are these emotions. Family stories but behind this or next to this, there are also propaganda lines that we brought peace, stability and prosperity to those who do not accept it, those that attack us and want to dismantle Russian Federation or empire. ... We cannot accept the world view disposed of by Russia.[741]

For some, this territory is the entire former Soviet Union. 'They [Russia] have never lost the desire, the will, or interest in regaining control over the course of the entire former Soviet Union.'[742] Some interviewed for this thesis argued that further annexation of territories on which Russia has conducted extraterritorial naturalisations are unlikely but would not rule it out. 'They might annex these territories [Abkhazia and South Ossetia], but it would be a major punishment for what Georgia does. For example, if we are coming very close to

[741] Personal interview with Marko Mihkelson, Estonian Foreign Affairs Committee in Tallinn, Estonia on 30 April 2019. See Interview_ID_01_Marko_Mihkelson at https://reshare.ukdataservice.ac.uk/854598/
[742] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine in Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/

NATO.'[743] For the Russian Federation expanding influence, rather than territory, is driving their foreign policy goals:

> The ultimate goal is to restore the Soviet Union, but they are perfectly aware that it is not possible at this stage because first of all, they do not have the economic resources for that. So, therefore, with their limited resources, they are trying to at least keep their zone of influence in the former Soviet territories.[744]

Nevertheless, irredentism cannot be definitively ruled out as an intent, especially given Russia's annexation of Crimea in 2014.

Conclusion

This chapter has argued that the Russian Federation is likely to use extraterritorial naturalisations as a strategic foreign policy tool to achieve domestic and international objectives. Domestically the extraterritorial naturalisations have enabled Putin to strengthen his support within Russia, while also introducing a practice that addresses a demographic crisis within the country. Internationally, the extraterritorial naturalisations have stopped rivals from joining adversarial institutions of the EU and NATO by creating a pretence for intervention and freezing the conflicts in Georgia, Ukraine, and Moldova. The extraterritorial naturalisations have also enabled the Russian Federation to maintain and strengthen its 'fifth column' network in the Baltic States. The practice has also enabled Russia to collect political bargaining chips, that may not be utilised immediately, but could potentially be cashed in in the future. Moreover, the practice has been used in the annexation of Crimea, and therefore explicit irredentist motives cannot be overlooked. The following chapter will show how

[743] Personal interview with Giorgi Khelashvili - Parliament of Georgia in Tbilisi, Georgia on 10 June 2019. See Interview_ID_26_Nikoloz_Samkharadze_&_Giorgi_Khelashvili at https://reshare.ukdataservice.ac.uk/854598/
[744] Personal interview with Nikoloz Samkharadze- Parliament of Georgia in Tbilisi, Georgia on 10 June 2019. See Interview_ID_26_Nikoloz_Samkharadze_&_Giorgi_Khelashvili at https://reshare.ukdataservice.ac.uk/854598/

Hungary has used extraterritorial naturalisations as a means to achieve its goals at both an international and domestic level.

Chapter 7: The Strategic Intent and Impact of Hungarian Extraterritorial Naturalisations

The previous chapter presented evidence for the argument that Russian extraterritorial naturalisations were conducted strategically to obtain both domestic and foreign policy goals. This chapter will show how Hungarian extraterritorial naturalisations have created the strategic gains for the Hungarian state and incumbent government. Although there are some overlaps in strategic gains, there is variance between the two states and the 'home states' in which these practices are conducted. For Hungary and Fidesz the extraterritorial naturalisations have attempted to 1) facilitate ethnic political party alliance building in the 'home states', 2) reverse the demographic decline in Hungary, 3) make economic gains, and 4) increase potential (loyal) external voters resulting in instantaneous transnational electoral gains. This chapter will use empirical data collected through conducting interviews with political stakeholders in the 'home states' and the naturalising state.

Emotive ethnic particularism

From the Hungarian state's perspective, the government's extraterritorial naturalisations are no more than a benign attempt to reconnect with Hungarian nationals through a symbolic act of demonstrating national belonging. As put by one interview participant, 'Hungary made it easier for the community members on the one side of the border to be integrated into Hungarian society.'[745] In other words, ethnic particularism as an ideology surpasses any

[745] Personal Interview with Antilla Korodi - UDMR Member of Romanian Chamber of Deputies in Bucharest, Romania on 4 June 2019. See Interview_ID_23_Antilla_Korodi at https://reshare.ukdataservice.ac.uk/854598/

instrumental motivation. This argument that Hungary's extraterritorial naturalisations are solely a form of ethnic privileging is more convincing than the Russian version given that the majority of those who received Hungarian citizenship is indeed *Magyar.* However, this chapter will detail the points of contention in this argument. It will offer evidence that, while emotive particularism cannot be ruled out entirely, strategic and instrumental considerations appear to be factors motivating the practice, in the guise of emotional preservation of the Hungarian nation.

A recently naturalised Hungarian citizen, working for the political party, the Transcarpathian Hungarian Cultural Association (KMKSZ) in Ukraine explained the importance of the practice's symbolic element. 'It was the first time in my life that my first and last name were written without a mistake. I am Hungarian. It is symbolic. I have Hungarian citizenship. It also gives me a lot of opportunities.'[746] While others reference the role of fostering identity and belonging in the policy:

> With the citizenship, the Hungarians in Romania felt that Hungary has reached out to them; this was both a legal and an emotional relationship. ... over the past decade, Bucharest has seen this in a negative way, this new relationship with the Hungarians here. ... starting from 2004/2005 the Hungarians in Romania have started to follow media from Hungary, TV stations from Hungary. We need to also state that Hungarians in Romania are aware that matters concerning their everyday lives are decided upon in Bucharest, but as far as their ethnic identity, their cultural identity and matters relating to this, they know that Budapest and Hungary play a major role.[747]

For those Hungarian political stakeholders that further the ideological argument, as found in the official state rhetoric, territory is significant, precisely the territory that encompasses the former Kingdom of Hungary prior to the Treaty of Trianon. 'The official

[746] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/
[747] Personal interview with István Székely – Executive Vice President of RMDSZ in Cluj-Napoca on 27 May 2019. See Interview_ID_20_István_Székely at https://reshare.ukdataservice.ac.uk/854598/

ideology is that they should stay in their own land and they prosper.'[748] This specific territory is fundamental to government policy relating to the Hungarians abroad.

> The single most important strategic goal of this current government is to have Hungarian communities living in the territories in the Carpathian Basin. It is not much use to us to have a Hungarian diaspora in London, but in Slovakia, Romania, Serbia, Slovenia, Croatia and Ukraine, this is extremely important. The most important.[749]

The Hungarian political elite officially states that the policy is not to encourage movement. 'It is the intention that people should stay on the territory where you were born, and you should have the possibilities there to live a normal life.'[750] In Romania, for example, others have somewhat cynically suggested that the policy is conducted so that the Hungarian government can 'protect Transylvanian Hungarians from their invaders.'[751]

Those cynical of the government's intentions have referred to the relationship between Fidesz and the Hungarian communities living abroad as exploitation, 're-joining the nation across borders plays on sentiment as there is a favourable perception of re-unification ... Exploiting Hungarians for their own domestic political goal as the Hungarian government gives money for new children.'[752] Many interviewed for this thesis question Viktor Orbán's commitment to ideology. 'Orbán, previously a liberal, has a history of reversing ideological position.'[753] Others point to historical irregularities of Orbán's past actions,

> Viktor Orbán is inconsistent. He is a chameleon. He adjusts his policies to meet his needs. In the 1990s he walked out of a forum discussing the negative implications of the

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[748] Personal interview with István Székely researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[749] Personal interview with Mr Balázs Orbán, Director of Research Századvég School of Politics Foundation and advisor to Fidesz, in Budapest, Hungary on 25 May 2017. See Interview_ID_37_Balázs_Orbán at https://reshare.ukdataservice.ac.uk/854598/

[750] Personal interview with Ferenc Kalmár, Hungarian Minister for Foreign Affairs, in Budapest, Hungary on 16 May 2017. See Interview_ID_34_Ferenc_Kalmár at https://reshare.ukdataservice.ac.uk/854598/

[751] Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[752] Personal online video interview with Dr Janos Fiala on 3 May 2017. See Interview_ID_29_Janos_Fiala at https://reshare.ukdataservice.ac.uk/854598/

[753] L. Bayer, "Trading Places on the Hungarian Right," https://www.politico.eu/article/hugary-right-wing-trading-places-fidesz-jobbik/.

> Treaty of Trianon, and now he has a bumper sticker on his car displaying the area making up Greater Hungary.[754]

As will be demonstrated below, numerous points suggest that the Hungarian form of extraterritorial naturalisations have strategic elements, if they are not wholly instrumental. For example, Adam Szesztay, at the Hungarian Department head of Planning and Analysis suggested the Hungarian government take the issue of extraterritorial naturalisation exceptionally seriously, 'the whole issue is prioritised, and the Hungarians abroad are of strategic interest to the foreign policy department.'[755] Some others working closely with the government point at instrumental motives behind naturalising populations beyond Hungary's territorial borders:

> In 2010 we managed to achieve a political unification of the nation with voting rights and a definite cultural connection. ... Engaging with our community requires more than just folk dancing. It is not easy to focus on cultural issues when you are a minority. Therefore we need to create a hub or area where it is trendy to stay. It needs to make sense on three fronts: economically, it needs to be beneficial, as well as politically and culturally.[756]

In this argument, the desire for power is apparent: 'We want to increase the Hungarian influence in the region',[757] said an advisor to Viktor Orbán's Fidesz party, with a National Strategy Research Institute (NSKI) official suggesting, 'Hungary has an ability to network and gain influence in these territories because of the relationship with the Hungarians living there.'[758] Hungarian nationality and citizenship have been used as a means for gaining relative power over regional rivals:

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[754] Personal interview with an anonymous political journalist from Vojvodina in Subotica, Serbia on 30 May 2017. See Interview_ID_44_Subotica_Journalist at https://reshare.ukdataservice.ac.uk/854598/
[755] Personal interview with Mr Adam Szesztay, Hungarian Department head of Planning and Analysis, Budapest, Hungary on 16 May 2017. See Interview_ID_32_Adam_Szesztay-&_Marton-John_Bernadett_Valéria at https://reshare.ukdataservice.ac.uk/854598/
[756] Personal interview with Mr Balázs Orbán, Director of Research Századvég School of Politics Foundation and advisor to Fidesz, in Budapest, Hungary on 25 May 2017. See Interview_ID_37_Balázs_Orbán at https://reshare.ukdataservice.ac.uk/854598/
[757] Ibid.
[758] Personal interview with an anonymous NSKI official, in Budapest, Hungary on 15 May 2017. See Interview_ID_31_NSKI at https://reshare.ukdataservice.ac.uk/854598/

> Hungary has always ruled the Carpathian basin and are the most dominant culture there. We want to re-gain this power that we used to have to show that we are a strong country. For this we need Hungarians living in these states and Hungary should organise the lives of the people in our former Kingdom's territory, as has always been the case. Without the Hungarians, there is no legitimacy to have a say in this process.[759]

As made apparent in the previous chapters, the Hungarian government has frequently framed the extraterritorial naturalisation practices to re-join the Hungarian communities beyond the territorial borders. For others, however, this has been framed as a means to colonise these communities:

> Following the treaty of Trianon, the fragments that followed hindered real economic development. The problem with this fragmentation was that it was not logical but arbitrary, artificial border drawing that creates problems with the current politics. The Fidesz party have taken a nationalist approach to this, which has divided the Hungarians both in Hungary and within the regions where the Hungarians divide. .... Fidesz realised they could create political capital by adopting a divisive approach. They seek to demoralise, divide and conquer. We can see this at the moment as they are attempting, not to engage with the Hungarian communities, but colonise them. ... He [Viktor Orbán] does not wish to cooperate but dominate and colonise.[760]

Others argue that the naturalisations are conducted in order to generate power domestically:

> They [the Hungarian state] are satisfied with influence. ... Much of the engagement with the Hungarians abroad is purely down to corruption and to strengthen their position domestically in Hungary. They do not really care about the people.[761]

Alternatively, to generate money for those in power: 'They [Orbán and Fidesz] want [Hungary] to become a political and economic regional power; this is their ambition. Power. Power and money.'[762]

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[759]Personal interview with Mr Balázs Orbán, Director of Research Századvég School of Politics Foundation and advisor to Fidesz, in Budapest, Hungary on 25 May 2017. See Interview_ID_37_Balázs_Orbán at https://reshare.ukdataservice.ac.uk/854598/

[760] Personal interview with Interview with former Liberal Hungarian MP Ms. Erika Torsok in Budapest, Hungary on 26 May 2017. See Interview_ID_38_Erika_Torsok at https://reshare.ukdataservice.ac.uk/854598/

[761] Personal interview with an anonymous political journalist from Vojvodina in Subotica, Serbia on 30 May 2017. See Interview_ID_44_Subotica_Journalist at https://reshare.ukdataservice.ac.uk/854598/

[762] Personal interview with Peter Kokai, Chairman of Magyar Mozgalom, in Senta, Serbia on 31 May 2017. See Interview_ID_46_Peter_Kokai at https://reshare.ukdataservice.ac.uk/854598/

Some interviewed for this thesis argued that the extraterritorial naturalisations exhibit strategic intent by examining the process by which the decision was made to conduct the practices:

> Lots of these things were carried out [by the Hungarian state with regards to the extraterritorial naturalisation], not concerned with the administrative way of doing things, they were carried out as special emergency measures, which means that there is trouble and we [the Hungarian state] have to do something.[763]

Hungary's extraterritorial naturalisations have had significant consequences for the political dynamic within the 'home states' in which they conduct the practice. 'It [extraterritorial naturalisations] has had a massive impact. Hungary now has the right to come to Serbia to talk to its people. These people are not only Serbian but legally and ethnically Hungarian; this is what has changed.'[764] Moreover, by developing policies that privilege co-ethnics, it generates support from nationalist communities at home: 'There is an element of ethnic outbidding, to favour relations with right-wing groups in Hungary.'[765]

It is significant to note that the Hungarian Ministry of Defence makes financial contributions to the accelerated extraterritorial naturalisation program's budget.[766] However, the expenditure details are not publicly available, with the Ministry of Defence channelling these funds through institutions such as the secretive NSKI. Officials at the NSKI interviewed for this thesis refused access to information relating to the extraterritorial naturalisation budget.

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[763] Personal interview with István Székely researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/
[764] Personal Interview with Elvira Kovács MP a Member of Serbian Parliament for the VMSZ, In Belgrade, Serbia on 23 May 2017. See Interview_ID_41_Elvira_Kovaćs at https://reshare.ukdataservice.ac.uk/854598/
[765] Personal interview with Interview with Professor Erin Jeanne, Central European University in Budapest, Hungary on 17 May 2017. See Interview_ID_35_Erin_Jeanne at https://reshare.ukdataservice.ac.uk/854598/
[766] Tóth, "Update: Changes in the Hungarian Citizenship Law and Adopted on 26 May 2010."

Ethnic political party alliance building

Hungary's extraterritorial naturalisations in the contiguous states have been coupled with and facilitated by ethnic political party co-optation and alliance building. The political partners of the Hungarian government are provided with financial and political support. In return, these political parties have assisted in the extraterritorial naturalisation process by generating and maintaining political support for Fidesz. This co-optation and alliance building has not come without criticisms, as it is suggested that be interfering in the party politics of another state has been detrimental to democratic processes. The State Secretary of Hungary, Árpád János Potápi, explains the situation with regards to the Hungarian government and ethnic political parties.

> The Hungarian government maintains strong ties with these parties and supports them. Such parties include the Democratic Alliance of Hungarians in Romania (RMDSZ), the Party of the Hungarian Community (MKP) in Slovakia, the Alliance of Vojvodina Hungarians (VMSZ) in Serbia, the Cultural Association of Hungarians in Transcarpathia (KMKSZ) in Ukraine, to mention only a few.[767]

Others have argued that there is a more complex dynamic to this relationship building.

> There is a typology of political partners. There are three types of party in Fidesz's understanding. The first is their partner, the second is tolerated, and the third is banned—the three 'T's in Hungarian. The first group are those they really rely on.[768]

While others have suggested, the alliance building is an example of clientelist relationship building. 'The assumption that they [Fidesz] are trying to build clients [in the neighbouring territories to Hungary] is basically right.'[769] Viktor Orbán argues that there is a need for this transborder ethnic political party partnership building.

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[767] Personal interview via email correspondence with State Secretary of Hungary Árpád János Potápi on 7 June 2017. See Interview_ID_39_Árpád_János_Potápi at https://reshare.ukdataservice.ac.uk/854598/
[768] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/
[769] Ibid.

> Parties are elected in order to concentrate all their efforts on governing. At the same time, we needed to recognise the importance of a network of satisfactory relations between political organisations of Hungarian communities in the Carpathian Basin: not only with the government but also with political parties; the government's network of relations is not a substitute for inter-party relations. [770]

This relationship-building process currently conducted by Fidesz is a result of the situation in each country in which they have a vested interest:

> They have three options [in organising the ethnic Hungarian political parties in the neighbouring states]. One, they instil one part in each surrounding country that they can cooperate with. Two, if this is not possible, then they can unite two political parties. Three, pick one of the two. They do this to gain control of the political situation and to centralise the political power within Hungary, extend the reach of the Hungarian state across borders and to obviously gain votes for Fidesz to achieve a supermajority. With this majority, Fidesz can declare a state of emergency against its enemies and bypass the remaining democratic processes that the country has.[771]

While others within government institutions mention the political support aspect of the ethnic political party alliance building:

> [In responding to the question: does Hungary support the election campaigns of Hungarian national minority parties?] The official answer is no. There is a declaration of support, but there always is a political intention. Formerly they prefer one party over another.[772]

However, alliance formation with the principal political party partners in the 'home states' is not all about ethnic identity politics. 'Nominally the policy of the Hungarian government is they are partners with the ethnic parties in the Carpathian Basin. That is simply not true. They

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[770] Viktor Orbán, "Prime Minister Viktor Orbán's Statement after a Delegation from Fidesz – Hungarian Civic Alliance and the Christian Democratic People's Party Met with a Delegation from the Party of the Hungarian Community. 11 April 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-statement-after-a-delegation-from-fidesz-hungarian-civic-alliance-and-the-christian-democratic-people-s-party-met-with-a-delegation-from-the-party-of-the-hungarian-community.

[771] Personal interview with an anonymous political journalist from Vojvodina in Subotica, Serbia on 30 May 30 2017. See Interview_ID_44_Subotica_Journalist at https://reshare.ukdataservice.ac.uk/854598/

[772] Personal interview with an anonymous NSKI official, in Budapest, Hungary on 15 May 2017. See Interview_ID_31_NSKI at https://reshare.ukdataservice.ac.uk/854598/

have strong preferences.'[773] Some have likened the competition for the Hungarian state support to a totalitarian tactic,

> This loyalty competition is not only here in kin-state policy issues. It is a general way of exercising power of Orbán. The complication and duplication of functions is how totalitarian structures function.[774]

Table 6 below shows how, for each of the states that make up the former Kingdom of Hungary, Fidesz has different political partners with varying degrees of political power.

Table 6. Ethnic Hungarian political party partners of Fidesz

	Partner	**Secondary Partner**	**Non-Partner**
Romania	Democratic Alliance of Hungarians in Romania (RMDSZ)	Hungarian Civic Party (MPP) or Hungarian People's Party of Transylvania (EMNP)	n/a
Slovakia	Party of the Hungarian Community (MKP)	n/a	Most–Híd
Serbia	Alliance of Vojvodina Hungarians (VMSZ)	Democratic Party of Vojvodina Hungarians (VMDP)	Hungarian Hope Movement (Magyar Remény Mozgalom)
Ukraine	Hungarian Party in Ukraine (KMKSZ)	n/a	n/a

The Hungarian state's principal political party partner in Romania is the Democratic Alliance of Hungarians in Romania (RMDSZ). However, the relationship between Hungary and the RMDSZ has not always been strong. Previously, Fidesz attempted to pressure the RMDSZ to

[773] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/

[774] Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

bring to power a Fidesz candidate within the RMDSZ.[775] This demand was rejected, leading to attempts by Fidesz to strengthen the Hungarian Civic Party (MMP) but failed given a lack of voters for this party.[776] The relationship between Fidesz and RMDSZ is strong again as Fidesz has changed course in their political party support in Romania. 'This support coming from Hungary has increased spectacularly starting in 2014'.[777] Much of this support has been official, but others argue there is a deeper, less official agreement in place: 'There are informal political agreements which are very spectacular in some cases; this includes the cooperation of the RMDSZ.'[778]

In Slovakia, Fidesz has abandoned political cooperation with the ethnic Hungarian political party with the most political power, Most-Hid. Instead, they favour the small party of the Hungarian Community (MKP), which they can control, in absolute terms. 'In Southern Slovakia, the partner organisation of Fidesz and the Christian Democratic People's Party is the Party of the Hungarian Community: this is how it was, how it is, and how it will be.'[779] For some, the fact that Most-Hid is unwilling to be controlled by Fidesz has forced Budapest to seek another partner in the state:

> Fidesz does not accept Most-Hid as a legitimate partner in the Hungarian-Hungarian dialogue. ... Their primary partner is MKP/SMK, and they have basically, again and again, expressed this belief. ... They have actively supported the MKP, policy-wise, financially certainly, with ideas, and they are extremely reluctant to work with us. ... This is strategic. Fidesz has this belief that they need to have a network of reliable partners in the Hungarian diaspora communities. ... [Most-Hid are] fully independent of Hungarian influence. ... Which makes us less, in their view, of a reliable partner.[780]

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[775] Tamás Kiss and István Gergő Székely, "Shifting Linkages in Ethnic Mobilization: The Case of RMDSZ and the Hungarians in Transylvania," *Nationalities Papers* 44, no. 4 (2016).
[776] Ibid.
[777] Personal interview with a professor of political science at a university in Cluj-Napoca on 29 May 2019. See Interview_ID_21_Professor_Political_Science_Cluj-Napoca at https://reshare.ukdataservice.ac.uk/854598/
[778] Ibid.
[779] Orbán, "Prime Minister Viktor Orbán's Statement after a Delegation from Fidesz – Hungarian Civic Alliance and the Christian Democratic People's Party Met with a Delegation from the Party of the Hungarian Community. 11 April 2017".
[780] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/

As with ethnic political partners in the states which make up for the former Kingdom of Hungary, Fidesz and Orbán believe these parties have a role in strengthening the position of Hungarians and the Hungarian state: '[Fidesz] basically believe that they [MKP] can further the cause of Hungarians in Slovakia, through external interference, both from Brussels and Budapest.'[781]

In Serbia, Fidesz and the Alliance of Vojvodina Hungarians (VMSZ) have a powerful political alliance: 'Fidesz supports the campaigning of VMSZ both politically and economically.'[782] Some have argued that the strength of their relationship essentially means the two are inseparable. 'They [VMSZ] are essentially a branch part of Fidesz with three political tools they use to gain power. They have a severe democratic deficit. They use methods of repression and form a cycle of terror.'[783] It has been suggested that the relationship between Hungary and the VMSZ is both political but also financial: 'I would say [there is] absolute total control [of the VMSZ by Fidesz]. I am absolutely certain that the VMSZ is being funded by Fidesz.'[784] For many, the reason for this alliance building with the VMSZ is to generate and strengthen power.

> Fidesz want to centralise political power in all the neighbouring countries. There is the same situation here in Vojvodina as it is in Hungary proper. No one can do anything, other than those in power. [785]

Others point to Viktor Orbán's network of businesses in Vojvodina connected to VMSZ and therefore to Hungary:

> Undoubtedly his [Viktor Orbán's] primary concern is to strengthen his position. He wants absolute control and wants to remain in charge of Hungary until his death. He takes the view that everyone can be bought and sadly, I think it is working. He surrounds himself with professionals and businessmen, and he knows people's price

[781] Ibid.
[782] Personal interview with Norbert Šinković, political journalist in Novi Sad, Serbia on 30 May 2017. See Interview_ID_45_Norbert_Šinković at https://reshare.ukdataservice.ac.uk/854598/
[783] Personal interview with Peter Kokai, Chairman of Magyar Mozgalom, in Senta, Serbia on 31 May 2017. See Interview_ID_46_Peter_Kokai at https://reshare.ukdataservice.ac.uk/854598/
[784] Personal interview with anonymous Vojvodina Hungarian radio journalist in Novi Sad, Serbia on 29 May 2017. See Interview_ID_42_Radio_journalist at https://reshare.ukdataservice.ac.uk/854598/
[785] Personal interview with Peter Kokai, Chairman of Magyar Mozgalom, in Senta, Serbia on 31 May 2017. See Interview_ID_46_Peter_Kokai at https://reshare.ukdataservice.ac.uk/854598/

> and their wants. Most of the politicians related to Fidesz and VMSZ have side businesses, and they can earn a lot of money combining business and politics.[786]

Fidesz's strong relationship with the VMSZ comes at the expense of other interest groups and political parties who are out of favour with the Hungarian state:

> The VMSZ control over the politics here in Vojvodina is so absolute that the Hungarian Movement (MM) has been classified as an 'an enemy of the Hungarian community'. ... Power consolidation and centralisation is occurring across all post-communist states. Fragmented political parties are considered wasted power that could be focused. [787]

The strength of the relationship between Hungary and VMSZ has broader implications for Hungary.

> The VMSZ and Fidesz have an extremely close relationship, and Hungarian- Serbian relations are at the strongest they have ever been. Hungary needs Serbia to cooperate with their plans to engage the Hungarian population here, and Serbia needs Hungary for their ambitions to get into the EU. It is, therefore, a strange interdependent relationship.[788]

Many interviewed for this thesis believe that Fidesz has illegally funded the VMSZ:

> I have absolutely no doubts that Fidesz finance the VMSZ. Of course, this is illegal, but they do it anyway. There is no transparency. You should know that very recently the VMSZ bought the most expensive building in Vojvodina, maybe even in Serbia to use as their home office. How did they get the money for this? [789]

In Ukraine, the relationship between the Hungarian Party in Ukraine (KMKSZ) and the Hungarian state is strong, with no viable alternative partners.

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[786] Personal interview with anonymous Vojvodina Hungarian radio journalist in Novi Sad, Serbia on 29 May 2017. See Interview_ID_42_Radio_journalist at https://reshare.ukdataservice.ac.uk/854598/
[787] Personal Interview with Ferenc Zsoldos, member of National Council of the Hungarian Ethnic Minority and Magyar Mozgalom in Senta, Serbia on 31 May 2017. See Interview_ID_47_Ferenc_Zsoldos at https://reshare.ukdataservice.ac.uk/854598/
[788] Personal interview with anonymous Vojvodina Hungarian radio journalist in Novi Sad, Serbia on 29 May 2017. See Interview_ID_42_Radio_journalist at https://reshare.ukdataservice.ac.uk/854598/
[789] Ibid.

External vote increase and transnational electoral gains

The changes to Hungarian fundamental law in 2010 that ultimately enabled the extraterritorial naturalisations conducted by Hungary involved a re-design of the Hungarian unicameral parliamentary electoral system. This means that 'every Hungarian citizen has the right to vote. There is no discrimination whether they live in Hungary or not.'[790] Under this new system, the external votes from the newly naturalised Hungarian citizens living abroad disproportionately benefit the incumbent government.[791] The consequence is that the practice has resulted in immediate transnational electoral gains for the incumbent government. The change to the electorate's boundaries that extraterritorial naturalisations have brought about has benefited Fidesz more than other Hungarian parties, as Viktor Orbán and his party were already extremely popular in these regions, even prior to extraterritorial naturalisations being conducted. In Serbia, 'Fidesz are extremely popular. I imagine around 90 per cent of the Vojvodina Hungarians would vote for them.'[792] In 2017, Hunor Keleman, a member of Romania's Chamber of Deputies who serves as president of the UDMR party, suggested,

> The vast majority, at least 75 or 80 per cent [of the recently naturalised Hungarian citizens in Romania eligible to vote in Hungarian presidential elections] according to our own opinion polls, will vote Fidesz for sure ... and it could be even higher.[793]

The conferral of Hungarian citizenship to these populations, either from an instrumental or symbolic perspective, would undoubtedly improve Viktor Orbán's Fidesz party's popularity.

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[790] Personal interview with the Legal Advisor to the Hungarian Ministry of Foreign Affairs in Budapest, Hungary on 16 May 2017. See Interview_ID_33_Legal_Advisor_Hungarian_MFA at https://reshare.ukdataservice.ac.uk/854598/

[791] Organization for Security and Co-operation in Europe (OSCE), "Hungary, Parliamentary Elections, 6 April 2014: Statement of Preliminary Findings and Conclusions," (2014); Kim Lane Scheppele, "Legal but Not Fair: Viktor Orbán's New Supermajority," https://verfassungsblog.de/legal-but-not-fair-viktor-orbans-new-supermajority/.

[792] Personal interview with anonymous Vojvodina Hungarian radio journalist in Novi Sad, Serbia on 29 May 2017. See Interview_ID_42_Radio_journalist at https://reshare.ukdataservice.ac.uk/854598/

[793] Lili Bayer, "Viktor Orbán Courts Voters Beyond 'Fortress Hungary'," Politico, https://www.politico.eu/article/viktor-orban-courts-voters-in-transylvania-romania-hungarian-election-2018/.

Therefore, the electorate's boundaries are expanded to include a group of persons more likely to vote for the agents expanding the boundaries.

> Law CCIII/2011 ... codified an extremely disproportioned electoral system ... favouring voters without a registered domestic address as opposed to those having it ... Voter representation was further distorted by the fact that votes for the winners on the ballot of individual candidates came to be counted repeatedly to determine the winners from the other, the national (party-delegated) runners ('award premium'). The combined effect of these two features accounted for the fact that Fidesz secured two-thirds of the seats in parliament, despite losing approximately one-fourth of its constituents.[794]

The extraterritorial naturalisations resulted in a raw increase in external eligible voters in Hungarian presidential elections; a total of 378,449 voters without an in-country domicile were registered for these [2018] elections, up from 193,793 in the 2014 elections.[795] The consequence has concerned those worried about the quality of democracy in Hungary:

> The differing voting procedures for voters abroad with and without in-country domicile challenged the principle of equal suffrage and was perceived by some of the OSCE's Office for Democratic Institutions and Human Rights (ODIHR) Limited Election Observation Mission (LEOM) interlocutors as an attempt to differentiate voting rights based on partisan grounds.[796]

This alteration in the system has resulted in a ratcheting effect as the allocation of 'a disproportional share of mandates to the winning party, the governing coalition led by Fidesz seems to be trying to preserve its current overwhelming power for the next elections'.[797]

The ethnic political party partners of Fidesz in Transcarpathia, have assisted in the extraterritorial naturalisation process and in getting these recently naturalised Hungarians to vote in Hungarian elections: 'There is financial support to VMSZ from the Hungarian government and helping this party mobilises votes for Fidesz.'[798] In a personal interview,

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[794] Imre Vörös, "A "Constitutional" Coup in Hungary between 2010–2014," in *Twenty-Five Sides of a Post-Communist Mafia State* (Central European University Press, 2017), 45.
[795] Organization for Security and Co-operation in Europe (OSCE), "Hungary, Parliamentary Elections, 6 April 2014: Statement of Preliminary Findings and Conclusions."
[796] Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights, "Hungary Parliamentary Elections 8 April 2018," https://www.osce.org/files/f/documents/0/9/385959.pdf.
[797] Vörös, "A "Constitutional" Coup in Hungary between 2010–2014," 45.
[798] Personal interview with Interview with Professor Tibor Varády, Central European University in Budapest, Hungary on 18 May 2017. See Interview_ID_36_Tibor_Varady at https://reshare.ukdataservice.ac.uk/854598/

Serbian MP, Elvira Kovács, suggested the party's strategy with regards to helping Fidesz achieve its political goals:

> We will do everything in power to help Fidesz gets the votes they need. We for sure understand that at the last election and referendum, turnout was poor. This is something we have to address this (*sic*) for the next election.[799]

The RMDSZ Member of the Romanian Chamber of Deputies stressed the importance of these votes during a personal interview: 'It is very important in the Hungarian parliament, the votes they can be many thousand, a hundred thousand, for example, being only two or three members in the Hungarian parliament.'[800]

Transborder campaigning by Hungarian state officials has been a feature of their ethnic political party partner mobilisation is extraterritorial campaigning by Hungarian state officials:

> Although there is a high degree of political control, it is interesting that when Fidesz campaigns in Vojvodina they always do it from the point of view that it is simply important to vote and Orbán tells us all 'vote for who you think is the most sympathetic to you'. This is an indirect way of saying 'vote for us!' They also mention that it is the Hungarian duty to vote.[801]

Some interviewed for this thesis correlate intensive Hungarian state involvement with ethnic political parties, with the capacity to obtain additional votes in these regions:

> Even though most Hungarian Slovakians would gain nothing by taking Hungarian citizenship, and many would not bother, they felt disgusted that Slovakia denied them the choice and opportunity. Now that it is illegal to take Hungarian citizenship, we can see that the engagement policies of Hungary within Slovakia are the least intensive. It is a side effect of these policies that now they are unable to gain voters from Slovakia, so the incentive is not there for them to invest politically and economically as much in the region as elsewhere. There is no direct political capital Fidesz and Orbán can get at, so they are not generously supported.[802]

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[799] Personal Interview with Elvira Kovács MP a Member of Serbian Parliament for the VMSZ, In Belgrade, Serbia on 23 May 2017. See Interview_ID_41_Elvira_Kovaćs at https://reshare.ukdataservice.ac.uk/854598/
[800] Personal Interview with Antilla Korodi - UDMR Member of Romanian Chamber of Deputies in Bucharest, Romania on 4 June 2019. See Interview_ID_23_Antilla_Korodi at https://reshare.ukdataservice.ac.uk/854598/
[801] Personal interview with anonymous Vojvodina Hungarian radio journalist in Novi Sad, Serbia on 29 May 2017. See Interview_ID_42_Radio_journalist at https://reshare.ukdataservice.ac.uk/854598/
[802] Personal interview with Géza Tokár, Spokesperson of the Roundtable of Hungarians in Slovakia, in Budapest, Hungary on 25 May 2017. See Interview_ID_48_Géza_Tokár at https://reshare.ukdataservice.ac.uk/854598/

Viktor Orbán has been vocal in publicly urging recently naturalised Hungarians to vote in elections, both for Fidesz and their political partners:

> I am asking Hungarians living in Ukraine to take part in the elections at the weekend under any circumstances and to vote for the Hungarian lists. And I would like to ask your assistance, the assistance of the media, in calling upon Hungarians who have the right to vote in Ukraine – but who have come over to Hungary from Ukraine to live, study or work in Hungary – to be so kind as to go home and support with their votes the Hungarian political organisations which are active in Ukraine, in Transcarpathia.[803]

Later, in a 2017 Romanian daily newspaper, Viktor Orbán stated:

> In order for them to vote in the election, they must register; they shouldn't leave it to the last minute, as that will lead to undue haste and will result in lost votes. I urge every Hungarian to register; this registration is now nothing less than enrolment in a brighter shared Hungarian future.[804]

Hungarian officials have occasionally been open in their attempts to increase the number of votes for the incumbent government through extraterritorial naturalisations:

> It was my life goal to unite the nation by means of public law. Symbolically speaking it has been achieved by granting citizenship to 1 million Hungarians. … These people know exactly that their nation is the Hungarian nation, their home is this country and they also know what their moral obligation and reasonable interest are on 8 April [day of the parliamentary elections]. So I am sure that the support of the Fidesz-KDNP will be way above 90% among ethnic Hungarians living abroad. And I am also certain that this will yield more mandates than four years ago.[805]

However, oppositional parties have been critical of this tactic:

> The big issue [during the 2004 referendum on granting citizenship to trans-border Hungarians] was the voting rights that would follow, and now we see why this was a concern for many. It has been disastrous and creates an absurd situation where our

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[803] Viktor Orbán, "Prime Minister Viktor Orbán's Doorstep Statement Made after His Meeting with Kmksz President László Brenzovics. 20 October 2015," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/prime-minister-viktor-orban-s-doorstep-statement-made-after-his-meeting-with-kmksz-president-laszlo-brenzovics.
[804] "Interview with Prime Minister Viktor Orbán in the Romanian Daily Krónika. 5 October 2017," Website of the Hungarian Government, https://2015-2019.kormany.hu/en/the-prime-minister/the-prime-minister-s-speeches/interview-with-prime-minister-viktor-orban-in-the-romanian-daily-kronika.
[805] Deputy Prime Minister, Zsolt Semjén, October 2018 in a television interview found in Viktor Z. Kazai, "Expanding the Franchise – Another Sleight of Hand by the Hungarian Government?," Verfassungsblog, https://verfassungsblog.de/expanding-the-franchise-another-sleight-of-hand-by-the-hungarian-government/.

> election and even our constitution can be influenced by those living in another sovereign territory.[806]

Even those within the government have warned that the system is open to manipulation.

> Because we have a unicameral parliament, we do not have a senate, a senate would be great, where the nationalities were represented there because that is the purpose of the senate. But we did not want to create a situation where they have an over-representation, as the vote they represent is less than 10 per cent, much less 1 to 5 per cent. The role these nationalities may be much more important than the people they represent, then they would be in the battlefield of the parties. ... It is a situation that needs to be dealt with prudence, yes there is preferential treatment, but if there are a few people, they might be in a position where the preferential vote and the whole concept will change, and they will be the toys of the party.[807]

It should be noted that some are sceptical of the argument that the extraterritorial naturalisations have been done to increase eligible voters but concede this is a consequence of the practice: 'I believe the dual citizenship was done with good intentions which can then get them votes.'[808] By addressing the needs of the Hungarian state, over the ethnic Hungarian communities, the Hungarian parties are accountable to, they fail to be representative of these communities. However, some of those loyal to Fidesz defend the practice.

> Hungarian oppositional parties often claim that the Hungarian nationals abroad who decide the fate of the elections, but this is not true. If you see the numbers, you see that a small fraction of Hungarians who vote. Yes, they vote for the government, but this is because the oppositional governments are against the Hungarians abroad.[809]

Although the current figures suggest that the number of seats obtained by Fidesz through the external votes of recently naturalised Hungarians may be small, the potential for there to be significant electoral consequences is present.

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[806] Personal interview with Interview with former Liberal Hungarian MP Ms. Erika Torsok in Budapest, Hungary on 26 May 2017. See Interview_ID_38_Erika_Torsok at https://reshare.ukdataservice.ac.uk/854598/
[807] Personal interview with the Legal Advisor to the Hungarian Ministry of Foreign Affairs in Budapest, Hungary on 16 May 2017. See Interview_ID_33_Legal_Advisor_Hungarian_MFA at https://reshare.ukdataservice.ac.uk/854598/
[808] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/
[809] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/

> We can see that Hungarians in Romania have a tendency, 90 per cent of them, to vote for the current Prime Minister. When the election results are close, then this difference could make a big difference. ... There could come a time when the current ruling party of Hungary could secure another term in office with the aid of the votes of the Hungarians living outside of [the] country.[810]

Demographic considerations

As with the Russian Federation, Hungary has a severe demographic deficit. Since 2010, the Hungarian state has had a negative natural change of -388,667, as shown by the demographic data provided in Table 7 below. The reasons for this are fairly typical for many states, a birth rate below the reproduction rate, coupled with emigration to other states, mainly other EU member states, means that there are fewer people in Hungary than previously. The population is also ageing, meaning that the workforce is in net decline.

[810] Personal interview with István Székely – Executive Vice President of RMDSZ in Cluj-Napoca on 27 May 2019. See Interview_ID_20_István_Székely at https://reshare.ukdataservice.ac.uk/854598/

Table 7. Demographic Statistics of Hungary[811]

	Average population	Live births	Deaths	Natural change	Crude birth rate (per 1000)	Crude death rate (per 1000)	Natural change (per 1000)	Total Fertility Rate
1990	10,374,823	125,679	145,660	-19,981	12.1	14	-1.9	1.84
1991	10,373,153	127,207	144,813	-17,606	12.3	14	-1.7	1.85
1992	10,373,647	121,724	148,781	-27,057	11.7	14.3	-2.6	1.76
1993	10,365,035	117,033	150,244	-33,211	11.3	14.5	-3.2	1.68
1994	10,350,010	115,598	146,889	-31,291	11.2	14.2	-3	1.64
1995	10,336,700	112,054	145,431	-33,377	10.8	14.1	-3.2	1.57
1996	10,321,229	105,272	143,130	-37,858	10.2	13.9	-3.7	1.45
1997	10,301,247	100,350	139,434	-39,084	9.8	13.6	-3.8	1.37
1998	10,279,724	97,301	140,870	-43,569	9.5	13.7	-4.2	1.33
1999	10,253,416	94,645	143,210	-48,565	9.2	14	-4.7	1.29
2000	10,221,644	97,597	135,601	-38,004	9.6	13.3	-3.7	1.32
2001	10,200,298	97,047	132,183	-35,136	9.5	13	-3.4	1.31
2002	10,174,853	96,804	132,833	-36,029	9.5	13.1	-3.5	1.3
2003	10,142,362	94,647	135,823	-41,176	9.3	13.4	-4.1	1.27
2004	10,116,742	95,137	132,492	-37,355	9.4	13.1	-3.7	1.27
2005	10,097,549	97,496	135,732	-38,236	9.7	13.5	-3.8	1.3
2006	10,076,581	99,871	131,603	-31,732	9.9	13.1	-3.2	1.34
2007	10,066,158	97,613	132,938	-35,325	9.7	13.2	-3.5	1.31
2008	10,045,401	99,149	130,027	-30,878	9.9	13	-3.1	1.35
2009	10,030,975	96,450	130,350	-33,900	9.6	13	-3.4	1.32
2010	10,014,324	90,335	130,456	-40,121	9	13	-4	1.25
2011	9,985,722	88,049	128,795	-40,746	8.8	12.9	-4.1	1.23
2012	9,931,925	90,269	129,440	-39,171	9.1	13	-3.9	1.34
2013	9,908,798	88,689	126,778	-38,089	9	12.8	-3.9	1.34
2014	9,877,365	91,510	126,308	-34,798	9.3	12.8	-3.5	1.41
2015	9,855,571	91,690	131,697	-40,007	9.3	13.3	-4	1.44
2016	9,830,485	93,063	127,053	-33,990	9.5	12.9	-3.2	1.49
2017	9,797,561	91,577	131,674	-40,097	9.4	13.5	-4.1	1.49
2018	9,778,371	89,807	131,045	-41,238	9.2	13.4	-4.2	1.49
2019	9,772,756	89,193	129,603	-40,410	9.1	13.3	-4,1	1.49

[811] Hungarian Central Statistical Office, "An Indicator System for Social Progress," https://www.ksh.hu/thm/tablak.html.; "Population, Popular Movement (1900–)," https://www.ksh.hu/docs/hun/xstadat/xstadat_hosszu/h_wdsd001a.html?579.

It perhaps seems evident that the extraterritorial naturalisation policy is a means to encourage migration to Hungary; however, the Hungarian state's official position is that this is not the case. 'Hungarian government policy does not want these types of measures [to encourage migration to Hungary].'[812] *Prima facie* it might appear to be contradictory to pursue a strategy of attracting workers to people to Hungary with that of a strategy to maintain a naturalised Hungarian population in the contiguous neighbouring territories. However, this is not the case for two reasons; first, there is variation within the naturalised population's socio-demographics. Some who are recently naturalised are of working age, others not, and some who might be encouraged to emigrate to Hungary, and others who would not. Hungary, therefore, is pursuing two strategies aimed at different groupings. To address the demographic decline, those the Hungarian state seeks to attract to Hungary are of reproductive and working age. Secondly, publicly admitting an objective to encourage the emigration of other states' citizens would almost certainly result in an international backlash and damage to diplomatic and interstate relations, as well as causing upset among Hungarian communities in these territories.

Hungary's official position that it has not conducted extraterritorial naturalisations to encourage migration to Hungary has been challenged by most interviewed for this thesis. 'When Hungary says that they want to have the Hungarian minorities beyond the borders to stay where they are. ... that is absolutely not the case.'[813] An ethnic Hungarian professor of political science in Cluj-Napoca suggests the issue is to do with the diminishing Hungarian labour force.

> The Hungarian state has a very serious demographic problem. ... I have seen confidential internal government documentation stating the following terms. Hungary, in order to keep its pace of economic development, needs each year, twenty thousand new people for their labour force. That was in around 2000. This paper said that, instead of bringing Chinese who would be happy to come, it is much more normal to bring

[812] Personal Interview with Antilla Korodi - UDMR Member of Romanian Chamber of Deputies in Bucharest, Romania on 4 June 2019. See Interview_ID_23_Antilla_Korodi at https://reshare.ukdataservice.ac.uk/854598/
[813] Personal interview with a professor of political science at a university in Cluj-Napoca on 29 May 2019. See Interview_ID_21_Professor_Political_Science_Cluj-Napoca at https://reshare.ukdataservice.ac.uk/854598/

> Hungarians from the countries abroad who are educated, who are prepared, and who are culturally no problem. ... This the declaration from the top level ... The head of the chief statistical institution in Hungary said that he has a big problem with demography, there are no perspectives that this could improve, but we have a demographic reserve outside the border which they can refer to any time they need it.[814]

Some who argued that addressing the demographic imbalance is the intention of the extraterritorial naturalisation policies, and the official position lacks coherence:

> Hungary now invests a lot in order for people to stay here, which is not very logical from the Hungarian point of view, as their population is diminishing rapidly as people move abroad. But they want people to stay here; this is partly because they want to have political influence on the local situation.[815]

Even those within the Hungarian state, imply the official position vis-à-vis attracting migration to Hungary is not necessarily accurate:

> We need to maintain our population there. But the policy is not always coherent, but there is a lack of labour force in Hungary. It was not the intention to affect migration, but in Transylvania, there is no chance to maintain population long term; therefore, it may be better they move to Hungary.[816]

Others point to the difference in rhetoric and practices and a brain-drain from the Hungarian communities outside of Hungary:

> [Hungary's motivation in conducting extraterritorial naturalisations] is both instrumental and symbolic. ... Fidesz really thinks of Hungarians in Slovakia, certainly in Romania, as a potential source of manpower. They were happy to bring additional Hungarians to Hungary. We think we should succeed here at home. We are not very happy to see a population decline, or our best going away to Budapest. ... Nominally Fidesz would not say 'come home' but many of their policies, the stipends that they give, the free high-school and university education for those that stay in Hungary, these are all forms of brain-drain.[817]

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[814] Ibid.
[815] Personal interview with Laszlo Zubanych - UDMSZ Berehove in Berehove, Ukraine on 22 May 2019. See Interview_ID_15_Laszlo_Zubanych at https://reshare.ukdataservice.ac.uk/854598/
[816] Personal interview with an anonymous NSKI official, in Budapest, Hungary on 15 May 2017. See Interview_ID_31_NSKI at https://reshare.ukdataservice.ac.uk/854598/
[817] Personal interview with Ábel Ravasz, Most-Hid MP and Plenipotentiary for Roma community in Slovakian parliament in Bratislava, Slovakia on 21 June 2017. See Interview_ID_50_Abel_Ravasz at https://reshare.ukdataservice.ac.uk/854598/

The Hungarian state has a clear anti-immigration agenda, and although there is a demographic deficit, some interviewed for this thesis have suggested the Hungarian state believe, 'we do not want [non-*Magyar*] migrants, we want people that we know, people we could trust.'[818]

Those that have furthered this argument suggest ethnic preferentialism is a significant part of this decision to conduct extraterritorial naturalisations:

> Another issue could be this kind of demographic relevance, Hungary struggles with demographic issues, struggles with a labour force shortage, and it is not explicit policy to attract Transylvanian Hungarians to Hungary, but if they would like to make a demographic reproduction through migrants, they would prefer migrants who are ethnically closer.[819]

While others point at the lack for any assimilation policies that bringing these recently naturalised Hungarians into Hungary would require:

> Their [Hungary's] young people have chosen to migrate towards western Europe for work, and if you look at the birth rate, you can see that families usually have 1.3 or 1.4 children. ... Hungary has always been not too keen on people from a different culture or of a different language to join their country, so this [extraterritorial naturalisation] is the political solution to the demographic decline. So I think that Hungary has chosen to see Hungarians living here [Transylvania] as a solution to the demographic problem because the integration of our Hungarian community to the Hungarian community would be seamless.[820]

Developing the economy, a key objective for Viktor Orbán's government is contingent on a stable or expanding population:

> There's a lot of speculation [about the intentions of the Hungarian state]. Some people believe it [extraterritorial naturalisations] is a clearly long-term strategy. Hungary is in demographic decline, and the Hungarian state is not willing to fully integrate the Roma order migrants, so the only way to keep the Hungarian economy going is to attract the Hungarians abroad.[821]

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[818] Personal interview with Béla Keszegh, Deputy Mayor for Komárno, in Komárno, Slovakia on 26 June 2017. See Interview_ID_52_Béla_Keszegh at https://reshare.ukdataservice.ac.uk/854598/

[819] Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[820] Personal interview with István Székely – Executive Vice President of RMDSZ in Cluj-Napoca on 27 May 2019. See Interview_ID_20_István_Székely at https://reshare.ukdataservice.ac.uk/854598/

[821] Personal interview with Kalman Petocz, Senior Advisor at Academia Istropolitana Nova, in Bratislava, Slovakia on 23 June 2017. See Interview_ID_49_Kalman_Petocz at https://reshare.ukdataservice.ac.uk/854598/

While Viktor Orbán has been explicit in highlighting the demographic issues facing Hungary, he has not suggested conducting extraterritorial naturalisations are a means to address this. However, others say it is the only feasible solution he has:

> [Viktor Orbán] was talking about his policy of helping of fostering demographic reproductivity in Hungary. He said very clearly. We do not need immigration. We want to resolve it ourselves. But when is it going to produce a visible result on the labour force once he starts? 18 years at least.[822]

The impact of the extraterritorial naturalisation practices regarding encouraging immigration to Hungary has not been felt evenly across all of the 'home states'. For instance, with regards to Slovakian Hungarians, the Hungarian state has little economic attraction for potential *Magyar* migrant workers:

> Unofficially Hungary would have an interest to absorb and attract a workforce from here, but it is nearly impossible, not to mention the fact that the wages in Slovakia are a little bit higher [than they are in Hungary].[823]

Likewise, in Romania, it is unlikely that extraterritorial naturalisations would result in migration to Hungary. However, some have argued that there is an intent to create a situation whereby mass migration to Hungary would be feasible in the future:

> The Hungarians living in Transylvania are not represented within the executive power structures in Romania. The political culture has shifted from Bucharest oriented to Budapest oriented. ... the Hungarian state does everything to attract to ethnic Hungarians from the Romania state and to absorb them into, and make them dependent on, the Hungarian state.[824]

Some have suggested that the Romanian state has tolerated such intention as it would create a win-win for both states:

> The framework of historical reasoning it is somehow paradoxical. There was irritation with the extension of rights and possibilities for ethnic Hungarians in Romania by the Hungarian state. It was proved that they have connections, and they could be loyal to

[822] Personal interview with a professor of political science at a university in Cluj-Napoca on 29 May 2019. See Interview_ID_21_Professor_Political_Science_Cluj-Napoca at https://reshare.ukdataservice.ac.uk/854598/
[823] Personal interview with Attila Lancz, Member of SMK in Bratislava, Slovakia on 22 June 2017. See Interview_ID_51_Attila_Lancz at https://reshare.ukdataservice.ac.uk/854598/
[824] Personal interview with a professor of political science at a university in Cluj-Napoca on 29 May 2019. See Interview_ID_21_Professor_Political_Science_Cluj-Napoca at https://reshare.ukdataservice.ac.uk/854598/

> the Hungarian state while living in Romania. At the same time [from the Romanian nationalist perspective] there was a sign of relief. Because, ultimately, if they leave, and to go to Hungary, and work, that means that the demography of Romania changes to end of those who want a more uniform and ethnically based state.[825]

Others argue that there is a tacit agreement between the two states to facilitate mass migration of ethnic Hungarians to Hungary:

> There is a tacit agreement between the two states. The Romanians do not need Hungarians. They would like to get rid of them. The Hungarians need Romanians. ... There is a tacit agreement for a long-term solution. ... All the other support from Hungary, can be read in the same key, providing support to kindergarten, support to schools, ... professional schools, and vocational schools.[826]

Conversely, within Ukraine and Serbia, there has been more significant emigration from these states. As Serbian MP, Elvira Kovacs argues, 'Hungary sees the Hungarians living here [Vojvodina] as a cheap workforce.'[827] While the Governor of Zakarpattia says the logic is clear:

> If you look at Hungary, they have a bigger problem. They have towns where 60 per cent of people who cannot do any work and have left. They do not have any doctors, so they cannot run their hospitals. So they are taking everybody they can from here to fulfil their positions.[828]

However, there are essential differences in the migratory flows between these two states:

> If you monitor the institutional processes, I think that it would be clear this was an intention [to attract ethnic Hungarians to Hungary]. Concerning the migratory process, we should distinguish between Transcarpathia and Vojvodina. In Vojvodina you have very well-developed networks of migration, even starting in the 70s or 60s towards Austria, Sweden, Germany, Switzerland, and of course people with Hungarian citizenship can use these networks. In case of Hungarians from Ukraine, I think that the proportion of those who enter Hungary, and not Western European states is more significant than Serbian Hungarians. For them, east of Hungary is an attractive place. Eastern Hungary is attractive, in the case of Vojvodina, they are much more ambivalent. In this case, many people used Hungarian citizenship to migrate towards Germany or

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[825] Personal interview with Claudiu Crăciun - Lecturer of European Politics at National School of Political Science and Public Administration Bucharest in Bucharest, Romania on 30 May 2019. See Interview_ID_22_Claudiu_Crăciun at https://reshare.ukdataservice.ac.uk/854598/

[826] Personal interview with a professor of political science at a university in Cluj-Napoca on 29 May 2019. See Interview_ID_21_Professor_Political_Science_Cluj-Napoca at https://reshare.ukdataservice.ac.uk/854598/

[827] Personal Interview with Elvira Kovács MP a Member of Serbian Parliament for the VMSZ, In Belgrade, Serbia on 23 May 2017. See Interview_ID_41_Elvira_Kovaćs at https://reshare.ukdataservice.ac.uk/854598/

[828] Personal Interview with Yaroslav Halas - Governor of Zakarpattia in Uzhhorod, Ukraine on 22 May 2019. See Interview_ID_16_Yaroslav_Halas at https://reshare.ukdataservice.ac.uk/854598/

> Austria. In Transcarpathia, it is not so significant. They do not have the networks to do so. They might develop, but it takes time.[829]

Hungary's goal of encouraging the migration of *Magyars* to Hungary has not been universally successful. Many of those interviewed for this thesis in Serbia and Ukraine confirmed that their communities had experienced widespread emigration due to the extraterritorial naturalisations, often with devastating consequences on the communities, mainly rural communities. Some assert that the migration had not been to Hungary as intended, but to other states such as Austria, Germany and the United Kingdom.

> Yes [the intention was to encourage migration to Hungary]. Absolutely. We need work, and they need workers. I have no doubt. However, this did not happen either. The people here ended up migrating to Germany, London, Austria. Whole families moved. It has been devastating for our community. The census conducted in 2011 had the Hungarian population at 250,000. Now it is less than 200,000. It is by far the biggest problem here. It is costing jobs, affecting education.[830]

The extraterritorial naturalisations conducted by Hungary have had mixed consequences for the Hungarian communities:

> It [the Hungarian extraterritorial naturalisations in Ukraine] is fifty/fifty with regards to positive and negatives. The positive is that it opened the world to the people; they got more experience. The negative is that the local community becomes less and less populated. ... There is a black swan factor, Hungary itself feels this shortage of labour. ... But the programmes that provide financial incentives for increasing childbirth are only applicable to those that live in Hungary and have their registration in Hungary. So when this starts, with the help to buy houses, the migration from here will be even more intensified.[831]

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[829] Personal interview with Tamás Kiss, researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/

[830] Personal interview with Peter Kokai, Chairman of Magyar Mozgalom, in Senta, Serbia on 31 May 2017. See Interview_ID_46_Peter_Kokai at https://reshare.ukdataservice.ac.uk/854598/ See also, Personal interview with an anonymous political journalist from Vojvodina in Subotica, Serbia on 30 May 2017. See Interview_ID_44_Subotica_Journalist at https://reshare.ukdataservice.ac.uk/854598/

[831] Personal interview with Laszlo Zubanych - UDMSZ Berehove in Berehove, Ukraine on 22 May 2019. See Interview_ID_15_Laszlo_Zubanych at https://reshare.ukdataservice.ac.uk/854598/

Economic considerations

Within the official Hungarian document, Policy for Hungarian Communities Abroad: Strategic Framework for Hungarian Communities, it states that supporting Hungarian communities in the Carpathian basin is worthwhile because 'linguistic and cultural diversity also have economic benefits.'[832] This document, nor any other official documentation from Hungary specifies what form these economic benefits take. A further document entitled The Program of National Cooperation states that the extraterritorial naturalisations are necessary to fulfil Hungary's restoration of the Carpathian Basin Economic Space.[833] Others have suggested that the extraterritorial naturalisations conducted by Hungary help fulfil these long-term economic objectives.

> It is part of a long-term strategy to normally and naturally transform Hungary. Not irredentist in thinking, but for Hungary to become a natural economic leader of a central European region. ... The citizenship law is only one of the instruments that Mr Orbán uses to fix his power. [834]

One official at the NSKI explicitly referred to the economic benefits of extraterritorial naturalisations in an often-contradictory manner, alluding to the potential for several strategies being pursued simultaneously:

> Hungary sees the Hungarians living abroad as a valuable economic resource. These are special areas populated by Hungarians and Hungary has an ability to network and gain influence in these territories because of the relationship with the Hungarians living there.[835]

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[832] State Secretariat for Hungarian Communities Abroad, "Policy for Hungarian Communities Abroad: Strategic Framework for Hungarian Communities Abroad," (Ministry of Public Administration of Justice, 2013).
[833] Hungarian Office of the National Assembly, "The Programme of National Cooperation," (Hungarian Government, 2010).
[834] Personal interview with Kalman Petocz, Senior Advisor at Academia Istropolitana Nova, in Bratislava, Slovakia on 23 June 2017. See Interview_ID_49_Kalman_Petocz at https://reshare.ukdataservice.ac.uk/854598/
[835] Personal interview with an anonymous NSKI official, in Budapest, Hungary on 15 May 2017. See Interview_ID_31_NSKI at https://reshare.ukdataservice.ac.uk/854598/

Viktor Orbán alludes to an economic policy that involves the regions beyond the territorial borders of the state:

> So we do not just need the economy in Hungary to yield growth and provide us with all sorts of advantages, but we also need to find ways to strengthen the position of the place which is our homeland and which we commonly refer to as Hungary: the country which, in its current condition, is the size that it is – though of course when we speak about our motherland, we think in terms of a national community in the Carpathian Basin. And our economic policy decisions should also be perceived in that dimension.[836]

Although Hungarian political stakeholders ambiguously deem the Hungarians living abroad as an economic resource, there has been massive investment in these communities, with little return on these investments. The Hungarian government has invested significantly in Transcarpathia, directly by conducting extraterritorial naturalisation practices and indirectly through programmes that involve recently naturalised Hungarian citizens. One such programme, known as the Prosperitati Foundation, has involved significant funds being invested in Vojvodina, Serbia. According to the foundation's website,

> As a Hungarian regional and community development foundation in Vojvodina, the Prosperitati Foundation is a voluntary, non-governmental and non-profit foundation established for an indefinite period of time to carry out charitable goals.[837]

Between 2015 and 2019, the fund's investment totalled 273 million euros.[838] The programme provides grants and low-interest loans to Hungarians in Vojvodina to generate critical industries such as tourism, agriculture, manufacturing, and IT, providing grants for Vojvodina Hungarians to purchase housing in the region. Although the funding channels are supposedly independent of the state and political parties, many interviewed for this thesis suggest Fidesz and their political allies control them.

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[836] Orbán, "Prime Minister Viktor Orbán's Speech at the Hungarian Chamber of Commerce and Industry's Ceremony to Mark the Start of the 2017 Business Year. 28 February 2017".
[837] Prosperitati Foundation, "Rólunk".
[838] "A Prosperitati Alapítvány 2019. Évi Munkajelentése," https://www.prosperitati.rs/sites/default/files/dokumentumok/a_prosperitati_alapitvany_2019-es_evi_munkajelentese.pdf.

> There are three channels of financial support from Hungary. The Prosperitati Foundation and the Bethlen Gábor Alap. This foundation was founded to help and support Hungarian communities in supporting countries. It is a controlled process to give financial support for NGOs, schools, and institutions. This is strongly controlled by Fidesz and VMSZ, in fact, absolutely controlled. Only those loyal to each of these parties are able to receive this money. The third channel is money that is given to the Hungarian National Council with the same selection process. Everything in the Hungarian National Council is controlled by VMSZ. In this way, although they are not supposed to finance this party, this is done indirectly through these channels.[839]

Many interviewed for this thesis believe that Hungary's funding channels in Serbia provide funds to ethnic political party partners to strengthen alliances with these parties.

> The massive amount of money that flows into Vojvodina is large unaccountable. There is no obligation to make this money transparent and visible. We interpret this as money laundering as we have estimated that 30 per cent of the money invested, about 50 billion HUF, flows back into Hungary, 30 per cent goes to Orbán's political allies in Vojvodina through the VMSZ, and only 40 per cent actually goes to the Hungarians in Serbia.[840]

Others have pointed to evidence of corruption at a local level.

> It is hard to prove that there is high-level corruption here, but we all know of the micro-corruption. In one village, it became known that if you paid 500 euros, you could win the grant. A list was leaked a few years ago which had the names of the people who would get the money. Nearly all of these people were connected to the VMSZ. István Pásztor [President of the Alliance of Vojvodina Hungarians] already knows who is going to get the big money, and the application process is just a façade. The selection committee is itself selected by Pásztor. He will release the money just before the election to remind everyone who they should vote for.[841]

The alleged corruption extends to the top of the Hungarian state. 'The extraterritorial naturalisations have also fostered clientelist relations and resulted in high-level Hungarian corruption. Viktor Orbán is now the second richest man in Hungary.'[842] The political elite in Vojvodina has been the primary recipients of the money coming from Hungary.

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[839] Personal interview with Peter Kokai, Chairman of Magyar Mozgalom, in Senta, Serbia on 31 May 2017. See Interview_ID_46_Peter_Kokai at https://reshare.ukdataservice.ac.uk/854598/
[840] Personal interview with Interview with former Liberal Hungarian MP Ms. Erika Torsok in Budapest, Hungary on 26 May 2017. See Interview_ID_38_Erika_Torsok at https://reshare.ukdataservice.ac.uk/854598/
[841] Personal Interview with Ferenc Zsoldos, member of National Council of the Hungarian Ethnic Minority and Magyar Mozgalom in Senta, Serbia on 31 May 2017
[842] Personal interview with Interview with Professor Erin Jeanne, Central European University in Budapest, Hungary on 17 May 2017. See Interview_ID_35_Erin_Jeanne at https://reshare.ukdataservice.ac.uk/854598/

> By giving people who are political engaged in Vojvodina financial contributions, it strengthens the position of Fidesz in Hungary. The model appears to be to pump money into the Hungarian banks, which is probably a form of money laundering. People here in Vojvodina have mixed feelings about the Hungarian state and this development.[843]

The Prosperitati Foundation has also been criticised for lacking transparency, as 'the [Prosperitati] Foundation is classified as a Hungarian NGO, so it does not legally have to publish accounts. [It is an example of] trans-territorial money laundering at [the] state level.'[844]

The Hungarian government also invested significantly in Ukraine and resulted in controversy and inter-state disputes between Hungary and Ukraine.

> When the war started, the economic situation was bad, and people began to leave the country. Some stayed Hungarians particularly. The Hungarian state helps them. ... This is a grant programme, so you have to write a tender to get the money. You are eligible if you are in a Hungarian school, in [the] Hungarian language, teach Hungarian people. Medical people also get this. ... The first is cultural—teachers, medical workers, those who work at the libraries and so on. The second one is up to 15,000 dollars for those with their own business. The third one is for tourism. ... This help is just to stop the teacher from moving out ... The same for doctors. ... The Ukrainian state still think this is an example of separatism. They opened a criminal case against the Egan fund.[845] ... Unfortunately, the Ukrainian state does not finance national organisations. So there are some programmes from Hungary, that provide grants and finance programmes. ... There was another fund to help local Hungarians in Transcarpathia. It was designed for Transcarpathia, for Kindergartens, renovating and building new ones, ninety entities. It is not only for Hungarians but for everybody. Hungary will not take these buildings away to Hungary; it was and is for locals. Still, some Ukrainian officials think this is separatism. ... Istvan Dresege, who organises this programme, was not allowed to enter Ukraine, on the grounds that he was the person responsible for humanitarian projects in Transcarpathia and the region bordering Hungary. For the Ukrainian officials, this was separatism, as it was two regions that were united under one title, but I do not see this. The conflict was solved after his title was changed.[846]

In Ukraine, the Hungarian state's funding is controversial as the Hungarian state is perceived to be extending its reach beyond territorial borders. 'The Hungarian state is paying part of the

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[843] Personal interview with Norbert Šinković, political journalist in Novi Sad, Serbia on 30 May 2017. See Interview_ID_45_Norbert_Šinković at https://reshare.ukdataservice.ac.uk/854598/
[844] Ibid.
[845] The Egan Foundation is a fund created by the Hungarian authorities to assist Hungarian businesses in Zakarpattia, Ukraine. Between 2016 and 2018, the fund allocated 104 million euros to 124 Hungarian businesses in the region. Aleksei Arunyan, "How Hungary and Ukraine Fell out over a Passport Scandal," Open Democracy, https://www.opendemocracy.net/en/odr/how-kyiv-and-budapest-fell-out-over-zakarpattya/.
[846] Interview with Darsci Karolina - KMKSZ's Political and Communication Secretary, in Uzhhorod Ukraine on 21 May 2019. See Interview_ID_14_Darsci_Karolina at https://reshare.ukdataservice.ac.uk/854598/

wages of the professors, of the physicians, healthcare staff and so on - even repairing roads.'[847] With some suggesting, this can be perceived as Hungary being more present than the Ukrainian state to the Hungarians living in Ukraine.

> In Ukraine and Serbia, we are financing economic development programmes that attempt to stabilise these regions, but the situation is very bad in Ukraine. We have got to a point where the Hungarian government is directly subsidising the salaries of nurses, teachers, doctors, even public officials! These people have more interaction with Hungary than they do with Ukraine![848]

Significantly, in order for Ukrainian Hungarians to receive any financial help, it is necessary to complete Hungarian naturalisation.

> The Hungarian government allocated 2.5 billion forints, of help to Transcarpathia to these segments, especially to slow at least a bit, labour migration. ... In order for more people, especially, Hungarian people, to stay here, the money goes into medical centres and schools which have not had any renovation in ten to fifteen years. Now they are doing better, and they provide better services, which allows people to stay and to have their service locally and to not get them in Hungary, which would be the case otherwise. ... There are two ways to get the money. First, you need to have a passport of a Hungarian citizen. Second, you need to have a document which proves you are a foreign Hungarian.[849]

It has been suggested that Ukrainian institutions cannot maintain the same level of investment with the Hungarian funds. 'The financing from the Hungarian state is so significant, the budget of this institution is greater than some major Ukrainian universities.'[850] The Governor of Zakarpattia expressed his concerns with this Hungarian spending in his region.

> For every professional government in this country, it [Hungary's spending in Zakarpattia] should be a problem because they are spending more than we are on our own soil. That is the problem. Basically, they are colonising the territory. They are colonising it very rapidly. We need to gain back the control, and it will cost us a lot. Not just financially. ... There are not enough of them to start some strong political moves,

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[847] Personal interview with István Székely researcher at the Romanian Institute for Research on National Minorities in Cluj-Napoca, Romania on 27 May 2019. See Interview_ID_19_István_Székely_&_Tamás_Kiss at https://reshare.ukdataservice.ac.uk/854598/
[848] Personal interview with Mr Balázs Orbán, Director of Research Századvég School of Politics Foundation and advisor to Fidesz, in Budapest, Hungary on 25 May 2017. See Interview_ID_37_Balázs_Orbán at https://reshare.ukdataservice.ac.uk/854598/
[849] Personal interview with Laszlo Zubanych - UDMSZ Berehove in Berehove, Ukraine on 22 May 2019. See Interview_ID_15_Laszlo_Zubanych at https://reshare.ukdataservice.ac.uk/854598/
[850] Ibid.

> which Hungary will be able to use for territorial claims or for something really dramatic. So Ukraine should pay attention to try to change this situation.[851]

Somewhat controversially, despite being eligible for Hungarian funding, the Roma community in Ukraine who were naturalised by the Hungarian state have been excluded from these economic programmes.

> If they [Magyars in Ukraine] start a business, they get 10,000 euros from the start. It is often not for the Roma. They also have Hungarian passports, but they do not take part in this programme. Maybe 10 per cent.[852]

In Slovakia, despite plans to extend the funding channels into the country, there has been little success. 'The Hungarian government would like to appear as if it was a major player in the lives of Hungarians in Slovakia, but in reality, it has very limited influence overall, especially economically.'[853] With many local stakeholders expressing doubt with regards to the intentions. 'I doubt that it [the Prosperitati Foundation] will systematic and will probably involve some clientelism aiming to strengthen ties with those loyal to Fidesz.'[854]

Territorial expansion?

Although it cannot be proven that Hungary maintains irredentist intentions and is not part of the argument that extraterritorial naturalisations are conducted strategically, some interviewed do not entirely rule it out but suggest the current situation may replace the need or desire for territorial expansion. 'The mindset of the current Hungarian government is: if a change of

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[851] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine in Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/

[852] Personal interview with Myroslav Horvat - Deputy City Council Uzhhorod in Uzhhorod, Ukraine on 21 May 2019. See Interview_ID_13_Myroslav_Horvat at https://reshare.ukdataservice.ac.uk/854598/

[853] Personal online video interview with Dr Janos Fiala on 3 May 2017. See Interview_ID_29_Janos_Fiala at https://reshare.ukdataservice.ac.uk/854598/

[854] Personal interview with Géza Tokár, Spokesperson of the Roundtable of Hungarians in Slovakia, in Budapest, Hungary on 25 May 2017. See Interview_ID_48_Géza_Tokár at https://reshare.ukdataservice.ac.uk/854598/

borders is not possible, the next best alternative is to make them our citizens.'[855] Others suggest that current systemic factors, namely Hungary's EU and NATO membership, prevent such action. 'Putin is unpredictable. Orbán is more or less predictable. They are an EU member, a NATO member ... it is a different story.'[856] The Governor of Zakarpattia also pointed to the superstructures that inhibit irredentist action.

> Hungary is a small state inside the EU and NATO, and theoretically, they do not allow any thinking about changing the borders. The second thing, this is a pretty small country with a small army, and their armed forces cannot even be compared to the armed forces of Ukraine by strength. You have to divide political statements and political actions.[857]

Bohdan Yaremenko, the Foreign Policy Advisor to President Zelensky of Ukraine, suggests that Ukraine would be ready for any escalation in irredentist activities, arguing that there is a larger issue at stake.

> I still consider they [Hungary] do not have enough to fight against us, the military, so it is a limited threat. I believe that the largest threat he is presenting is the threat of undermining the values of democracy and the rule of law; this is threatening to undermine European unity within NATO.[858]

Others have suggested that Hungary's apparent pursuit of influence beyond its borders is irrelevant.

> I do not see where Hungary could use this influence, or make use of this influence, as both countries are members of the EU, both countries are members of the North Atlantic alliance, and Romania is twice as large as Hungary.[859]

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[855] Personal interview with Interview with Professor Tibor Varády, Central European University in Budapest, Hungary on 18 May 2017. See Interview_ID_36_Tibor_Varady at https://reshare.ukdataservice.ac.uk/854598/
[856] Personal Interview with Yaroslav Halas - Governor of Zakarpattia in Uzhhorod, Ukraine on 22 May 2019. See Interview_ID_16_Yaroslav_Halas at https://reshare.ukdataservice.ac.uk/854598/
[857] Ibid.
[858] Personal interview with Bohdan Yaremenko, Foreign Policy Advisor to President Zelensky of Ukraine In Kyiv, Ukraine on 7 June 2019. See Interview_ID_18_Bohdan_Yaremenko at https://reshare.ukdataservice.ac.uk/854598/
[859] Personal interview with István Székely – Executive Vice President of RMDSZ in Cluj-Napoca on 27 May 2019. See Interview_ID_20_István_Székely at https://reshare.ukdataservice.ac.uk/854598/

Conclusion

The argument forwarded by the Hungarian government that Hungary conducted extraterritorial naturalisations purely as a symbolic means to reify emotional links with their external kin or co-ethnics is more persuasive than it is for the Russian Federation; this is partly because the vast majority, but not all, of those who were naturalised by the Hungarian state, are ethnically Hungarian. Moreover, privileging a co-ethnic group is ideologically consistent with a nationalist party such as Fidesz. However, there are numerous aspects of the practice that allude to strategic intent. The Hungarian government have framed the Hungarians living abroad as a resource, both in public discourse and during interviews for this thesis. This resource is somewhat ambiguous but has variously been taken to mean an economic resource, political resource and demographic resource. The Hungarian state has been able to utilise this resource through naturalisation, thereby legally incorporating these individuals into the Hungarian state. Therefore, Hungary and Fidesz have made strategic gains from conducting extraterritorial naturalisations in their contiguous states predominately at the domestic level. However, they have also made international gains as their internal power consolidation provides relative power gains against their contiguous state and within the EU.

The extraterritorial naturalisations conducted by Hungary may not be well received by the 'home states' in which they are conducted, but given they are not illegal,[860] little can be done to prevent them, without modifying domestic legislation.

> This [the extraterritorial naturalisations] is a problem [from the perspective of the Ukrainian state], but it is not one you can stop. ... Those that get this help are mainly ethnic Hungarians. To do something to prevent this would not be right from the

[860] Even within Slovakia, extraterritorial naturalisations are not illegal from the perspective of the Hungarian state, despite legislation prohibiting in Slovakian citizens accepting a citizenship from another state

Ukrainian side. It would be better for the official support for Zakarpattia to come from Kyiv, and it needs this support as it is not a profitable region at this moment.[861]

[861] Personal Interview with Yaroslav Halas - Governor of Zakarpattia in Uzhhorod, Ukraine on 22 May 2019. See Interview_ID_16_Yaroslav_Halas at https://reshare.ukdataservice.ac.uk/854598/

Conclusion

This thesis is an original attempt at demonstrating how a state's domestic citizenship legislation can be utilised as a strategic foreign policy tool, specifically focussing on the practice of collective extraterritorial naturalisations, which can metaphorically be considered as an 'annexation of populations'. It has addressed a gap in the International Relations literature in linking citizenship policy with its impact on inter-state relations. Through a rigorous and thorough examination of the Russian and Hungarian cases of extraterritorial naturalisations, this thesis has shown that these two states made strategic gains on two levels, domestically and internationally. Internationally, the strategic gains include: 1) ethnic political party partner relationship building in the 'home states', which in turn facilitate other power generation attempts; 2) destabilising international rivals through the following mechanisms: a) generating a 'fifth-column' network to subvert or destabilise the 'home state', b) freezing conflicts, so the 'home states' are unable to join adversarial institutions, 3) a display of power, strength, and capabilities, and 4) Irredentism. Domestically, strategic gains include: 1) attempts to reverse demographic decline through facilitating immigration, and therefore increasing potential workforce and taxation revenues, 2) an increase in eligible and loyal voters that results in domestic power consolidation, facilitated by ethnic political party partners, 3) a display of strength that helps reinforce domestic leader perception, and 4) a show of support for the nation and co-nationals that generates support by the nationalist domestic public.

These findings will be of interest to scholars of International Relations. They highlight how identity politics and concepts most closely aligned with constructivism's interests have been used to generate power, a foundational realm of realism in International Relations. The examination of the practice has shown how contested concepts such as territorial and popular sovereignty remain in tension as the boundaries of the nation and the state rarely overlap. The

conceptual, legal and theoretical framework developed for this thesis enabled an exploration of the notion of citizenship and the nation and has shown how a difference in interpretation of these concepts by states, creates differences in the manifestation of policies which determine who is within, and who is outside, of the state polity. The thesis has also highlighted the inadequacies of international law in preventing strategic extraterritorial naturalisations, even in cases where deliberate destabilisation is the overarching objective.

The thesis placed extraterritorial naturalisations in their historical context; this enabled differentiation between previous instances of extraterritorial naturalisations which were benign, unprovocative, and non-contiguous – for instance, Italy in Latin America, Ireland in the US, and Germany in Kazakhstan, against the cases examined in this thesis, which have been conducted in contiguous states with strategic intent.

In analysing the literature on strategy, this thesis has conceptualised the term 'strategy' and showed how its ubiquity had created complexity in a plethora of diverse fields. It is taken that strategy contains the following elements: 1) top-down initiated holistic plan; 2) is long term in nature; 3) with a definable adversary or adversaries, and 4) involves an attempt to generate power.

Reassessing the findings

This thesis used a qualitative research design involving an analysis of the changes to the legislation pertaining to permitting extraterritorial naturalisations and fifty-two in-depth interviews with politicians and policymakers in Estonia, Latvia, Lithuania, Ukraine, Georgia, Hungary, Romania, Serbia, and Slovakia. Using Python to conduct a 'web scape' of publicly available official statements from the Russian President's Office and the Hungarian Prime Minister's office I analysed thousands of speech transcripts using NVivo 12 qualitative data management software by searching these documents for relevant statements.

This thesis showed that the extraterritorial naturalisations conducted by Hungary and Russia involved a process whereby states signal their strategic intent to engage with and naturalise external populations, implement the necessary changes to the citizenship legislation to permit the enactment of this policy and naturalise the target population. It has been argued throughout this thesis that the official positions of the two naturalising states, that extraterritorial naturalisations by Russia and Hungary are conducted to privilege a co-ethnic grouping is insufficient at explaining the practice. Moreover, it is argued that the practice has been conducted instrumentally, as a means to make absolute and relative strategic gains. Both Russia and Hungary have partly financed the extraterritorial naturalisations out of state defence budgets.

The extraterritorial naturalisations are coupled with a rhetorical device from state officials which justify policies aimed at external populations as a means to rectify feelings of resentment caused by losses to territory or empire disintegration instigated by external enemies. The creation of external enemies is a component of regime stabilisation efforts by authoritarian regimes.

Although there might appear to be contradictions in the strategy, it is argued that there are multiple strategies, targeting different segments of a varied population, that exist under the overarching strategy; this is particularly relevant to the two apparently competing state objectives of maintaining a naturalised population on the territory on which they were naturalised while wishing to attract the naturalised population to the naturalising state. In other words, the naturalising state does not view each of those it naturalises as being of equal comparable strategic benefit across each area of the strategy.

Table 8 below provides a breakdown of the impact of Russia and Hungary's extraterritorial naturalisation practices within each 'home state' by addressing each observable type of strategic gain across each sub-case relevant to the practice.

Table 8. The impact of extraterritorial naturalisations across each sub-case

	Russia				Hungary			
	Baltic States	**Georgia**	**Moldova**	**Ukraine**	**Romania**	**Serbia**	**Slovakia**	**Ukraine**
Clandestine extraterritorial naturalisation process?	Yes	No	Yes	Yes, in Crimea before the annexation. No in Donbas.	No	No	Yes	Yes
Alliance blocking and freezing conflicts	No	Yes	Yes	Yes	No	No	No	No
Creation of 'Fifth Column'	Yes	Yes	No	Yes	No	No	No	No
Addressing demographic decline	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
Display of power	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Irredentism	No	Maybe	No	Yes	No	No	No	No
Increasing votes	No	No	No	Yes	Yes	Yes	Yes	Yes
Ethnic political party partner relations building	Yes	No	No	No	Yes	Yes	Yes	Yes
Economic benefits	No	No	No	No	Yes	Yes	No	Yes

Russia

The extraterritorial naturalisations conducted by Russia, sometimes known as passportization, were conducted clandestinely in the Baltic states, Transnistria, and Crimea before the Peninsula's annexation. In Abkhazia and South Ossetia in Georgia, and Donbas in Ukraine, however, the practice has been conducted more overtly. For the Russian Federation, within the Baltic states of Estonia and Latvia, there have been relatively limited strategic gains made by conducted extraterritorial naturalisations. However, by naturalising ethnic Russians in these territories, they facilitated creating a 'fifth column' that attempts to destabilise these

states; this is important to Russia given that these two states are EU and NATO members and are effectively Russia's direct rivals. The extraterritorial naturalisations within the Baltic states have also allowed the Russian Federation to foster closer partnership relationships with ethnic political parties, some of which have power within the European Parliament or domestic parliaments.

By conducting extraterritorial naturalisations, Russia has created a situation which potentially addresses a demographic decline by drawing on the recently naturalised Russian citizens in the Baltic states, Ukraine, Moldova, and Georgia as these citizens are free to emigrate to the Russian Federation to live and work.

Extraterritorial naturalisations have been vital in prolonging or exacerbating international conflicts in Georgia and Ukraine, creating a situation where these states remain in frozen conflicts and cannot foster alliances with Russia's rivals in NATO and the EU – a key foreign policy goal of the Russian Federation. Across all of the sub-cases, the extraterritorial naturalisations can be interpreted as a display of Russian soft power. In Ukraine and Georgia, it can be argued that the extraterritorial naturalisations have been a precursor for irredentist motives, particularly within Crimea prior to the annexation. It is improbable, but not impossible that the Russian Federation intends to formally annex Abkhazia or South Ossetia; however, their control over these regions is significant. The extraterritorial naturalisations by Russia may have also increased domestic popular support for the incumbent regimes, while also directly increasing the number of eligible voters for Russian presidential elections in Crimea, Ukraine and Abkhazia, Georgia. There are very few potential economic benefits of extraterritorial naturalisations to the Russian state; in fact, these are likely to be expensive.

Hungary

The extraterritorial naturalisations conducted by Hungary were conducted clandestinely in Slovakia, where dual citizenship was pre-emptively prohibited and in Ukraine where dual citizenship is not illegal, but where there are no provisions within the Ukrainian constitution for dual citizenship. In Romania and Serbia, the process was conducted more openly.

The lack of open extraterritorial naturalisations within Slovakia has drastically limited the numbers of those conferred with Hungarian citizenship. Moreover, many of the tangible instrumental benefits that a Hungarian passport brings to citizens of non-EU states Ukraine and Serbia do not apply to Slovakia. In EU member Romania, dual citizenship was not prohibited and as such, large scale naturalisations occurred.

The Hungarian state has attempted to attract emigrants from Ukraine and Serbia by offering targeted populations with Hungarian citizenship. However, it is debatable whether this has been successful, as the emigration has occurred from these regions, but not necessarily to Hungary.

The Hungarian government, Fidesz, have made significant transnational electoral gains through the extraterritorial naturalisations in their neighbouring territories. The number of individuals eligible to vote in Hungarian parliamentary elections and referenda has increased by approximately one million, resulting in a power consolidation effect for the incumbent government. Fidesz has also managed to use extraterritorial naturalisations to create close political alliances with ethnic political parties in each of these states. This political party network has been utilised in a two-way dynamic during electoral campaigns to the benefit of Viktor Orbán and Fidesz and their principal partners. Moreover, these parties have created an economic resource for the Hungarian state as the recently naturalised act as intermediaries facilitating Hungarian state investment in the territories on which they conduct extraterritorial naturalisations.

While some of these strategies might appear to be contradictory – it is argued that these are not contradictions in strategy but are examples of multiple strategies aimed at different segments of the naturalised population. In other words, while the Hungarian state intends for some people to stay where they are, they are also simultaneously attracting a younger, fertile, working population to Hungary.

Theoretical implications

The extraterritorial naturalisations conducted by Russia and Hungary are a manifestation of identity politics. Indeed, these states justify the practice by suggesting that the states have a responsibility to 'their' external citizens and the conferral of state citizenship is a tangible element to this relationship. Accordingly, these practices reify and reinforce state citizenship membership boundaries from the top-down, as pre-requisites for group membership in various forms including linguistic criteria, ancestry, and territory of birth and residence are shifted to include or exclude specific segments of the population. This top-down initiated alteration in the regulations about who ought to be considered a citizen is not novel. States frequently change legislation which affects the eligibility of citizens' children, immigrants, or descendants and ancestors of citizens. Likewise, naturalisation requirements are continually altered that affect both the process and eligibility for the individual. The extraterritorial naturalisations can be seen as a lens through which to see how identities are constructed through legal and institutional instruments and how states can instantaneously decide who is in, and who is out, of the state membership group. However, the buy-in required for this practice to operate successfully means that this decision is not always unilateral; those who are naturalised, in most cases explored in this thesis, do so out of choice. There may be some form of structural coercion informing this decision, given that the incentivised naturalisation process offers tangible rewards to members of a community, meaning the relative costs for

rejecting citizenship thus remove any real choice for the individuals but to accept citizenship in order to maintain their relative position vis-à-vis their community.

The political construction of identity usually is a topic of interest for constructivists in International Relations. However, extraterritorial naturalisations provide a novel lens through which to view these dynamics. Additionally, the practice's strategic gains and the decision-making process about implementation ultimately involve questions of power and aspect of the phenomenon will concern scholars of International Relations interested in realism manifestations.

Extraterritorial naturalisation as a state practice will also interest those concerned with international laws and norms' effectiveness. It is considered by some to be illegal regarding violations of sovereign territorial integrity of the states on which they conduct the practice; however, international courts do not have the capacity or legitimacy to intervene to prevent it. Moreover, it remains a state's prerogative to naturalise whomever it wishes.

The practice also brings to the critical conceptual tenets of International Relations, sovereignty and jurisdiction. Although this thesis does not claim that extraterritorial naturalisations conducted by Russia and Hungary expand their territorial sovereignty over another state's territory, this thesis has shown that in addition to the position that states impacted by these practices have deemed them to be a violation of their territorial integrity, the practices also create overlapping loyalties between populations and states. Therefore, at the very least, the practice adds to the complicated dynamic between the naturalising state, the 'home states', and the populations.

The annexation of populations

Earlier on in this thesis, the metaphor the 'annexation of populations' for the extraterritorial naturalisations conducted by Russia and Hungary was introduced; this is not an argument that

these practices amount to a legal annexation of the territory on which the populations inhabit. It is also not a suggestion that the practices are always a precursor to legal territorial annexation (although in Crimea this argument could be made). However, the metaphor is pertinent because it draws on the commonly accepted linkages between annexation and territory. For the two states examined in this thesis, Russia and Hungary, territory is fundamental to extraterritorial naturalisation and has informed strategic decision-making processes about where, and where not to conduct the practice. It is not, therefore, an example of aterritorial naturalisation. The populations these states naturalise are under the legal territorial sovereignty of another state. Domestic legislation of the state on which the naturalised population reside has affected the naturalising states' ability to conduct extraterritorial naturalisations. Territory, like its inhabitants, is not all of equal utility to the naturalising state and it partly explains variance in the utilisation of the practice. However, unlike territorial annexation, the extraterritorial naturalisations or popular annexation are not absolute, in that two states can have legitimate uncontested claims to the same group of individuals. The use of the metaphor also benefits from distinguishing these two cases of extraterritorial naturalisations from other benign, non-contiguous, not-strategic instances such as the Irish and the naturalisation of their descendants.

Scope conditions

The research involved for this thesis used a case selection on the dependent variable: states which have conducted extraterritorial naturalisations in their contiguous states. It was not the project's aim to create generalisable theories applicable to a broader universe of cases. This thesis has instead explored the processes and mechanisms involved in the Russian and Hungarian practices to answer the questions about the motivation these two states had in pursuing these policies. By providing an assessment of the causal mechanisms involved in the

decision-making process for extraterritorial naturalisation policies, selecting cases on the dependent variable is defensible as parsimony was not the objective. Instead, the focus was on the causal influences for the bounded set of cases. This thesis provided an account of the two states' extraterritorial naturalisation practices, which as defensible as a legitimate social scientific enquiry, as according to Gerring 'accounts refer to any analysis of an event or set of events with no explicit attempt to generalize beyond the specifics of a particular case.'[862] It was not an attempt to build theory nor test a theory that might apply to a set of cases not examined in this thesis. There is no attempt at general theorisation since there is no claim for generalisability. The thesis is an effort to unpick two states' power political practices in the context of external populations and pose questions about how these practices impact key concepts, notions, and theories relevant to International Relations scholars. The argument that extraterritorial naturalisations by Russia and Hungary have produced strategic gains might not hold for other states with other geographies, histories or in different contexts. The extraterritorial naturalisations by Russia and Hungary operate within a logic informed by relatively unique historical context, namely the existence of population beyond their state borders with whom they have a pre-existing relationship. This situation and circumstance do not exist for all states. Therefore the universe of cases is bound to a certain degree by these antecedent conditions that make the Russian and Hungarian cases similar to each other, yet unique from others.

(Foreign) policy recommendations

It is beyond the scope of this thesis to provide policy recommendations to specific governments. However, the argument and findings put forward in this thesis suggest that from

[862] Gerring, "Mere Description," 725.

the perspective of the state, states who are concerned about the legality and implications of extraterritorial naturalisations occurring within their sovereign territorial borders can mitigate the impact of these practices by implementing domestic legislation that explicitly prohibits their citizens from becoming dual citizens with another state. For instance, Slovakia largely mitigated the perceived negative impact of Hungarian extraterritorial naturalisations by immediately implementing counter legislation to that effect. Conversely, many of those in Ukraine who were interviewed for this thesis were anecdotally at least under the impression that dual citizenship within their country was explicitly illegal – this is not the case; within the Ukrainian constitution, there is simply no provision made for dual citizenship. From the individual's perspective, prohibiting citizens' right to receive citizenship from another state is likely to be seen by some as restricting individual liberties. However, there are liberal democratic states like the Netherlands, who are sceptical about the benefits of dual citizenship and have therefore implemented legislation restricting the practice.

Recommendations for future research

This thesis primarily addressed a top-down initiated policy and the effect on inter-state macro relations of those involved. Further research aimed at looking at the micro implications, perhaps from a sociological or anthropological perspective, might address questions relating to the bottom-up changes these naturalisations bring to the individuals and communities involved from within the naturalising states and those in the 'home states'. This perspective could also provide better insight into individuals' perspective on the naturalisation process, and the loyalties felt between them and the naturalising states or the 'home state'. Further research projects looking at the relationship between the naturalised population and existing population and the relationship between the naturalised population and others residing in the territory of the 'home states', would provide valuable insight into the phenomenon as a whole.

Although this thesis has not attempted to generate any theory relating to the generalisable state use of extraterritorial naturalisations, future research on the topic may help formulate theories relating to the use of external populations to interstate power dynamics. Further research on power generation efforts from other diaspora engagement policies might provide valuable insight into how populations, especially external populations, might be seen as a resource for power generation.

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