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Why Multilingualism and Multilingual Communication Jeopardize a Common Social Policy for Europe[1]

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Abstract. This paper studies the consequences of European multilingualism and multilingual communication for a common social policy in the Europe Union. In the past fifty years, the main focus of the Europeanization project has been on financial-economic developments and less on a common social policy. Even today, there is no common framework for social protection in the European Union. Common minimum income or wages for European citizens are lacking. In this paper, it will be argued that the lack of social protection has to do with Europe's linguistic diversity. Language is seen as a building block of national communities and their political cultures. The European integration project can only continue if different European political cultures are shared. However, due to the fact that a neutral lingua franca is lacking, this has been unsuccessful so far. The interaction of social groups that have a different language repertoire with the structures of multilevel governance are responsible for the fact that some of these social groups, including the 'Eurostars', and national cosmopolitans benefit from social protection, whereas other groups lacking relevant language skills, such as anti-establishment forces, commoners, and migrants, are excluded from the European power domains. These power configurations can be fruitfully studied in the floral figuration model. Consequently, due to these patterns of inclusion and exclusion, true solidarity among European citizens is not within reach. These claims will be illustrated by a case study on the Netherlands, a country that has been pursuing neoliberal policies counterbalancing Eurozone and economic crises and is trying to assimilate migrants and other newcomers. Apart from assimilatory policies targeting migrants, language games used by competing forces are playing an important role in the discourse in order to set up power structures.

Keywords: multilingualism, multilevel governance, Social Europe, floral figuration model, migrants, language games

Introduction

Commentators recognize that there is a close relation between politics, language, and solidarity at the level of national political cultures. According to Bo Rothstein (1998), although not being completely convinced of the role political cultures play concerning solidarity, social protection is conditioned by the perception of reciprocity. Reciprocity is, however, best guaranteed in a system of bounding and bonding, as outlined in Ferrera (2005). According to Maurizio Ferrera, social protection has always been dependent on two social mechanisms: first, the bounding of a territory, nation-state borders and, second, bonding, the creation of a bond of solidarity or sharing within the boundaries of the national community, which may temporarily include immigrants and relies on factors such as territory, nationality, residence, language, citizenship, and a sense of belonging to community. Note that among the factors inducing solidarity Ferrera refers to language as well. One of the key points of the relation between social protection and bounding/bonding lies in individual and collective willingness to share resources within a given political community. Although this position considers the relation between politics and language to be relevant for solidarity at the national level, this relation is seriously underestimated and neglected in research in the context of Europeanization. In a recent work on 'Social Policy in the European Union' published in the prestigious 'The European Union Series' by Karen Anderson (Anderson 2015), the term 'language' does not even appear.

Even Philippe Van Parijs, the advocate of turning international English into a global lingua franca in order to solve the problem of linguistic diversity and multilingual communication in Europe and the world, admits that a common language is a prerequisite for forming a demos, i.e. a nation-state in the sense of Ferrera, and that this demos is an important precondition for economic solidarity at a local level (Van Parijs 2011: 195). Hence, local solidarity is covered in the framework of Van Parijs, but solidarity on a European level is left in limbo. However, solidarity even within the context of the nation-state including a demos based on a common language remains a difficult matter, as Jeene et al. point out (Jeene et al. 2014). Dutch deservingness opinions fluctuate continuously depending on economic and political factors such as GDP, unemployment rate, and the national political climate. However, note that notions as 'demos', 'nation-state', 'national community', and so on are tied to the notion of 'national political culture', which is the relevant notion for analysis concerning social Europe, as it is convincingly argued in Barbier (2013).

According to Barbier (2013: 105), the concept of national political culture is inscribed in a given political community as a system of meanings embedded in history through collective practices, which are more or less formally institutionalized and support common representations of what is valued. This

means that the pairing of language and politics is rooted in a network of common meanings conditioning political activity that generate their own discourses and cognitive frames. As a consequence, there is an individual and collective willingness to share resources within a given political community. European integration, including a common policy for Social Europe, would mean the sharing of political cultures for which a common multilingual political idiom will be required. However, if a common administrative language is a building block for solidarity, it is hard to imagine how a social policy at the European level could be realized when a common language or communication patterns including the European citizen are absent. For now, this is the present state of affairs since linguistic diversity is considered a cornerstone of European identity. This has led Wang and Steiner (2015) to reject the concept of linguistic diversity altogether, favouring homogeneous language communities. These authors argue that there is a relationship between linguistic fragmentation and social capital where the latter is characterized by trust, common norms, and networks. Countries with higher social capital tend to be richer. According to them, the number of languages in a country is significantly negatively correlated with social capital. This claim is not absolute, however. There can be more different languages spoken in a country, but important is how many citizens speak the same first language. The higher the number of citizens that speak the same first language, the more linguistic homogeneity there is, the better it is for social capital. Wang and Steiner point out that there are countries with high rates of social capital that are not linguistically homogeneous, such as Belgium and Canada. This can be explained by the fact that on the sub-state level, Flemish and Québécois national identity formation, including an independent language, are intertwining with social policy. However, introducing homogeneous linguistic communities at the European level causes patterns of exclusion, widening the gap between the European elites and the commoners, actually undermining Social Europe, as I will demonstrate below. From these introductory remarks, it is clear that language and communication are relevant for the design of a European social policy and that there is no a priori reason to avoid the role of languages and multilingual communication in research questions on this topic. It is precisely the neglect of the European multilingual structure that has caused the delay in the development of a social policy for Europe in the past fifty years, not guaranteeing fundamental files of social protection such as the minimum income or minimum wages for all European citizens.

Apart from Europe's multilingual identity, there is another, structural factor that is relevant for an analysis of the relation between European multilingualism and a social policy for Europe, i.e. the concept of multilevel governance within the European Union. Multilevel governance is an administrative system in which power is distributed and shared horizontally and vertically among many different levels of government, from the supranational to the local, with considerable

interaction among the parts (see McCormick 2015: 32). With reference to the Union, the different levels are normally described as a tripartite system consisting of the 'macro'-level, i.e. the supranational EU-level, a 'meso'-level, i.e. the level of the Member States, and a 'micro'-level, i.e. the local level of government and policy-making (Hooghe–Marks 2001). This paper will investigate the relation between languages, multilingual communication, and social policy in Europe; more precisely, it offers an analysis of the present state of affairs, which is the result of the interplay of Europe's system of multilevel governance and its multilingual identity.

The question is how multilingualism and multilingual communication in Europe fit into the system of multilevel governance? For this purpose, I will adopt the floral figuration model for languages that has been proposed in De Swaan (1988) (see *Figure 1*). This model depicts the language competence of social groups and their hierarchical orderings in terms of power (Bourdieu 1991). Although De Swaan introduced the floral figuration model to track down the socio-political implications of linguistic relations at the national level, it is my conviction that his model can be used as a fruitful analytical frame for European Union purposes as well. The floral figuration model also gives insight into the position of international English, as I will discuss in this paper. International English is functioning more and more as a bridging language, a lingua franca in the European institutions in Brussels.
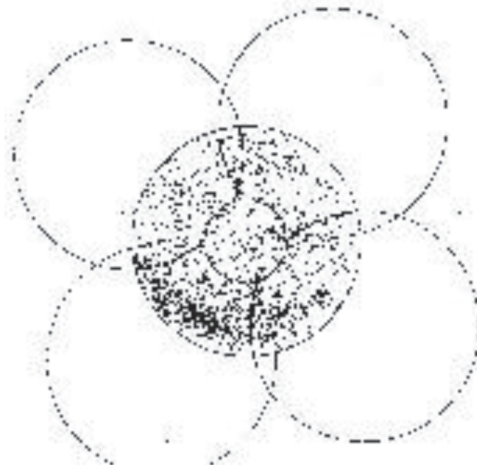

Figure 1. *The floral figuration for linguistic actors in the European Union*

This model will be empirically also tested in a case study on multilingualism and multilingual communication in the Netherlands. The Dutch government responded to the Eurozone crisis by introducing a neoliberal welfare policy and an assimilatory policy towards migrants. These policies had repercussions in

the field of multiculturalism and multilingual communication, as I will discuss below. These repercussions unambiguously involve patterns of exclusion affecting linguistic actors. Hence, these patterns seriously hamper the design of a social policy for Europe that should be based on patterns of inclusion rather than exclusion. Hence the conclusion that languages and multilingual communication will be relevant for the realization of Social Europe. Let us briefly introduce the floral figuration for linguistic actors in the European Union.

This figure depicts the language situation in the European Union. In the outer circles, the European masses, the commoners in Europe's Member States are located. The commoners speak a national or regional language as their mother tongue; they have received some sort of basic (elementary and secondary) education in their mother tongue and might speak a European language of wider communication such as English, Spanish, French, or German. If they do speak a language of wider communication, it is not the standardized variety of these languages. Rather it will be an 'anything goes' variety. The shaded area represents speakers who belong to the European multilingual elites and who have a much better control of their mother tongue and the European languages of wider communication than the commoners. Fligstein refers to them as '…the educated, owners of business, managers, and professionals, and the young' (Fligstein 2008: 156). These groups form in fact a 'class' and participate in transnational networks within Europe. Those in the core star are the European cosmopolitan elites, the Eurostars, as Adrian Favell calls them (Favell 2008: 144, 145). They use English as the European communication language. Merje Kuus, who interviewed a number of European diplomats in the European External Action Service, describes this operating language as 'a technical language of eurospeak' (Kuus 2014: 56). Note further that in the floral figuration model local speech communities are hardly intersecting with each other, but all of them are linked to multilingual local elites through the mediation of one central or national language. These local, regional, or national elites – I will refer to them as national cosmopolitans – are acting as interfaces between the commoners, who have basically monolingual language and communication skills, and the 'multilingual' Eurostars. 'Multilingual' means first and foremost 'this technical language of eurospeak', which is based on English and is functioning as a lingua franca. This adapted version of English in the Brussels institutions is sometimes also referred to as 'Euro-English'. Hence, the shaded area is communicating via Euro-English at the expense of the other official European languages, including standard British English. The floral figuration model depicted in *Figure 1* is not sophisticated enough to describe all the positions of relevant linguistic actors in Europe. My analysis in terms of this model is to be considered as a first approximation of the various interests that determine the sociological aspects of European linguistic diversity. I will leave the detailed elaboration of it, a flower with much more leaves, as a task for further research.

Four groups will be relevant in the discussion of the Dutch case study below, namely the national cosmopolitans, anti-establishment forces, commoners, and migrants. The national cosmopolitans determine the normative variety of the Dutch standard language, which allows them to include their own clientele and to exclude commoners and migrants not controlling the normative variety of Dutch. The former are included into the shaded areas; the latter are excluded from these. The anti-establishment forces who communicate in their vernacular with the commoners have quite often a poor command of English, whatever its variety. Hence, I exclude them from the shaded areas in *Figure 1*, although from a political point of view the Eurosceptics and Eurorejects are represented in the Brussels political arenas but not in the 'intermediate sphere' in the sense of Van Middelaar (2013), who has argued that there is an added 'European' value to the space of European cooperation. The Eurosceptics and Eurorejects are the 'populists' referred to by the European elites. The anti-establishment forces use and misuse the power of language when communicating with the local commoners in their vernacular and using a direct style and language games on sensitive issues such as the inclusion of internally mobile European citizens or immigrants from outside Europe and other newcomers; or when communicating on the Eurozone crisis that might endanger the national welfare state. The anti-establishment parties also communicate with the European elites, i.e. both with the Eurostars and the national cosmopolitans, but this communication is negative and exclusionist, directed at undermining European integration. The anti-establishment forces compete with the national cosmopolitans by using direct communication lines reaching out to the commoners in their common vernaculars. This pattern forces the national cosmopolitans to adapt to the language and rhetoric used by the Eurosceptics and to speak with a 'forked tongue' in order not to lose their electorate to these forces, as the Dutch case study will demonstrate. Migrants are in principle located in the unshaded, outer circles. If they adapt to the host situation and learn the host language, they will be able to communicate via the national cosmopolitans with Brussels. However, if migrants have a deficient control of the host language or its normative standard, they might face isolation, lacking a channel to communicate with Brussels, or discrimination on the labour market of the host country. Note that they have the possibility to open their own transnational network with peers in the other outer circles, an option commoners in the Member States hardly have. In sum, this set of exclusionist patterns that are depicted by the floral figuration model for language and communication cannot form a solid basis for Social Europe.

Languages and Multilingual Communication in Europe

From its founding treaty in 1958, Europe has stipulated that all the languages of the Member States are official languages. Language regulation 1/1958 turned four languages – official and regional languages in France, Germany, Italy, and the Benelux countries – into official European languages (Labrie 1994). These languages included French (France, Belgium, Luxemburg, and Italy), German (Germany, Belgium, Luxemburg, and Italy), Italian (Italy), and Dutch (the Netherlands, and Belgium). These four languages enjoyed an equal status in the institutions of the European Common Market, implying that they were to be used as institutional and working languages. With every new round of expansion, new Member States had the right to propose new official languages. The language regulation remained operative and all official languages of new Member States were recognized as official European languages. At present, the EU recognizes 24 official languages. Linguistic diversity in Brussels is hard to manage, however. Hence, the distinction between 'official' versus 'working' language has become relevant, and this is practically used as a solution for the language issue in the Brussels institutions. The difference between official and working languages is defined in Article 6 of the language regulation: the institutions are allowed to freely choose their own language regime. The European Commission acknowledges three working languages, namely English, which is used the most, French, and German. The latter is used substantially less frequently than the other two (Marácz–Rosello 2012). Another example of Article 6 is the fact that of the 15 Directorate Generals (DGs) only three use the 24 official languages on their website, including Employment, Social Affairs and Inclusion (EMPL), Enterprise and Industry (ENTR), and Justice (Just) (Gazzola 2014). All other DGs use a reduced or a monolingual regime consisting of English only.

There are voices to abolish Language Regulation 1/1958 altogether due to the fact that an equal treatment of official and working languages is not possible. The main argument is that the democratic language regime of the EU will hamper an efficient functioning of its institutions. Moreover, the reduction of the number of official languages is underpinned by the fact that international English functions practically as a lingua franca in Brussels and the European educational recommendations for languages favour the learning of English (Haselhuber 2012). Hence, monolingualism, i.e. the use of international English, is getting more and more the practice in Brussels. But not only the introduction of a variety of international English as a European lingua franca, let us say Euro-English, will hamper the equality of languages in Brussels. It will also render almost impossible the participation of non-speakers of English in the Europeanization project. Let us discuss this claim in more detail.

It is clear that English is on the rise as a global lingua franca. Phillipson (2006, 2009), De Swaan (2001), Grin (2014), and Ricento (2015) convincingly argue that

the expansion of English on a global scale is driven by the hegemonic political and economic positions established first by the British Empire and later on in the twentieth century by the United States. However, for a number of reasons, the situation of global English is not unproblematic. Firstly, the conclusion is justified that English is associated with linguistic hegemony and domination at the expense of other languages. Secondly, English cannot function as a real lingua franca that is a neutral mediator language respecting the linguistic background of all speakers involved in the communicative event due to the fact that it is spoken by native and non-native speakers. Thirdly, there are different versions of English in use, such as British English, American English, and so on, which makes it for the foreign speakers of English difficult to know what the precise norms of English are, although there exists a regularly accepted normative variety of English, standard British English, spread by important language mediators, such as BBC radio and television, and is taught to foreign speakers of English in formal education. So, the variety of global English functioning as a bridge language among non-natives should in fact be English-as-a-foreign language. However, it has been observed that this normative variety of English is not spoken across the globe but rather a basic version of English mixing, intermingling with and sampling local languages as an outcome of language use and communication (Edwards 2012: 34–38, Hülmbauer et al. 2008).

Let us remember that *Figure 1* depicts linguistic diversity in terms of a demarcation between European elites and commoners. The European elites, i.e. the Eurostars and the national cosmopolitans, although positioned in different geographical spaces, i.e. the Brussels centre and the Member States, are positioned in a common virtual space. They form a connected transnational class and speak the same sort of fluid language for instrumental communicative purposes only, i.e. a European variety of international English, i.e. Euro-English. Euro-English is developing its own characteristics, such as misused English words and expressions (European Court of Auditors 2013), and has adopted artificial expressions, e.g. from the financial world, such as 'collateralized debt obligations', 'asset-backed securities', and 'credit default swaps' (Maier 2014: 210). This is 'de-contextualized English' pinned down in Barbier (2014), or 'the technical language of eurospeak' Kuus (2014) is referring to. It is hard to imagine that this variety of English will be able to mediate between the different political cultures in Europe that are rooted in language, as Ferrera (2005) and Barbier (2013, 2014) argue for. However, whatever its status or quality, according to the last dataset of Eurobarometer (see Eurobarometer 386), roughly 50 percent of the EU citizens do not have any knowledge of English at all. So, a restricted linguistic regime with English or consisting of English-only would privilege the higher educated, the better-off in Europe, seriously undermining Social Europe (Gazzola 2014). Let us now turn to a case study of the Netherlands.

Dutch Responses to the Eurozone Crisis

The Netherlands has been one of the six founding countries of the common Europe and a strong proponent of the establishment of the single European market and the four cross-border freedoms in the EU (Van Middelaar 2013). Dutch mainstream political parties have been supporting the establishment of the single market in the Maastricht Treaty in order to profit optimally from a financial-economic policy that is based first and foremost on ever-increasing markets, trade, and export (Van Meurs et al. 2013). This massive mainstream support for transnational concepts, such as Europeanization and globalization, ties in with the classical Dutch state policy of 'mercantilism' and matches very well with the ideology of 'neoliberalism'.

Barbier (2013: 71) observes that the Netherlands does not fit into the classical typology of welfare states, elaborated in Esping-Andersen (1990), including the three types of liberal, conservative-corporatist, and social-democrat. The Netherlands is traditionally of the liberal type characterized by its genuine 'mercantile' spirit, but it has in due course adopted elements of the other two models as well. This has yielded a hybrid type of welfare state. Recently, under the pressure of the global neoliberal market forces, the liberal profile has gained the upper hand, though. A liberal policy is considered to be a recipe to solve the Eurozone crisis. In a neoliberal state, the state withdraws from the socio-economic domains, citizens are expected to become directly responsible for their own social welfare, and the state has no other obligation than facilitating its citizens to obtain more social welfare strictly limited to its territory. Due to this neoliberal policy, the Dutch lower and middle classes fear that they cannot rely any longer on the state for their social welfare and the traditional social protection. Although the neoliberal ideology has dominated thinking about the preservation of the social welfare state in the Netherlands, different responses to the challenges of Europeanization, globalization, and the ensuing Eurozone crisis have also appeared in recent times. Anti-establishment parties have successfully mobilized the fears among the Dutch electorate, especially since the outbreak of the Eurozone crisis in 2009, threatening that the Netherlands would leave the Eurozone in order to protect its own national welfare system. Furthermore, the absence of positive integration in the domain of migration policy has given anti-establishment parties an extensive electoral agenda (Scharpf 2010). In the traditional neighbourhoods of larger Dutch cities, the local commoners had to pay the price of worsening social services due to neoliberal state policy. In these neighbourhoods, social relations were already tense because of a massive influx of migrants, especially those with a different, non-Western European cultural background, not being absorbed and assimilated successfully.

In 2001–2002, on the waves of these social tensions, Dutch anti-establishment politician Pim Fortuyn succeeded in mobilizing large groups of commoners to strengthen Dutch national identity, to put a more restrictive migration policy and an anti-European stance on the political agenda. After Fortuyn's assassination in May 2002, his heritage was taken over by Geert Wilders, a liberal politician and former member of the VVD (People's Party for Freedom and Democracy), who established the PVV (Party for Freedom). The PVV has been successfully challenging the mainstream political parties with anti-establishment, strong anti-immigration, anti-Islamic, and Eurosceptic rhetoric. The party entered the Dutch Parliament in 2006 and doubled its mandates in the 2010 parliamentary elections. As an outcome of these elections, the party agreed to back a centre right-liberal minority government of liberals (VVD) and Christian democrats (CDA, the Call of Christian Democracy), resulting in the First Rutte cabinet. This cabinet had to step down, however, due to the fact that the PVV withdrew its support for new austerity measures. Since then, the relation between the PVV and the mainstream parties has cooled down because it has become clear that the PVV does not want to take any responsibility for electorally delicate measures. This has led to a clear division between the mainstream left-liberal parties and anti-establishment parties.

In fact, this political demarcation correlates with a societal demarcation, as has been observed in a recent study entitled 'Separate Worlds' (Boven et al. 2014). Boven et al., who conducted this research on behalf of the Netherlands Institute for Social Research (SCP) and the Scientific Council for Government Policy (WRR), have studied opposing socio-cultural values, including universalist versus particularistic opinion, global versus local orientation, integration versus demarcation, Europhile versus Eurosceptic stance, perspectives with conflicts versus perspectives without conflicts, reflexive versus direct communication style, trust in politics versus distrust in politics, social trust versus social distrust, and found that these values are correlating with higher and lower educated groups, respectively, in the Dutch society. Furthermore, they discovered that these values correlate with party preference, the former values being popular among the electorate of mainstream left-liberal parties, while the latter ones among the electorate of anti-establishment parties such as the PVV and its socialist counterpart Eurosceptic SP (Socialist Party).

With respect to the Dutch case, I will discuss two patterns of multilingual and communicative communication in the framework of the floral figuration model. The first pattern concentrates on the communication between the Brussels core and the Dutch commoners, which is mediated via the national cosmopolitans. I will demonstrate that it involves a pattern of exclusion. A second pattern of linguistic and communicative exclusion concerns the migrants in the Netherlands.

Forked-Tongue Speak

A key role is played by the national cosmopolitans, who are acting as an interface between the Brussels Eurostars and their peer commoners. Dutch Prime Minister Mark Rutte, representative of the liberal VVD, is a typical mainstream Dutch politician who has been in office since 2010. Between 2010 and 2012, together with the Christian democratic CDA backed by Wilders' PVV, he headed a centre-right minority government. Since 2012, Rutte has been in charge of a coalition government with the Dutch Labour Party PvdA. PM Rutte is an active player in the Brussels political arena, the intermediate sphere referred to above. Rutte and his liberal supporters, who can be classified as national cosmopolitans, are acting as interfaces between the Eurostars and the Dutch electorate, which has been growing more sympathetic to Euroscepticism over the years.

Rutte is generally viewed as a 'Janus-faced politician' and speaking with a 'forked tongue'. This means he is a Europhile in Brussels and a Eurosceptic in The Hague (De Bruijn 2012). His VVD party tries to sell this double position of the Dutch PM as a clever negotiation strategy: 'If you say in Brussels always yes, they will like you. If you say once in a while no, they take you serious[ly]. They take Mark serious[ly] in Europe' (De Bruijn 2012). The argument of Rutte's supporters is that a Eurosceptic attitude in Brussels is necessary to get a better negotiation position and to convince Dutch Eurosceptic voters that the South European countries will be financially supported in the end; but not at any price. The Dutch PM, who is aware of his Janus-faced position, is playing tactical language games in media performances. Rutte attended the European summit of 22–24 November 2012, where the Union's long-term budget and the Greek financial crisis were discussed, as he stated with 'a loaded gun in his pocket', but he quickly added that he would not use it, however: 'If you put it on the table, you put the negotiations under such a pressure that they will have no result' (Rutte 2012).

Due to the interface-like position of national cosmopolitan politicians, they are necessarily Janus-faced politicians, who speak with a forked tongue. Being part of the intermediate sphere in Brussels and at the same time participating in their home political arena, they send out their messages to different audiences simultaneously and address their electorate in a reflexive communication style (Bovens et al. 2014). Rutte's sentences are long and the topics are complicated. When he refers to his model of Social Europe as a 'participation society', he in fact implies the participation of every citizen in 'a complex network society' (Rutte 2013). A complex network society is understood here in the sense of Castells (Castells 2013, 2014), who argues that network society, the social structure that characterizes society in the early twenty-first century is constructed around digital networks of communication (Castells 2013: 4). However, such concepts are rather difficult to grasp for common citizens. Eurosceptics have a more

transparent position in the level playing field, which are the outer circles in the floral figuration model. Although they are present in the Brussels arena, they do not really participate in it, they are not part of the intermediate sphere where Brussels politics is made, and hence there is no need for 'doublespeak' (Pool–Grofman 1984). Anti-establishment politicians can address the electorate in their own vernacular, in a language easier to process, and in a direct communication style. Wilders and his PVV express a clear anti-European stance, even though they are represented in the EP, when they warn the electorate for the Netherlands' becoming a 'province of the European super-state' (Dossier Wilders 2010: 26).

The mainstream Janus-faced parties, such as the liberal VVD, the Christian democratic CDA, and the social democratic PvdA, which support the European project, have a hard time struggling with Eurosceptic parties, such as the PVV or SP, when European topics in the Dutch arena are at stake. Jean-Claude Juncker, the President of the European Commission, accused the mainstream Dutch parties of not protecting the EU in the Dutch referendum on the European Constitution in 2005, when more than 60 percent of the Dutch electorate voted against it. According to him, the mainstream political parties imitate the 'populist' parties: 'In the end, the European Parliament will only have Eurosceptics. That would be a catastrophe' (Juncker 2014).

Migrants Must Speak Dutch

The Netherlands has been actively supporting mobility and other forms of migration as an outcome of the four European freedoms and the liberal state doctrine. With respect to the inclusion of migrants, two periods of policy-making in the Netherlands can be distinguished.

The first period started in 1983, when the official policy document on migration stated that migrants had the right to preserve their heritage languages and cultures. As an outcome of this policy, it was possible for migrant children to receive education in their home language in elementary schools paid for by the government. This educational policy gave contents to the concept of a multicultural society. However, in-depth studies on the language proficiency of migrants' children, who had participated in home language education in elementary school, radically changed the policy perspective. It turned out that especially Turkish and Moroccan youngsters in their last year of elementary education at the age of twelve faced serious deficient language skills in Dutch compared to their Dutch classmates (Crul–Doomernik 2003). Due to the delay in language development, migrant children had to qualify for lower types of secondary education, resulting in much worse positions on the labour market. The government led by the Christian democratic PM Balkenende concluded that

this situation was caused by the fact that migrant children were also educated in their home language at elementary school and by the fact that they spoke with their parents, who also faced deficient language skills in Dutch, their heritage language at home. Hence, the second Balkenende cabinet decided to abolish the state-sponsored heritage language education of migrant children in elementary school in 2004. From then on, all educational efforts were concentrated on teaching migrants and their children Dutch at school and preferably also in the home context. The switch from a multicultural to an assimilatory language policy was motivated first and foremost on economic ground. It was argued that improving Dutch language proficiency among migrants and their children was needed for strengthening their position on the labour market (Koopmans 2015). However, this switch did not imply that migrants and their children were integrated successfully into the Dutch society. Not only migrants are facing assimilatory pressure in the European Union, including the Netherlands, but also internally mobile European citizens such as workers from Eastern Europe. Council Directive 77/486/EEC of 25 July 1977 on the education of the children of migrant workers (see Official Journal of the European Communities No L199/32, 6 August 1977) in their own mother tongue has hardly been facilitated in the member states of the Union.

The outer circle of the floral configuration model has become a space for 'othering' and exclusion of migrants. Anti-establishment politicians, such as Wilders, used the mobilizing power of language in the political messages targeted at 'his' commoners, who were affected by the Eurozone crisis mostly, and discriminated internally mobile European citizens, such as Poles, and immigrants from outside Europe, or other newcomers, especially Muslims, with language games. Consider some of these examples.

In the annual general political debate in the Dutch Parliament on 16 September 2009, Wilders proposed to tax the Muslim headscarf as an expression of his disgust for this symbol of Muslim faith among women. He expressed this by his newly coined Dutch word 'hoofddoekjestaks'. Note the typical use of the Dutch diminutive plural '-jes' suffix attached to 'hoofddoek'– 'headscarf' and the Dutch spelling, i.e. 'taks' for English 'tax', emphasizing the opportunistic nature of this form of taxes on purpose and not using the Dutch ordinary word 'belasting' for 'taxes'. His proposal was received with unbelief in the Dutch Parliament. At some point, it was considered as a joke in bad taste, but then it all got the humiliating exclusive contents by replacing 'hoofddoekjestaks' with 'kopvoddentaks', which means 'head rag tax', where the Dutch word 'kop' has a clear pejorative meaning compared to the normal Dutch word for "head", i.e. 'hoofd'. According to Wilders, the 'kopvoddentaks' actually implies that any Muslim woman who wants to wear a headscarf would have to apply for a licence, and pay one thousand euros for the privilege. Wilders claimed the money raised would be used to support women's

emancipation programmes (Kuitenbrouwer 2010: 34–36). Another neologism with the intention of othering and exclusion of Muslim immigrants is Wilders' term 'haatbaard', i.e. 'hate-beard': 'Our streetscape starts to look in some places more like the one of Mecca and Teheran. Headscarves, hate-beards, burqas, men in weird long white dresses. Let us do something against this.' Wilders refers with the expression 'hate-beard' to Muslims who distribute hate speech and/or wear a beard (Kuitenbrouwer 2010: 96). With the newly coined term 'straatterroristen', i.e. 'street terrorists', Wilders is referring to street gangs of Dutch-Moroccan youngsters. However, instead of associating these gangs with acts of crimes, he associates them with ideologically motivated acts of violence such as the killing of Dutch film director Theo van Gogh by Dutch-Moroccan Muslim fundamentalist Mohammed Bouyeri (Dossier Wilders 2010: 198) and the 'Islamic intifada', i.e. the political-ideological struggle of the Palestinians in Israel (De Bruijn 2010: 26). In sum, Wilders' rhetoric language is used as a political tool (Pool–Grofman, 1984) to mobilize 'his' electorate, the Dutch commoners, and to exclude migrants.

However, not only Dutch anti-establishment forces use language to demarcate socio-political positions but also the national cosmopolitans, i.e. the mainstream political parties and their clientele who are representing the state power, use language for purposes of demarcation and exclusion as well. They use their power positions by controlling the normative variety of the official language of the Dutch state. This allows them to include their own clientele and exclude migrants and newcomers from the labour market. The study of Ghorashi and Van Tilburg (2006) among a hundred highly educated refugee women, especially from Iran and Afghanistan who have gained the highest possible language skills for foreigners in the Netherlands, demonstrates that these language skills seem to be the main obstacle to enter the labour market in the Netherlands. When applying for a job with a better organization or company, they received the response that 'our company stands for high quality and people with accents do not fit the image of the organization'. Ghorashi and Van Tilburg conclude that 'neither knowledge of the Dutch language nor obtaining a higher degree in the Netherlands is enough for integration in the Dutch labour force' (Ghorashi and Van Tilburg 2006: 62). Hence, the Dutch assimilatory policy may give entrance to the labour market, but discrimination is practised by controlling the normative variety of the Dutch language. Note that national cosmopolitan elites use in much more subtle manner the normative variety of Dutch for exclusionary practice than their anti-establishment counterparts. Contrary to the direct communication of othering used by anti-establishment forces, this represents a more hidden form of exclusion.

Conclusions and a Research Agenda

So far, Europeanization has been a project that has served the interests of the European elites, i.e. of those that can make optimal use of the European freedoms, mobility, and markets. In the framework of the floral figuration model, I referred to the European elites as Eurostars and national cosmopolitans. However, the challenge is to keep Europe attractive not only for its elites but also for its commoners. Wallace et al. (2015) observe that social policy within the EU is still a matter of the Member States. Hence, the task is to develop a genuine Social Europe that offers solidarity for all of its citizens. Although the diverging interests between the European elites and commoners has been noticed in the literature, such as in Neil Fligstein's 'Euro-clash' (Fligstein 2008), it has gone unnoticed that the Euro-clash between social groups involves unbridgeable language conflicts as well. These language conflicts have been intensified due to the Eurozone crisis.

   In this paper, I have argued that language issues are vital for the development of Social Europe. Although the importance of language and communication is recognized at the state level, this topic is quite often neglected when it comes to the European level. The interplay between multilevel and linguistic governance in Europe can best be analysed in terms of the floral figuration model in the sense of De Swaan (1988). The typology of social actors, their language skills, their communication channels and styles, and their positioning in this model demonstrate that in the present constellation transparent, efficient, and fair communication is impossible. The multilingual communication patterns are first and foremost group-specific and exclusivist, as the case study of the Netherlands demonstrates. This country has recently opted for a neoliberal welfare system to address the Eurozone crisis; it has been unable to cope with recent mass immigration and, as a consequence, it has experienced a Euro-clash in which anti-establishment parties have become fixed political forces. The types of patterns of linguistic and communicative exclusion that turn up in the Dutch case will block any form of genuine solidarity or any relevant initiative for a common social policy in Europe. The introduction of an English-based lingua franca in Europe referred to as Euro-English will not be sufficient to solve the linguistic and communicative deficits. English as a code of functional communication is not equipped to bridge the subtle semantics and concepts inherent in the social and political cultures of Europe. A standardized variety of English, i.e. BBC English, is also unfit to function as a European bridge language due to native speaker involvement excluding non-natives from native norms. Hence, the absence of a neutral, transparent, and accessible lingua franca jeopardizes the development of Social Europe. Neither will the official language policy of the European Union in education, the so-called 1 + 2 formula, i.e. the teaching of a mother tongue and two other European languages (Marácz & Rosello 2012: 22), overcome linguistic and communicative exclusion due to the fact that

this scheme will only be able to cover a subset of the 24 official languages of the Union. In case English will be one of the languages in the 1 + 2 scheme, similar problems will arise, as just discussed in case English would be used as a bridge language. Hence, a way out of this language-use deadlock would be to elaborate on multilingual and transnational communication codes based on fairness. Here I agree with Jean-Claude Barbier (2013: 21) that these codes must include plural idioms that are bridged by multilingual and transnational communication strategies, such neutral lingua franca communication, including artificial languages like Esperanto, Ido, and so on, translation and interpretation, which is already used extensively in the Brussels institutions, and intercomprehension. The latter is a multilingual communication technique that interlocutors can rely on when all of them speak their own mother tongue in a communication event. This is especially effective when related languages, such as the ones of the Romance or Germanic language families, are being used. As a task for further research, I will elaborate on the refinement of the floral figuration model against the background of the typology of welfare states proposed by Esping-Andersen (see Esping-Andersen 1990). It is to be expected that much more patterns of linguistic and communicative exclusion will turn up in the process of fine-tuning.

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Old and New Minorities: Diversity Governance and Social Cohesion from the Perspective of Minority Rights

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Abstract. Minority rights instruments have been traditionally applied to old minority groups. This paper examines to what extent these same instruments are conceptually meaningful to the integration of new minorities stemming from migration. The conviction that minority groups, irrespective of their being old or new minorities, have some basic common claims that can be subsumed under a common definition does not mean that all minority groups have all the same rights and legitimate claims: some have only minimum rights, while others have or should be granted more substantial rights; some can legitimately put forward certain claims – not enforceable rights – that need to be negotiated with the majority, while others should not. In order to devise a common but differentiated set of rights and obligations for old and new minority groups, it is essential to analyse the differences and similarities of both categories of minorities, their claims, needs, and priorities; in this way, it will be possible to delineate a catalogue of rights that can be demanded by and granted to different minority groups. Studying the interaction between traditional minorities and migrants or old and new minority groups is a rather new task because so far these topics have been studied in isolation from each other. It is also an important task for future research in Europe since many states have established systems for the rights of old minorities but have not as yet developed sound policies for the integration of new minority groups stemming from migration.

Keywords: old minorities, new minorities, diversity, integration, minority protection, accommodation

1. Introduction

In the recent decades, most European countries have experienced a marked increase in the number of migrants residing on their territories. Partly for political and humanitarian reasons, partly as a result of differing economic situations as well as the freedom of movement entailed by the growing economic integration in Europe, an increasing number of people with distinctive identities in terms of language, culture, or religion have settled, with varying degrees of permanence, in countries other than their countries of origin (Eurostat, IOM, UNHCR).

Although economic actors and decision-makers generally recognize the useful contribution to the labour force and the positive impact on the demographic structure of a steadily ageing population, the presence of large immigrant and refugee communities poses manifold challenges in the sphere of integration, cultural differences, protection of individual and group rights, preservation of social cohesion and unity. As a result, most European states have been searching for models and policies to accommodate diversity claims and integrate new minority groups stemming from international mobility flows.

Considering that today the principal cause of the emergence of minorities in the world is migration, the present paper contends that it is possible to address major issues concerning diversity management by bridging two fields of research: minorities and migration. Studying the interaction and complementarities between 'old' and 'new' minority groups is a rather new task because so far these topics have been studied in isolation from each other. It is also an important task for future research in Europe, where many states have established systems of 'old' minority rights but have not yet developed sound policies for the diversity management of new minority groups originating from migration.

The present paper seeks to analyse whether it is possible to reconcile the claims of historical minorities and of new groups originating from migration and whether policies that accommodate traditional minorities and migrants are allies in the pursuit of a pluralist and tolerant society. The paper will ultimately address the question whether it is possible to develop a defensible model for diversity management that reconciles unity and diversity and that overcomes, at the same time, the traditional 'old–new' minority dichotomy.

2. Old and New Minorities: Still a Valid Dichotomy?

The terms *historical*, *traditional*, and *autochthonous minorities* – the 'old minorities' – refer to communities whose members have a distinct language, culture, or religion as compared to the rest of the population and who have become minorities through the redrawing of international borders, having seen

the sovereignty of their territories shift from one country to another. These are ethnic groups that have not achieved statehood on their own for various reasons and that have now become part of a larger country (or several countries): they are the so-called 'old minorities' or 'sub-state nations'. In many but not all cases, their co-ethnics may be numerically or politically dominant in another state, which they therefore regard as their 'external national homeland', or kin-state.[1]

New minority groups stemming from migration – the 'new minorities' – refer to groups formed by individuals and families who have left their original homelands to emigrate to other countries: these are the so-called 'new minorities'. In most cases, their reasons are economic, although political reasons play an increasingly important role as well. New minorities thus consist of migrants, refugees, and their descendants who are living in a country other than that of their origin, on a basis that is more than merely transitional.

It must be acknowledged that the term 'new minorities' is subject to difficulties and criticism as it seems to imply that migrants and individuals with a background of migration are in a 'minority' position, such that their status is 'minoritized'. On the contrary, the term underlines the diversity accompanying these individuals and groups, which requires protection and promotion if desired. The use of the term is intended to refer to 'distinct' groups, and it by no means implies a weakening of their status. On the contrary, it aims to offer additional legal tools with which to respond to their specific needs for protection.[2] Moreover, the term 'new minorities' is broader than the term 'migrants' as it encompasses not only the first generation of migrants but also their descendants, extending to include second and third generations of individuals with a background of migration, many of whom have been born in the country of immigration and who cannot objectively or subjectively be subsumed under the category of 'migrants'. Moreover, as stated previously, the term 'new minorities' emphasizes

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1   It has to be noted that there is a subtle continuum between minority groups and indigenous peoples. Without entering into details in this controversial issue, it has to be admitted that the debate about the difference between indigenous peoples and minorities is indeed complex. It is not easy to distinguish between a group that calls itself an 'indigenous people' and a group or minority that recognizes itself as being native to a given territory and that invokes that characteristic in order to obtain its rights.

2   On this point, see the comment made by the Advisory Committee of the FCNM on BiH, in which it noted that 'Bosniacs and Croats in the Republika Srpska as well as Serbs in the Federation could also be given the possibility – in case they so wish – to rely on the protection provided by the Framework Convention. Taking into account the organizational autonomy enjoyed and the wide powers exercised by the Cantons in the Federation, the same possibility could also be given to the Croats and the Bosniacs living in the Cantons where they constitute a numerical minority. The Advisory Committee wishes to make clear that this possibility would by no means imply a weakening of their status as constituent peoples as provided for by the Constitution, but merely aim at offering an additional tool to respond to a specific need for protection' (ACFC 2004a, paragraph 28).

the diversity of the individuals concerned as well as their related individual and collective rights,[3] whereas the term 'migrants' does not.[4]

It is important to note that some countries use regularly the term 'minorities' to refer to immigrants living on their territories. For instance, in the United Kingdom, the term 'ethnic minorities' is used in preference to 'migrants'. This terminological preference reflects a policy of regarding legally resident migrants (particularly those who were born in the country concerned) as a permanently established part of the population. The term 'migrants' is avoided because it not only implies that they moved to the country but also because, as said earlier, it is simply incorrect to describe persons born in the country of migrant parents as 'migrants' (Murray 1997: 219). Use of the term 'ethnic minority' in such contexts, however, in no way necessarily implies the existence of any legal minority status. Its significance is rather administrative in that it may qualify them or their associations for various grants and make them potential beneficiaries of equal opportunity policies, but it does not necessarily entail other rights included in specific instruments on minority rights.

A crucial matter in discussing issues related to the diversity management of minorities – 'old' and 'new' alike – is that claims of minorities are often perceived as a challenge and antagonistic to the traditional model of homogeneous 'nation-states' because both groups seek to increase opportunities within this model to express their identities and diversities at individual and group level. Moreover, historical minorities and migrants are often perceived as *foreigners* to the community of shared loyalty towards the state and shared rights guaranteed by that state. Members of historical minorities and migrants are seen as loyal to their kin-state or to the state whose citizens they are and to whose sovereignty they belong to as long as they are not absorbed into the national body through assimilation or naturalization.

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3   One vexing yet unresolved question concerns whether minority rights have a collective or an individual dimension. From the collective perspective, the minority group itself is the beneficiary of the protection to be afforded. In the individual perspective, the beneficiaries are the individual members of the group. A third position draws upon the formula of individual rights as 'collectively exercised', representing a middle road between the rights of individuals and full collective rights. In the current debate on the individual or collective dimension of minority rights, a pragmatic position holds that, because human experience has endowed human beings with both individual and social dimensions, there is no dichotomy between the individual or collective dimension and that there is therefore no need to choose. As stated by Marko, 'These two forms of rights not only can but even must be used cumulatively when organising equality on the basis of difference' (Marko 1997: 87).

4   Most international instruments for the protection of migrants (e.g. the UN 1990 International Convention on the Protection of the Rights of All Migrants Workers and Members of Their Families, the CoE 1977 Convention on the Legal Status of Migrant Workers, or the EU 2004 Directive on the status of third-country nationals who are long-term residents) contain only vague references to the protection and promotion of the identities of migrants, and some even contain potentially conflicting 'integration' requirements, whilst the notion of group rights is completely absent.

Historically, new minorities stemming from migration have reacted very differently to majority, dominant societies than historical minorities (Walzer 1995).[5] Unlike historical minorities whose cultural traditions may pre-date the establishment of the state whose members now find themselves citizens, generally, few migrant groups object to the requirement that they must learn the official language of the host state as a condition of citizenship or that their children must learn the official language in school. Migrants usually accept that their life chances and those of their children depend largely on the participation in mainstream institutions operating in the majority language (Kymlicka 2001).

With regard to new minorities but also to a certain extent to traditional minorities, especially in case of mixed marriages, the problems of integration of the second and third generations can be quite acute. Children of second and third generations are in fact subjected to the decisions taken by their parents, and their living between two cultures and languages can be perceived either as an enriching experience or, often, as an excessive burden. This is due to the fact that often the second and third generations of migrants' descendants have less cultural distance from the host society than their parents, but they have not reached a satisfactory degree of integration from a socio-economic viewpoint.

While it is acknowledged that there are exceptions, it can be said that the primary demands insisted on by new minorities are thus mainly directed towards improving their integration in the host communities. New minorities generally seek to reform main public institutions in the host countries in order to provide greater recognition of their identities and greater accommodation of their practices so as to facilitate their participation in these institutions. They may want schools to provide more information about the immigrant experience, workplaces to accommodate their religious holidays or traditional dress, government agencies to provide health care and welfare benefits in a way that are culturally sensitive, and so on (Kymlicka 2001).

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5   According to Walzer, immigrants are considered to have made a *choice* to leave their own original culture and know that the success of their decision will depend on integrating into the mainstream of their new society. In these cases, ethnic diversity arises from the *voluntary* decisions of individuals or families to uproot themselves and join another society. On the contrary – Walzer argues –, old minorities are settled on their historic homelands. These groups find themselves in a minority position not because they have uprooted themselves from their homeland but because their homeland has been incorporated within the boundaries of a larger state. This incorporation is usually *involuntary*, resulting from conquest, colonization, or the ceding of territory from one imperial power to another. Under these circumstances, it is argued that minorities are rarely satisfied with non-discrimination-individual rights model and eventual integration. What they desire, Walzer says, is 'national liberation', that is some form of collective self-government, in order to ensure the continued development of their distinct culture (Walzer 1995: 139–154). This differentiation is, however, questionable mainly because it is debatable whether migrants have really made a voluntary 'choice' to migrate. This applies not only to refugees or those fleeing from wars or natural disasters but also to the so-called 'labour migrants' who escape from economic distress.

On the contrary, historical minorities generally resist assimilation more strenuously, despite economic incentives and political pressures to do so, and prefer instead to seek official recognition for the separate and autonomous use of their language and enjoyment of their culture.[6] Hence, the claims of historical minorities do not only concern the equal treatment of their members and the preservation and development of their identity within the dominant society but also those aiming at guaranteeing the effective participation in public life for their members through measures that range from territorial or non-territorial forms of autonomy to secession.[7]

The differences between minority and majority groups, old and new alike, may be profound or may be difficult to discern. However, what distinguishes all minority groups is that they manifest, albeit implicitly, a desire to maintain a collective identity which differs from a dominant culture. Culture in this context is not synonymous with particular practices, customs, or manners of dressing. It is a sense of communal self-identity that pervades almost every aspect of life, including work and economic activity. It is the 'traditions of everyday life' (Wheatley 2003: 508).

In the current discussion on minority issues, it is debated whether the scope of application of international treaties pertaining to minorities that are usually applied to historical, old minorities can be extended to new minority groups stemming from migration (Kymlicka 2007, Hofmann 2006, Hofmann 2004, Medda-Windischer 2009, Medda-Windsicher 2011). The positions in this regard are extremely diversified: among the states, some have adopted rather narrow views firmly opposing the extension of minority provisions to new minorities (Germany, Estonia) (FCNM 1995a; FCNM 1997), others have instead pragmatically applied some provisions to new groups (United Kingdom, Finland) (ACFC 2001a, paragraph 14; ACFC 2004b), and some others have not yet taken an official position. Most international bodies dealing with minorities have adopted an open approach, especially the Advisory Committee on the Framework Convention (ACFC 2001b, p. 34; ACFC 2002a, p. 40; ACFC 2002b, paragraph 18), the European Commission for Democracy Through Law (Venice Commission 2007), the UN Human Rights Committee (HRC 1994, paragraph 5.1–5.2), the UN Working Group on Minorities (Eide 2000), and the OSCE High Commissioner on

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6   See, among others, Article 5(2) of the CoE Framework Convention for the Protection of National Minorities, which protects persons belonging to national minorities from assimilation against their will. It does not prohibit voluntary assimilation, and it does not preclude member states from taking measures in pursuance of their general integration policy.

7   In general terms, territorial autonomy involves the granting of separate powers of internal administration, to whatever degree, to entities possessing some ethnic or cultural distinctiveness without those areas being detached from the state. The creation of new political units which enable members of historical minorities to exercise self-governing powers over public institutions are variously referred to as multinational federations, quasi-federal autonomy, or extensive self-government regimes.

National Minorities, which has recently extended its mandate to new minority groups stemming from migration (OSCE 2004, OSCE 2006, Ekéus 2006).

This broad state's margin of discretion as to the beneficiaries of minority protection depends largely on the fact that, on the whole, drafters of international instruments have been so far unsuccessful in efforts to define the term 'minorities'. Indeed, in international law, there is no generally recognized legally binding definition of the term 'minority', not to mention ethnic, religious, or linguistic minorities, despite several attempts in the past decades to elaborate such concepts. A significant amount of energy and time has been spent over the past five decades by various international organizations in the quest for a generally acceptable definition of the term minority, mainly for codification purposes, yet no conclusive results can be reported. In the case of the UN Declaration on the Rights of Persons Belonging to National or Ethnic Religious and Linguistic Minorities as well as the CoE Framework Convention for the Protection of National Minorities, drafters expressly avoided a definition of the term 'minorities', leaving this to the courts, parliaments, governments, or other bodies involved in the interpretation of these instruments.

However, an approach that leaves the question of minority definition open to the state's margin of appreciation is not fully satisfactory because it can lead to inconsistent implementation to minority groups that find themselves in analogous situations of the same provisions by different states in breach of the principle of non-discrimination.[8]

Along the line of the most quoted definition of minorities – the Capotorti's definition (Capotorti 1977)[9] –, on the basis of a combination of objective and subjective elements – i.e. ethnic, cultural, religious, or linguistic characteristics, residence or legal abode, numerical minority, non-dominant position, and a sense of solidarity or will to survive –, a general definition of minorities can be formulated as follows: a minority is any group of persons, (i) resident within a sovereign state on a temporary or permanent basis, (ii) smaller in number than the rest of the population of that state or of a region of that state, (iii) whose members share common characteristics of an ethnic, cultural, religious, or linguistic nature that distinguish them from the rest of the population, and (iv) manifest, even only implicitly, the desire to be treated as a distinct group.[10]

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8   Any reliance in an international instrument on the notion of 'minorities', as in Article II-81 of the Charter of Fundamental Rights of the European Union, should be based on a common legally binding definition of minorities and should not be subject to diverse interpretations in different Member States. Moreover, insofar as the notion of rights of minorities is relied upon in the future EU accession processes with respect to Turkey – as it should, according to the criteria defined by the Copenhagen European Council of June 1993 –, the understanding of the concept of minority should be clarified.

9   In the Capotorti definition, only nationals/citizens of the state concerned are included (see Capotorti 1977, paragraph 568).

10 The requirement to manifest the desire to be treated as a 'distinct group' includes in the definition 'constitutive peoples' as those existing in BiH.

In this definition, the element of *citizenship*, which is usually required by states in order to limit the personal scope of application of most international instruments on minorities, is replaced by the element of *residence or legal abode* (Bauböck 1994).[11] This general definition would be the basis for advocating the extension of the scope of application of international instruments pertaining to minorities, in particular the CoE Framework Convention for the Protection of National Minorities as to include new minority groups originating from migration. This extension would reverse the fact that, as seen above, most international instruments on migrants' rights contain only vague and weak references to the protection of migrants' identity and diversity. But the protection of the identity of minorities, and in particular of new minorities, is one of the bases of a veritable process of integration in which minority groups can develop a genuine sense of loyalty and common belonging with the rest of the population without being threatened of being forcibly assimilated in the mainstream society, which as a result can endanger resistance and alienation.

A general common definition of minorities is based on the conviction that in spite of their differences old and new minorities share some common characteristics and thus voice similar claims, namely the right to existence, the right to equal treatment and non-discrimination, the right to identity and diversity, and the right to the effective participation in cultural, social, and economic life and in public affairs (Eide 1993).[12] Alongside common claims, the rationale behind the protection for old and new minorities has likewise a common basis, namely maintaining and promoting peace and security, protecting human rights and cultural diversity as well as democratic participation and democratic pluralism (Åkermark 2007: 8).

While there are evident differences between old and new minority groups, these relate only to certain rights in the international catalogue. This is not a

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11   This approach follows the concept of *civic citizenship* endorsed in most recent EU instruments from the Charter of Fundamental Rights of the Union to the Long-Term Residents Directive for Third Country Nationals (TCNs) aiming at putting member state nationals and long-term third-country residents on a similar legal footing. The civic citizenship would be acquired by third-country nationals after five years' of residence in an EU country and would entail rights comparable to those of EU citizens, including the right to free movement and establishment throughout the European Union. The concept of civic citizenship is based on the idea of taking the residence requirement as a criterion to bring migrant and other minorities' rights and duties, as well as access to goods, services, and means of civic participation, progressively into line with those of the nationals of the country in which they live, under conditions of equal opportunities and treatment. In this perspective, integration of migrants and members of minorities would be measured in terms of *citizenship rights* rather than nominal *citizenship status* (see Bauböck 1994, paragraph 3.1).

12   This is also the article-by-article approach favoured by the Advisory Committee of the Framework Convention and by Eide, Asbjørn, former Chairman of the former UN Working Groups on Minority. He summarized this point by saying: 'The scope of rights is contextual' (see Eide 1993, paragraph 27).

matter of interpretation; it is clearly expressed in the international instruments. For instance, the most relevant legal instrument on minority protection, the Framework Convention for the Protection of National Minorities, contains only three articles that condition their entitlements on 'traditional' ties, which, according to the Explanatory Report of the Framework Convention, are not necessarily only those of historical minorities. In this regard, the Explanatory Report states, rather ambiguously, that the term 'inhabited ... traditionally' – referred to by Art. 10(2), Art. 11(3), and Art. 14(2) of the FCNM – 'does not refer to historical minorities but only to those *still* living in the same geographical area' (FCNM 1995b, paragraph 66). These provisions pertain to the use of the minority language in public administration and on public signs and also in relation to education in the mother tongue; all other entitlements relate to all individuals who may be in the position of a minority, thus old and new minorities alike, groups officially recognized as national minorities and those not recognized, individuals with or without the citizenship of the country in which they live.

In particular, the right to identity and diversity represents in many ways the essence of the case for minorities within the corpus of human rights – the claim to distinctiveness and the contribution of a culture on its own terms to the cultural heritage of mankind. The identity to be protected and promoted may be national, ethnic, cultural, religious or linguistic, or taken all together. The concept of identity is a broad and important concept for individuals and communities since it concerns their belonging, their way of thinking, feeling, and acting. Consequently, respect for and protection of identity can be considered as constitutive elements of respect for human dignity that is clearly a common attribute to the so-called 'old' and 'new' minorities alike.[13]

As often is the case within the international normative system of human rights, there are close links between the right to identity and other rights contained in the catalogue of international human rights: the right to education, language rights, freedom of religion, freedom of expression and information, and freedom of assembly and association.

The claims of minorities to preserve their identity in terms of language, religion, and cultural practices can be a matter of high priority for some minority groups but of lower importance for others until they have received proper equal protection of their basic human rights. Protection of identity entails, at the very least, the right to use one's own language in non-official contexts, the freedom of opinion and its expression, including the right to publish in any language

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[13]   On the protection and promotion of identity, see Art. 5 of the FCNM and Art. 1 of the UN Declaration on the Rights of Persons Belonging to National or Ethnic, Religious or Linguistic Minorities. The right to be different is proclaimed by Art. 1(2) of the 1978 UNESCO Declaration on Race and Racial Prejudice. See also the Convention on the Protection and Promotion of the Diversity of Cultural Expressions adopted by the UNESCO General Conference on 20 October 2005, which preserves and promotes 'creative' diversity.

without restrictions, and the freedom to practice one's religion in any way not infringing the rights of others. States shall not only abstain from policies which have the purpose or effect of assimilating the minorities into the dominant culture (negative action), but they shall also protect them against activities by third parties, which have assimilatory effect (positive action).

Crucial in regard to the right to identity are, for instance, language policies. Denying minorities the possibility to learn their own language or the transmission of the knowledge of their own culture, history, and tradition would be a violation of the obligation to protect their identity.[14] At the same time, although people belonging to minorities are not under a legal obligation to integrate, they are aware that if they want to participate in the wider national society, they have to acquire, for instance, a proper knowledge of the official language. In this respect, international norms set out two general parameters: on the one hand, preserving identity and, on the other hand, integrating into the overall national society while keeping one's identity.[15]

Obviously, when reference is made to universal human rights or some basic norms of minority protection, there is no need to distinguish between persons belonging to ethnic, religious, or linguistic groups made up of recent immigrants or those living in a given territory from time 'immemorial'. Other claims, such as the claim to use a minority language in relations with the authorities or the claim to street names in the minority language, are more specific and need to be differentiated.

In these contexts, the form of settlement in which the minority group lives is also relevant: in the case of historical minorities living compactly, forms of territorial autonomy can be the best solution to be negotiated, whereas where minorities live dispersed among the majority, not forming a majority in any substantial area, other forms of institutionalization of these rights are required, which may well include non-territorial, functional variants of autonomy. Obviously, effective participation in public life includes not only participation in political life and how an adequate representation should be devised but also participation in cultural, social, and economic life.

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14   See Article 14 FCNM, Article 29 of the 1989 Convention on the Rights of the Child, Article 13 of the 1966 International Covenant on Economic, Social and Cultural Rights.

15   See Art. 6 FCNM. According to the Explanatory Report of the FCNM on this article: 'In order to strengthen social cohesion, the aim of this paragraph is, *inter alia*, to promote tolerance and intercultural dialogue, by eliminating barriers between persons belonging to ethnic, cultural, linguistic and religious groups through the encouragement of intercultural organisations and movements which seek to promote mutual respect and understanding and *to integrate these persons into society whilst preserving their identity*' (paragraph 49) [emphasis added]. See also Art. 12 FCNM that according to the Explanatory Report: '…seeks to promote knowledge of the culture, history, language and religion of both national minorities and the majority population in an intercultural perspective'.

3. A Common but Differentiated System of Protection

The conviction that minority groups, regardless of being old or new minorities, have some basic common claims, can be subsumed under a common definition, and the rationale of their protection is fundamentally the same does not mean that all minority groups have all the same rights and legitimate claims: some have only minimum rights, while others have or should be granted more substantial rights; some can legitimately put forward certain claims – not enforceable rights – that have to be negotiated with the majority, while others not. For instance, the members of any minority have the right to use their own language, in private and public, with anyone who is prepared to communicate with them in that language; but not all minorities or not all of their members have the legitimate claim to receive state-funded education in their own language or to use their own language in communication with public officials.

In this context, the difference is not (only) based on the fact that a given group belongs to the 'old' or 'new' minority category: other factors are relevant and apply indistinctively to old and new minorities alike such as socio-economic, political, and historical factors, legacy of past colonization, or forms of discrimination but also the fact that members of a minority live compactly together in a part of the state territory or are dispersed or live in scattered clusters or the fact that members of a community having distinctive characteristics have long been established on the territory, while others have only recently arrived. Minority groups, old and new minority groups, are not a sort of indistinctive monoliths but are composed of groups very different from each other. The catalogue of minority rights has been so far implemented to historical minorities without an abstract differentiation among various minority groups but by taking into account other more pragmatic factors, such as those mentioned above. The same approach should be applied when extending minority protection to new minority groups stemming from migration.

In order to develop a common but differentiated system of protection, it is crucial to differentiate between *justifiable rights* and *legitimate claims*. The former – *justifiable*, or *enforceable rights* – are rights expressly provided in legal norms or that can be deducted from legally binding judgments such as those of the Strasbourg Court. The latter – *legitimate claims* – refers to claims that acquire strength from contextual, specific factors. The classification of a claim as 'legitimate' is based on factors that cannot be reduced to the old/new minority dichotomy, but it is based on contextual factors such as long presence on a territory, type of settlement (compact, scattered, or dispersed), past forms of discrimination, colonial legacy, contribution to the history or economy of the wider national society, and so on.

The table below identifies and differentiates a set of rights and legitimate claims that can be demanded by either old minorities or new minority groups

stemming from migration or both groups. This scheme is largely based on the jurisprudence of the European Court of Human Rights (hereinafter as 'Strasbourg Court' or 'ECtHR') but also on the views and opinions of other international monitoring bodies such as the UN Human Rights Committee and the Advisory Committee of the Framework Convention.[16]

Table 1. *Old/new minorities: a common but differentiated system of minority protection*

	OLD MINORITIES		NEW MINORITIES	
Typology of Claim	Justifiable right*	Legitimate claim**	Justifiable right*	Legitimate claim**
Language				
Use of minority language in elected bodies	no	yes (but knowledge of the official language may be required)	no	no (not reasonable/ feasible)
Use of minority language with public administration	no	yes	no	no (not reasonable/ feasible)
Use of minority language in judicial proceedings	yes (but no if there is evidence of sufficient knowledge of the official language) (ECtHR, *Kamasinski v Austria*)	yes (even in case of knowledge of the official language)	no (but yes if there is evidence of insufficient knowledge of the official language)	no (not reasonable/ feasible)
Education				
Publicly funded education in minority language/ religion	no (unless provided for other groups)	yes (states may legitimately require respect for certain principles/ values in the curricula)	no (unless provided for other groups)	yes (states may legitimately require respect for certain principles/ values in the curricula)

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16 The Strasbourg system is particularly appropriate for the purpose of the present study as the judgments of the European Court of Human Rights are legally binding upon state parties and thus their impact is more effective than the views of the UN Human Rights Committee or the opinions of the Advisory Committee of the Framework Convention. Besides, the geographical limitation of this instrument and the higher degree of homogeneity among its Member States in comparison to the UN instruments simplify the process of searching for a consensus around the issues brought under its scrutiny. For the full text of the judgments of the Strasbourg Court, see the official webpage of the Court at: <http://www.echr.coe.int/ECHR/EN/Header/Case-Law/ HUDOC/HUDOC+database/>. For a detailed analysis of the ECHR judgments relevant to this present study, see Medda-Windischer 2009.

	OLD MINORITIES		NEW MINORITIES	
Typology of Claim	Justifiable right*	Legitimate claim**	Justifiable right*	Legitimate claim**
Use of minority language in public education	no (unless initially provided and then abrogated) (ECtHR, *Cyprus v Turkey*)	yes (empirical evidence in different forms/ contexts: South Tyrol, Catalonia, Québec, etc.). More emphasis on the knowledge of minority language	no	yes (empirical evidence mainly as extracurricular classes) More emphasis on the knowledge of the official language
Political Participation				
Electoral rights (passive/active rights)	yes (on the basis of citizenship, otherwise no)		no (in case of individuals without citizenship of the country of residence)	yes (at least at local level)
Participation in decision-making (e.g. reserved seats/quota/ advisory bodies)	no (but no interference from the Strasbourg Court if forms of participation – exemptions from threshold/quota – are recognized) (ECtHR, *Lindsay v the U.K.*)	yes (empirical evidence/ precedents at local and national level)	no (but no interference from the Strasbourg Court if forms of participation – exemptions from threshold/quota – are recognized) (ECtHR, *Lindsay v the U.K.*)	yes (at least at local level)
Autonomy (Local/territorial/ regional)	no	yes (empirical evidence; South Tyrol, Catalonia, etc.)	no	no (no empirical evidence as well as decisions of the Strasbourg Court in this sense) (ECtHR, *Kalifatstaat v Germany*)

* Justifiable rights can be enforced in court (national and international tribunals); they are based on norms directly enforceable, i.e. European Convention in Human Rights, or are inferred from ECHR case-law.

** Legitimate claims have to be negotiated with the majority and depend on contextual factors such as the type of settlement (scattered/concentrated), long or recent presence, legacy with past colonization or forms of discrimination, specific contribution to the history of a country, and so on.

To clarify the difference between justifiable rights and legitimate claims, examples can be taken from the so-called 'symbolic ethnocultural disputes', which, in contrast to 'claims of assistance rights', are disputes regarding aspects pertaining to the identity of a minority group that do not directly affect the ability of a group to enjoy or live according to its culture. These aspects range from how the state names groups or places through what historical figures are honoured with public buildings named after them or statues to special constitutional recognition of founding peoples or official languages. These disputes are about claims to recognition: recognition as a (or 'the') founding people of the polity or recognition as a group which has made important contributions to the state in which they live.

In this context, the demand to have a minority language be made one of a state's 'official' languages (or the demand to eliminate or prevent the category of 'official languages' altogether) is a symbolic one albeit one that might have an important impact on the whole range of assistance language claims. In these cases, groups with long-lasting, traditional ties to a given territory, groups that were settled on a territory before the 'social contract' or the constitutive national agreement was reached among the national groups or groups that have made special contributions to the state where they live or with whom the state has a legacy of past discrimination, colonization, slavery (for instance, Afro-Americans in the US, Jews in Germany, etc.) – all these groups may formulate claims that, although cannot be defined as *enforceable rights*, acquire 'legitimization' and have more weight in the negotiations with majority groups due to the above considerations.

Moreover, in case of lack of clarity or uncertainty from legal provisions, precedents or contextual factors as to whether a specific demand is an 'enforceable' right or a 'legitimate' claim, a general principle can be inferred from the analysis of relevant human rights and minority legal provisions and the case-law of main human rights bodies, particularly the Strasbourg Court.

The claim to use a minority language in the context of education can serve to illustrate this principle: despite the fact that both groups, old and new minorities, are under the obligation to learn the official language of the majority, in areas inhabited by old minorities, members of the majority can be sometimes obliged to learn the minority language (for instance, in South Tyrol, where the members of the Italian-speaking group living in South Tyrol are under the obligation to learn the minority language, German, at school and must provide evidence of the knowledge of the minority language if they want to obtain a post in the public administration of the Province of South Tyrol), whereas the same obligation cannot be found, at least as Europe is concerned, in areas inhabited even largely by new minorities.

Therefore, if it is true that managing the diversity of minorities is intrinsically asymmetrical due to the fact that members of minorities, both old and new, are under more pressure than members of the majority to 'adapt' to the majority society,

in terms of language knowledge or recognition of qualifications, for instance, in the case of old minorities, this asymmetry is more acute and demanding on the side of the majority.

4. Conclusions

The differences between minority and majority groups, old and new alike, may be profound or may be difficult to discern. However, what distinguishes all minority groups is that they manifest, albeit implicitly, a desire to maintain a collective identity which differs from a dominant culture. Culture in this context is not synonymous with particular practices, customs, or manners of dressing. It is a sense of communal self-identity that pervades almost every aspect of life, including work and economic activity. It is the 'traditions of everyday life' (Wheatley 2003: 508).

Many, especially among governments' representatives, worry that by extending the definition and protection of minority rights to migrants, they will claim the recognition of rights and powers similar to those granted to traditional minorities, thereby threatening unity and diluting the protection intended for old minority groups.

However, if it is true that in Western countries some immigrant groups demand certain group rights, it would be incorrect to interpret immigrant demands for recognition of their identities as the expression of a desire, for instance, for self-government (Kymlicka–Opalski 2001: 32–36). Migrants are generally aware that if they want to access the opportunities made available by the host countries, then they must do so within the economic and political institutions of these countries. For example, it is still the case that immigrants must learn the official language to gain citizenship or to get government employment or to gain professional accreditation. Active civic participation and effective integration amongst immigrants are essential to the economic prospects of most migrants and indeed to their more general ability to participate in the social and political life of the host country (EC 2005).

Obviously, this leaves open the possibility that some leaders of ethnic groups hope that integration policies will provide a channel for obtaining separatist policy. But, as Kymlicka observes, this is a vain hope, which massively underestimates the sort of support needed to create and sustain a separate societal culture: '[S]ustaining a certain culture is not a matter of having yearly ethnic festivals or having a few classes taught in one's mother-tongue as a child. It is a matter of creating and sustaining a set of public institutions through the use of instruments that are similar to those used by the majority in their programme of nation-building, i.e. standardised public education, official languages, including

language requirements, government employment, etc.' (Kymlicka 1997: 52–56). So far, there is no evidence from any of the major Western immigration countries that immigrants are seeking, and succeeding, to adopt a pro-sovereignty political agenda (Kymlicka 1997). Indeed, when attempts have been made, these were rejected by national and international courts.[17]

Clearly, it must be recognized that any decision to bring minorities of immigrant origin within the scope of application of international and/or national instruments pertaining to minorities is bound to be political. But if a country is serious about wanting to integrate immigrants, then that country should not oppose the extension of the scope of application of minority provisions to new minorities. As discussed earlier, this would not entail the extension of the full range of minority protection to all minority groups indistinctively; moreover, it might be seen as a very appropriate political gesture, a way of underlining the importance of integration policy and of sending out a powerful message that populations of immigrant origin are now clearly seen to be an integral though distinctive part of the nation.

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17   See the case decided by the European Court of Human Rights, *Kalifatstaat v Germany* (ECtHR 2006), concerning the ban of an association whose aim was the restoration in Germany of the caliphate and the creation of an Islamic State founded on *sharia* law.

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Concepts of Citizenship in Eastern and Western Europe

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Abstract. The classical meaning of citizenship evokes a nation-state with a well-defined territory for its nationals, where national identity and sovereignty play a key role. Global developments are challenging the traditional nation-state and open a new stage in the history of citizenship. Transnational citizenship involving dual and multiple citizenships has become more and more accepted in Europe. Numerous scholars envisaged a post-national development where the nation-state no longer plays a key role. While scholarly research tended to focus on developments in Western Europe, a dynamic development also took place in Eastern Europe following the collapse of communism. Dual citizenship was introduced in most Eastern European countries, but its purpose was to strengthen the nation by giving the ethnic kin abroad citizenship and non-resident voting rights. In Western Europe, the right of migrants to citizenship has been expanded throughout the years in the hope that this would result in their better integration into society. Eastern Europe and Western Europe operate with different concepts of citizenship because of their diverging historical traditions and current concerns. The concept of nation and who belong to the national community play a key role in the type of citizenship that they advocate.

Keywords: citizenship, double citizenship, minorities, national minorities, migration, integration, multiculturalism

Definition of Citizenship

Citizenship can be defined as a membership in a political and geographic community, where there is the closest legal relationship between a state and a person, in which both have the widest reaching rights and obligations. Historically, the nation-state had a distinct territory and provided the administrative framework to protect its citizens and to ensure their rights on its territory. The state protected the citizens who in turn respected the laws and paid taxes (Szabó 2013). One can divide citizenship into four dimensions: legal status, rights, political and civil participation in society, and a sense of belonging (Bloemraad 2008: 154).

On the legal level, one can become a citizen based on the principles of ethnic origin (jus sanguinis) or/and birth on the territory of the state (jus soli). Naturalization was introduced for residents who were not born in the country. Citizenship has political and civil dimensions, too. Citizens can vote and elect their representatives and minors and foreign residents are given opportunities for participation in other fields of political and civil life. On the psychological level, citizenship furthers the individual's sense of belonging to and identification with the state. It is an important element of social cohesion in today's societies (Weil 2011). The citizen becomes the member of an 'imagined community' which was constructed out of cultural traditions that make up the nation-state (Anderson 1983).

Nation is a central element throughout Europe. The definition of nation, of who belongs to the national community is the key to understanding the citizenship policies that nation-states pursue. Historically, European nation-states engaged in nation-building and established the social cohesion needed to engender loyalty toward the state. 'Belonging' is central to nation-building throughout Europe. All Europeans belong to a nation, some to two or more nations, but there are hardly any individuals who are nationless. Over 99% of all human beings are citizens of a nation-state and possess passports or national IDs that confers upon them a legal status (Weil 2011, Kántor 2014). The situation of statelessness is conceived of as temporary, and individuals as a rule strive to be citizens of a state that can protect them. Possessing a citizenship, being the member of a political community which protects the individual means the possession of basic rights or, as Arendt put it, the 'right to have rights' (Arendt 1973: 230–231). 'At a practical level, without institutions such as courts and policing apparatuses, it is unclear how rights can be guaranteed absent a state-like structure' (Bloemraad 2008: 164). For Seyla Benhabib, the 'right to have rights' encompasses the universal human rights of refugees to gain entrance into nation-states through 'porous borders' even if they are not citizens. The question is how these rights can be implemented since nation-states regard it as their sovereign privilege to decide whom they admit as migrants and to whom they grant asylum. They also differentiate between citizens and residents who do not have full citizenship rights. Benhabib advocates the establishment of different models of nation-state under which a nation-state accepts restrictions on its sovereignty (Benhabib 2004).

New Citizenships

The view of citizenship as loyalty, identity, and territorial authority, which form a tight unit dating from the 19th century, underwent fundamental changes in the twentieth and twenty-first centuries. The international legal development of the past 20 years transformed the relations of the nation-state to its citizens, reducing

the use of citizenship policy to create a homogeneous mono-cultural society. Thus, the traditional nation-state, united in the trinity of the nation, its territory, and the state, cannot serve as the only basis for analysing citizenships in the 21th century (Csergő 2000, Csergő–Goldgeier 2007).

The principle of territorial sovereignty, which has dominated the international system since the Peace of Westphalia in 1648, has been weakened through the processes of globalization, migration, and regionalization. Alternative forms of organizations emerged, which sought to replace the Westphalian system of sovereign states. New supranational institutions and the institutionalization of human rights increasingly question the sovereignty of the nation-state.

The possibility to travel has become available to an ever-widening range of people as more and more people moved outside their native countries in search of jobs. The freedom of movement, patterns of migration, and the availability of information through the Internet moved the world towards new types of citizenships. These include, among others, supranational, global, transnational, and post-national citizenships. Some scholars advocate citizenship in sub-national territorial units as a way of furthering the participation in public life of those who live there regardless of nationality and citizenship. This would involve the de-linking of national and local citizenship (Held 1995, Pogge 1997).

One example of the new type of citizenship is the European Union citizenship, which allows citizens of the EU to vote in their place of residence. A growing number of citizens live and work outside their homeland in the European Union, which has become a supranational institution for EU citizens (Szabó 2013). The EU created a special legal community in which EU citizenship connects the 500 million citizens of the EU member states. Bauböck describes this special status of EU member states as 'denizenship' (Bauböck 2005). Under this form of citizenship, a person who lives in another EU member state has almost the same political and civil rights as the citizens of the host state. Those EU citizens who settle in another EU state can participate in the local and EU elections. Except for the right to participate in national parliamentary elections, they have full rights. Under these arrangements, national citizenship has lost much of its meaning (Szabó 2013: 143 in Papp 2014).

Scholars also identify the category of global citizenship. This encompasses persons who give preference to ties with national organizations such as Amnesty International or Greenpeace over ties to a national community (Bloemraad 2008: 166).

Bauböck introduces the concept of stakeholder citizenship, under which citizens are those who have a stake in the polity's future because of the circumstances of their lives, that is, through their ties to a country where they are deeply involved in political life. This concept is directed toward Western countries which absorb a growing number of immigrants and face difficulties

in the integration of the newcomers. It supports the granting of citizenship to immigrants to enable them to participate in the collective decision-making process. Under stakeholder citizenship, both immigrants and emigrants who live outside the country should be granted citizenship, and the states should respect the individual's decision to give one affiliation priority (Bauböck 2007: 242).

Dual Citizenship: from Rejection to Acceptance

Rejected by many countries well into the 20th century, dual and multiple citizenships became accepted throughout the world as a result of global developments (Schöpflin 2003). Dual citizenship came to play a key role in the emergence of transnational and deterritorialized identity structures (Bauböck 2007).

In the nineteenth century, the idea that a person could be a citizen of two or more states was strongly rejected because of the conviction that those living on the territory of a sovereign state can only belong to that state. In 1849, US Ambassador George Bancroft likened dual citizenship to bigamy. In his view, one should 'as soon tolerate a man with two wives as a man with two countries' (qtd in Koslowski 2000: 206). In 1930, a League of Nations convention declared that everyone should have only one nationality (Blatter 2011: 771, Spiro 2010: 111–130). There was a great deal of mistrust toward persons aspiring to be dual citizens, and the taking up of the citizenship of another state resulted in most cases in the loss of the other citizenship. The assumption was that a person could not be loyal to two states and was playing a double game.

This attitude of rejection underwent major changes especially on the European continent. The peace treaties following World War I and World War II changed the borders for millions of people, and many found themselves as minorities on the territories of newly formed states. The incongruence between nation-state and territory has greatly increased. In Western Europe, an increasing number of migrants could obtain double citizenship.

With the disintegration of Yugoslavia and the Soviet Union, borders changed again as new states were created, and millions of people lost their citizenship. Many former Soviet citizens settled, for instance in the Baltic States, were denied citizenship in the newly formed states. Over one million Russians took advantage of Russia's offer of citizenship to them. These developments promoted the dilution of the classical meaning of citizenship consisting of the nation-state with a well-defined territory for its nationals.

The European Convention on Nationality (adopted in 1997) was a major breakthrough for the acceptance of multiple citizenship. The Convention promotes the de-ethnicization of citizenship by forbidding differentiation between citizens on the basis of national or ethnic origin as well as religion, race,

or skin colour. A country can, however, pass legislation that makes it easier to acquire its citizenship for those who belong to it culturally, linguistically, or on the basis of ethnicity. The Convention stated that '[e]ach state shall determine under its own law who are its nationals' and that 'each state is free to decide which consequences it attaches in its internal law to the fact that a national acquires or possesses another nationality'.[1]

This meant that as long as laws regulating access to citizenship harmonize with international agreements, international common law and recognize principles of law, states have a wide-ranging freedom to decide whom they regard as their nationals. States adopted a great number of different approaches to citizenship policy as they set the criteria for determining whom they regard as their own citizens. They granted citizenship to their non-resident nationals and passed legislation that lays down the rights and obligations (Szabó 2013).

The Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations issued by the High Commissioner on National Minorities of the Organization for Security and Cooperation in Europe in 2008 made clear that ties to a national community were also grounds for granting multiple citizenship.[2] Under the recommendations, the state could take into account historical, cultural, family ties as well as linguistic affinities when granting citizenship to those who live abroad (Szabó 2013: 134). Patrick Weil argues that as states gave up their mistrust of dual citizens, they turned to 'forging an alliance with those possessing multiple nationalities. Dual citizens are part of the strategy of nation-states in a globalised world.' States increasingly regarded dual or multiple citizens as 'possible transmitters of national values and interests abroad. In a globalised world, they can become agents of state influence overseas, diffusers of the national culture or interest, and part of a global network' (Weil 2011: 631).

Nation and State in Citizenship Conceptions

Eastern and Western conceptions of national citizenship vary because of the different historical experiences of the two regions, which shaped their definitions of whom they regard as members of the nation. Historically, the state and the nation are interconnected, regardless of whether the nation developed in an already existing state or whether the state was formed around an already existing nation. Czech historian Miroslav Hroch points to the different legacies of Western and Eastern and South-Eastern Europe in nation-building. Western nations were products of a long process of nation-building that reached back to the Middle Ages.

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1   http://conventions.coe.int/Treaty/en/Treaties/Html/166.htm.
2   The Bolzano/Bozen Recommendations on National Minorities in Inter-State Relations (OSCE HCNM 2008).

Here, the national movements of the 19th century took place under constitutional conditions and at a time when capitalism began to take roots. Nationally relevant conflicts could find an expression in political terms. In the West, the nation was usually formed in a state framework, and the concept of citizenship is derived mainly from birth on the territory of the state or naturalization. This conception of citizenship regards citizens as members of civic communities who share common political values, respect the same institutions, and live on the same state territory. In Eastern and South-Eastern Europe, nation-building began around 1800. The elite groups lacked political experience and articulated conflicts in national categories (Hroch 1985). They mobilized the nation around ethnicity before the state was formed, and the ethnic origin (jus sanguinis) principle was given priority. Mobilization around ethnicity was necessary to achieve national independence from the empires in which the nations were incorporated. Membership in the nation was defined in ethno-cultural terms, taking common descent and heritage as its basis. As many nationalities in Eastern Europe became minorities in their historic native land following wars and the disintegration of empires, the ethno-cultural recognition came to play a key role in the conceptions of citizenship (Kohn 1944, Meinecke 1962).

National traditions also play a great role in Western Europe in what type of citizenship policy is adopted. France has dealt with migrants according to the republican principle of granting citizenship to those born on its territory, which arguably offered them a greater chance of inclusion but also required them to abandon their culture and refused to recognize them as ethno-cultural groups. Other Western countries, such as the Netherlands, accept cultural pluralism, and small groups of minorities can maintain their unique cultural identities.

Germany's 'policy on aliens' (Ausländerpolitik) was until recently strongly shaped by an ethno-cultural notion of national identity and citizenship. In 2000, Germany gave up its strict commitment to single citizenship to further the process of integration of the Turkish minority. Children born in Germany to immigrant parents can have dual citizenship but must give up foreign citizenship between the ages of 18 and 23 in order to retain their German citizenship.[3] Migrants arrived in Germany as guest workers in the 1960s and were joined by many others who fled economic deprivation. Similarly to other Western countries, Germany had increasing problems with integrating the migrants, especially the second and third generations (Koslowski 2000). Regardless of the approaches taken toward migrants, Western countries with large Muslim populations had to grapple with problems of integration.

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3   http://www.auswaertiges-amt.de/EN/EinreiseUndAufenthalt/Staatsangehoerigkeitsrecht_node. html.

Nationalism and Revival of the Nation

In Eastern and South-Eastern Europe, where ethnicity historically played a prominent role, a revival of the nation took place following the collapse of communism as people in a newly democratized Eastern Europe sought to reconstruct their ethnic identity. This inevitably caused tensions especially in the regions where the boundaries of the state and nation were not congruent. Some nations were even prepared to go to war for ideals that claimed to protect their ethnic identity (Harris 2009: 172–175, Linz–Stepan 1996, Kymlicka–Opalski 2001).

I use the concept of nationalism as a framework to explain the revival of the nation and the citizenship policy of Eastern European nations. According to my definition, nationalism is a social process that seeks to organize and institutionalize society along ethnic lines. Nationalism was swept under the rug during communism and erupted with great force with the advent of democracy. In post-communist Europe, nationalism serves as one of the fundamental organizing principles of nation-states that proved to be the most important nation-building force. Political actors engaged in nationalism seek to create and maintain the cultural identity of the nation or the national minority by institutionalizing societies on a national basis. Nations, majority, and minority pursue their own nationalizing projects to preserve their identity and culture. The efforts of the kin-state to support its ethnic kin and to establish a legal or political relationship to them by granting them citizenship is a reflection of nationalism (Kántor 2014).

Most Western scholars had not anticipated a national revival following the collapse of communism and the measures of nation-states to help their co-nationals retain their identity. They assumed that nationalism died out under communism and predicted a post-national wave following the democratization of the 1990s, which would transform the identities of populations and make the assimilation of ethnic minorities easier. The international community was not prepared for the ethno-national resurgence either. Neither the EU nor international organizations succeeded in formulating clear norms relating to kin-state action and minority rights protection (Schöpflin 2003).

Dual Citizenship: Integration and Nation-Building

In Western Europe, double citizenship is seen primarily as a measure to help the integration of migrants and to enhance the well-being of citizens by, for example, enabling them to live in different countries and to participate in political life. The political or civic concept of the nation as a group of people living together on a territory regardless of nationality was strengthened as a growing number of nation-states allowed migrants to become naturalized citizens based on extended

residence and/or birth in the country rather than filiation. Citizenship based on the principles of ethnic origin or on birth on the territory of the state was increasingly merged. Human rights became separated from the formal citizenship status and membership, and the fundamental rights of a person were not tied to the formal citizen status but to his or her person or residence status (Bloemraad 2008: 154).

The issue of migrants' rights to citizenship in the countries where they lived, often over several generations, was presented by most of the scholarly community as their individual human rights. The political concept of the nation was strengthened as an increasing number of nation-states allowed migrants to become naturalized citizens based on extended residence and/or birth in the country rather than filiation. This led to a merging of citizenship based on the principles of ethnic origin and birth on the territory of the state.

The human rights approach represented a challenge for autochthonous minorities because it focused on individual rights instead of the collective rights needed for the reproduction of their communities. The Western approach also generalized the problems of minorities and failed to take into account that there are differences between the status of minorities who came out of their own free will as migrants and those who stayed in their homelands and the borders moved around them. (Thus, the issue of the establishment of a Hungarian-language university in Transylvania was linked to the setting up of a Turkish university in Berlin.)

Rainer Bauböck defined citizenship that reaches across the borders as transnational citizenship (Bauböck 2003). Transnational citizenship is conceived of as deterritorialized citizenship, which transcends territorial boundaries and allows large groups of people to be citizens of several states. In Western literature, migrants and the sending and receiving states are identified as the forces behind transnationalism (Leggewie 2013). According to scholars, transnational citizenship represents a modern meaning of 'belonging' where national, social, and individual forms of identity are combined (Blatter 2010). Voting rights for non-residents serves as an example of how citizens share their identities and allegiances. Iván Halász speaks of the transborderization of elections, which has reached the Central European region and involves not only the migration of electors but also that of elections and election mechanisms.[4]

Transnational citizenship has also spread to Eastern Europe, but here citizenship was used as a tool of nation-building across state borders. Bauböck designated the rights given by the kin-state to the ethnic kin abroad such as quasi-citizenship or citizenship as ethnizenship because it is 'generally granted to minorities on the basis of ethnic descent and perceived common ethnicity with an external kin state' (Bauböck 2007: 2396). In contrast to the migrants in Western Europe, ethnic kin or autochthonous minorities outside the borders of the kin-

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4   https://www.jus.uio.no/english/research/news-and-events/events/conferences/2014/wccl-cmdc/wccl/papers/ws6/w6-halasz.pdf.

state did not leave their places of birth voluntarily and retained their loyalty to the kin-state. Autochthonous minority communities were able to define their identity ethno-culturally and sought the help of the kin-state in reproducing their identity. A growing number of kin-states crafted legislation that granted financial aid and preferential treatment to their ethnic kin. Many kin-states used double citizenship with non-resident voting rights as a tool for nation-building that strengthens not only the identity of the ethnic kin but also the social cohesion of the kin-state. Numerous scholars welcomed double citizenship for migrants in Western Europe but rejected it for autochthonous minorities in Eastern Europe (Kymlicka–Opalski 2001).

For many Eastern European minorities, gaining the citizenship of the kin-state was a long-awaited recognition of their ethnic identity and a support for their communities. One could define the citizenship policies of post-communist states as attempts at state-building where the nation serves as the constitutive principle, and the great variety of kin-state legislation reflects the differences in how the states relate to their co-nationals abroad. As Irina Culic puts it:

> Broadly speaking, citizenship policies in post-communist countries have been the result of individual and competing state-building processes: political elites were constructing both internal and external boundaries for the newly formed or redefined states. As such, constitutional provisions regarding kin living abroad, and citizenship legislation provisions regarding dual citizenship for non-resident co-ethnics were expressive of various visions of the states, and their political, symbolic, and territorial grasp (Culic 2009: 20).

The states used double standards in their approach to dual citizenship by offering it to their ethnic kin but criticizing other states for doing the same if their co-nationals lived on their territory (Culic 2009).

The idea of using citizenship as a tool of nation-building across state borders has precedents in Western Europe. Austria's 1979 law toward German speakers in South Tyrol and Ireland's policies in Northern Ireland are well-known examples. The West German state granted preferential naturalization to ethnic Germans requesting 'repatriation' during the decades of communism. Israel followed a similar policy toward Jews from Ethiopia or from then communist countries. In addition, citizenship to non-residents is a widespread international praxis and has also been adopted by some EU member states such as France, Germany, Spain, and Sweden (Tristan et al. 2013).

Trans-Sovereign Nationalism

Zsuzsa Csergő used the concept of 'trans-sovereign nationalism' to describe the policy of the kin-state which reaches across existing borders to its ethnic kin and seeks to help it maintain its ethnic identity (Csergő 2000, Csergő–Goldgeier 2006). Under trans-sovereign nationalism, the kin-state seeks to reconstitute the nation across the borders and achieve 'national reunification' without changing the borders. The Hungarian government adopted a 'trans-sovereign strategy' because the options of building a classical nation-state or the repatriation of ethnic Hungarians were judged as unrealistic. The idea of border revision was not an option in the current international order; the 'velvet divorce' of Czechoslovakia and the Baltic States' regaining independence were the exceptions. Szabolcs Pogonyi summarizes the strategy of the Orbán government toward the ethnic kin as the 'national reunification beyond the borders in the rhetoric framework of a borderless Europe, in which individuals may cultivate transnational ties and minority rights (including cultural and territorial autonomy) /and/ are safeguarded by international treaties' (Pogonyi 2015).

However, the home states where ethnic Hungarians live, reject the idea of 'reunification', the 'spiritualization', or 'virtualization' of the borders, qualifying these as interference in their internal affairs. The home states where Hungarian ethnic kin live are, with the exception of Romania, new states, which were established or regained their sovereignty after decades of communism. The home states see in Hungarian trans-sovereign nationalism a challenge to their territorial sovereignty. Irina Culic expresses the fears of the home states:

> Dual citizenship for members of the 'people'/ nation abroad is conceived here as the most appropriate way of protecting their cultural identity, way of life, and interests within the home state, and ensuring their thriving outside the borders of the nation-state. In such situations, dual citizenship provides an avenue for direct intervention over non-resident co-ethnics, and formalizes an encroachment of one state over the national policies of another state (Culic 2009).

One of the challenges is to harmonize the principles of state sovereignty with nation-building across state borders. The kin-state, the home state, and the minorities are the major actors in this process. The EU acted as a mediator between the three actors and had the power to influence the policy toward minorities because all post-communist states sought to comply with EU norms in order to gain entrance to the Union. Home states agreed to give up part of their sovereignty to the EU and were prepared to make some concessions on granting minorities more rights in order to join the EU (Kymlicka–Opalski 2001).

Political Nation versus Ethno-Cultural Nation

The Hungarian dual citizenship to the ethnic kin abroad sparked debates not only in the home states but also in Hungary. In contrast to other Eastern European countries which implemented similar measures, in Hungary, there is no consensus among the political elite over granting double citizenship to the ethnic kin and the role of the kin state in representing the interests of Hungarian co-nationals. This debate revolves around who belongs to the Hungarian nation and has been going on since the beginning of the twentieth century (Gyurgyák 2007). Under communism, the issue of nation and ethnic Hungarians was hardly discussed in public. After the collapse of communism, the Hungarian government and public was confronted with the fact that the large number of Hungarians who live outside the country's borders claimed their minority rights and turned to the kin state for help in maintaining their ethnic identity (Bárdi 2004).

The current debate over granting double citizenship illustrates the clash in Hungary over the political and the ethno-cultural views of the nation. The issue of who belongs to the nation was swept under the carpet under communism and re-emerged under democratic conditions. Bárdi divides the conflicting discourses surrounding membership in the nation into 'anti-national' and 'national' attitudes and identifies their roots in the conflicts between Hungarian political camps that emerged following the democratization. Bárdi sees no prospect for a consensus between the two sides in the foreseeable future because in his view the discourses run parallel and create cohesion in the respective political camps (Bárdi 2004, Bárdi 2013).

The left liberal political elite objects to granting the ethnic kin double citizenship on the ground that they do not live in the country and should not be involved in taking decisions that affect the population in Hungary. They regard the ethnic minorities as citizens of the country where they live and hold their home state responsible for improving their lot (Pogonyi 2011, Egry 2010).

Under this view, good neighbourly relations have priority in bilateral relations, and the Hungarian state must negotiate with the home states before taking measures affecting the status of the ethnic minorities who live on their territory. The conservative political camp views the ethnic kin as integral part of the Hungarian nation, whose rights should have priority in bilateral relations to the home states. On the issue of double citizenship, conservatives opine that it is likely that even home states which have similar legislation toward their ethnic kin would have rejected it for ethnic Hungarians because of deep-seated suspicions over Hungarian intentions.

In the debate over double citizenship, many Hungarian scholars expressed approval for the double citizenship for migrants but not for their ethnic kin abroad (Búr–Baky 2005, Pogonyi 2011, Blokker–Kovács 2015). They regarded

double citizenship to migrants as a positive step toward the de-ethnicization of citizenship. Blokker and Kovács expressed the hope that double citizenship to migrants would decrease 'nationalistically informed, closed attachments to majority groups and their culture' and reflect 'a more cosmopolitan, open understanding of citizenship'. They warned that in the case of ethnic minorities 'dual citizenship can equally be related to forms of re-emphasising national, state sovereignty of the closed, modern, and Westphalian kind and legal pluralism can relate to attempts to extend a sovereigntist logic beyond state borders in an attempt to deterritorialise but also increase nationalistic forms of sovereignty' (Blokker–Kovács 2015: 2).

Hungarian ethnic kin in neighbouring countries adopt as a rule the ethno-cultural view of the nation and stress that while they are citizens of the home state they belong to another nation culturally. In their view, under the political concept of the nation, they are not allowed to decide which nation they belong to based on their cultural heritage, and, instead of that, others decide for them what their citizenship is based on. If this is correct, Swedes in Finland, Catalans, and many other nationalities exist only as part of the political nations where they live, and their minority rights have no foundation. Yet, nationalities are recognized and have rights in most countries of the European Union (Öllös 2006).

For ethnic Hungarians in neighbouring countries and for ethnic minorities in general, the key issue is that they do not have equal chances with the majority to succeed in their home state and cannot reproduce themselves as a community. Ethnic minorities point out that home state legislation favours the majority, and the minority does not have group or collective rights that would allow them to have a say in legislation concerning their cultural and educational life (Öllös 2006).

Many ethnic Hungarians in neighbouring countries regard Hungarian citizenship and voting rights as a historical compensation for the injustice they suffered at the hands of the majority of the state where they found themselves. Surveys and statistics indicate that the majority of ethnic Hungarians welcomed double citizenship. Close to 800,000 ethnic Hungarians applied for Hungarian citizenship by the end of 2015, mostly from Transylvania. By August 2015, over 700,000 took the oath of citizenship.[5] The reasons for taking up Hungarian citizenship varied from possibilities to travel and work abroad for those whose home states are not members of the EU to a sense of belonging to the kin state. For many, Hungarian citizenship gave recognition to their ethnic identity and a sense of security towards the home state (Pap 2014).

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5   Deputy PM: the number of applications for Hungarian citizenship expected to reach 800,000 by the end of the year. 15 August 2015, Hungary Today: http://hungarytoday.hu/news/deputy-pm-number-applications-hungarian-citizenship-expected-reach-800-000-end-year-25751. 5 August 2015, MTI: http://dailynewshungary.com/semjen-encourages-ethnic-hungarians-in-west-ukraine-to-take-citizenship/. 31 December 2015, Interview with Zsolt Semjén, Radio Kossuth.

Majority and Minority

The key question of citizenship policy in both Western and Eastern Europe is to find ways how majority and minority can live together in a way that the rights of both sides are respected. Scholars identified two key approaches that can facilitate the peaceful co-existence of majority and minority. One arrangement can be defined as integrative and the other as consociational. The integrative approach aims to reduce ethnic cleavages and increase interaction between majority and minority. Here competition takes place along non-ethnic lines. The consociational approach, on the other hand, seeks to institutionalize ethnic cleavages and limit the interactions to the political elite. In this way, majority and minority can have their parallel societies, which can serve as the pillars of society. It was Arend Lijphart who set up the theory that forms the basis of these studies, who envisioned a consociational or power-sharing model of democracy for societies where deep divisions were present. Such a power-sharing model could be successful if 1.) the elite is willing to put its difference aside and enter a grand coalition; 2.) the right of mutual veto is accepted; 3.) if society is willing to accept the depoliticization of various segments and institutions; 4) the acceptance of proportionality; 5) granting autonomy to different groups (Daalder 1974, Lijphart 1996).

Hungarian ethnic parties opted for consociational power-sharing by participating in the majority government. The problem is that the structural and institutional guarantees needed for consociationalism are missing, and thus only the first requirement listed by Lijphart is fulfilled. In the absence of such guarantees, minority rights are subject of political deals between minority and majority and can easily be taken away. For this reason, one can describe the motto of the arrangement between minority and majority in this case as 'moderation through inclusion' because ethnic Hungarian parties tended to moderate their demands for more minority rights when they participated in the majority governments (Székely 2014).

In Western Europe, governments tend to opt for the integrative approach, which aims to reduce ethnic cleavages and increase interaction between majority and minority. Here competition should take place along non-ethnic lines. This is, however, very difficult to implement. It depends on the willingness of the minority to give up its ethnic characteristics. In most Western countries, migrants created their own parallel societies and had no wish to fully integrate into the majority society. This was even promoted by scholars, who interpreted this as multiculturalism and welcomed it as a way of life where each nationality can hold on to its separate traditions. Questions about the success of this approach were raised in the early 2000s, when studies showed that the second and third generations born in Western Europe were less integrated than their parents and could hardly speak the language

of their host country (Egedy 2016). The lack of language skills and education placed many of these migrants in a socially disadvantaged position that left them perceptible to extremism (Bodemann–Yurdakul 2006).

Whither Nation-State?

Many Western scholars opine that the nation-state is on the decline and will disappear in time (Joppke 2006, Leggewie 2013). The role of the nation-state and national citizenship are hardly taken into account in studies of globalization and transnational migration. Voices that express doubts about the imminent death of the nation-state are ignored as a rule by the dominant narrative, which considers these voices unscientific. The nation-state is deemed as something antiquated and is mentioned with the prefixes like 'post-', 'trans-', and 'supra-' to indicate its decline. Predictions about the demise of the nation-state go hand in hand with the legitimacy crisis of 'nationality' and of national state citizenship (Pogonyi 2011). As Patrick Weil formulates it: 'Nationality is said to have been undermined both by external competition from other affiliations (sub-, trans-, or supranational, ethnic, religious, gender-related, etc.) and by its own inegalitarian qualities' (Weil 2011: 615).

Studies about the demise of the nation-state are closely linked to issues relating to the rights of migrants. Scholars focus on the rights of migrants to political participation and citizenship and put pressure on nation-states to implement changes in the criteria of granting citizenship and voting rights. They used the international human rights regime to argue against the claims of nation-states to control access to their territory (Joppke 2005).

A favourite topic of post-national projects is the 'liberation' of citizenship from nationality. Scholars suggested that the nation-state should give up its ethnic character and act as a neutral mediator between majority and minority (Joppke 2006). Joppke defines 'de-ethnicization' 'as the process of facilitating the access to citizenship, either through opening it at the margins in terms of liberalised naturalisation procedures or through adding jus soli elements to the modern main road of birth-attributed citizenship jure sanguinis' (Joppke 2006: 69). Joppke names two basic conditions that have to be met for the 'de-ethnicization' of the state to take place: 'first the decoupling of the state from nation-building; second, the existence of a political force, usually on the left, to wage a reform that promises few if any votes'. He recalls the importance of a 'self-limiting' understanding of nation-building in a liberal state', under which 'liberal norms constrained what states could do in the domain of immigration and citizenship policy' (Joppke 2006: 70, Kymlicka 2002).

In contrast to the efforts by liberal scholars to de-ethnicize citizenship, the kin-states where migrants come from are more interested in re-ethnicizing citizenship.

They tend to allow their emigrants to keep their citizenship when they naturalize elsewhere because this allows them to retain ties with their ethnic kin and reap the material and political benefits from it. While the de-ethnicization trend concentrates on the territorial nature of the state, 're-ethnicization cuts across the "ethnic versus civic" distinction known from the nations and nationalism literature, as it is grounded in the ascriptive membership component of the state' (Joppke 2006).

The idea that citizenship should be liberated from nationality and a new form of citizenship based on human rights should be introduced is very controversial among the public in both Western and Eastern Europe and reflects the politicization of the topic of citizenship policy. The approach to citizenship as a human right would have wide-reaching implications for citizenship policy toward the ever-growing migrant population. There is also a debate in Western Europe about who should be regarded as a member of the national community and be granted citizenship (Greenfeld 1992, Hobsbawm 1992, Hroch 1985).

There is a cleavage between the views of the scholarly community and popular opinion in many Western countries faced with massive migration. Scholars tend to adopt the civic-territorial or political view of the nation, while citizens concerned about a weakening of national traditions stress the ethnic-cultural. Joppke represents the views of many scholars as he declares that 'the political process in electoral democracies is endemically vulnerable to the populist pressure of majority opinion' (Joppke 1999: 18 qtd in Culic 2009).

Other scholars, such as Weil, argue that the crisis of the nation-state and citizenship is exaggerated. Weil even detects 'a new vitality' of national state citizenship in the face of globalization and technological development and asserts that 'a new strategic collaboration between the individual and the state has emerged as their interests have converged' (Weil 2011: 615, Hansen 2008). He comes to the conclusion that 'for the time being, national citizenship remains strong, and not only in the European Union. Indeed, citizenship remains the sole basis of certain rights – international protection, right of repatriation, political participation, and protection against expulsion – without which the individual would be denied fundamental entitlements' (Weil 2011: 617).

Conclusions

An analysis of the citizenship policies in Eastern and Western Europe showed that the two regions differ in how they define membership in the community. The role of the state and the nation in establishing social cohesiveness is a major difference that has historical roots. In Eastern Europe, the nation was formed first and the state was built around it, which gives the nation a prominent role.

In Western Europe, the state plays a greater role than the nation because state-building took place mostly before or concomitantly to nation-building. Following wars in the twentieth century, many nations in Eastern Europe found themselves as minorities in neighbouring countries. After decades of communist rule, the nation had to be reconstructed in Eastern Europe, and many countries are still engaged in simultaneous nation- and state-building. Western Europe did not experience communism and came to great economic prosperity. In the 1990s, at the beginning of the democratic transformation in Eastern Europe, well-functioning democracies were already in place in the West. Western Europe grappled with the integration of millions of migrants who settled there and sought to promote their integration by granting them citizenship. In Eastern Europe, most countries offered citizenship to their ethnic kin in neighbouring countries in order to help them protect their ethnic identity. Thus, while the West moved towards the direction of de-ethnicizing citizenship in order to integrate migrants, in Eastern Europe, citizenship was used to strengthen the identity of the nation by granting citizenship to ethnic kin across the borders. In the West, a major group of scholars designated the nation-state as outdated and promoted citizenships that transcended it. According to this view, the state had to give up its ethnic character and act as a neutral mediator between majority and minority. Thus far, however, no state in Western or Eastern Europe shed its ethnic character, and many European countries seek to retain their national heritage. The experiences of autochthonous minorities confirm that the nation-state has not given up its ethnic character and does not function as a neutral mediator between minority and majority. The nation-state promotes the history and culture of the majority in education and language policy. The debates on collective rights, autonomy, and language use make it clear that the nation-state represents the interests of the majority and builds the majority nation-state at the expense of the minority. Thus, one can conclude that while the autonomy of the nation-state has been curbed as a result of recent global developments, nation-states have an important role to play in representing the interests of their citizens and ethnic kin as well as in shaping the process of globalization.

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Understanding the Narratives Explaining the Ukrainian Crisis: Identity Divisions and Complex Diversity in Ukraine[1]

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Abstract. The central argument of this paper is that radical and opposing interpretations of the Ukrainian conflict in politics and media should be studied as offspring of broader narratives. These narratives can be better understood by examining the national identity of Ukraine. Since Ukrainian national identity shows a high degree of diversity, it offers a rich source of arguments for any party wanting to give an interpretation of the present Ukrainian crisis. Narratives explaining the crisis often ignore this complex diversity or deliberately use elements from it to construct the 'desired' narrative.

Firstly, this paper defines four overarching narratives used in the current debate: the geopolitical, the nationalist, the structuralist, and the legal narrative. Secondly, this paper shows how various interpretations fitting within these narratives are all one way or another related to the divisions dividing Ukraine's complex national identity. Examining the underlying divisions helps to explain the appeal of differing interpretations of the conflict in the West, Ukraine, and Russia. Especially the nationalist narrative and geopolitical narratives show how the complexity of Ukraine's national identity is deliberately used to construct a narrative.

The combined study of constructed narratives and Ukrainian national identity thus provides valuable material for any scholar or policymaker looking for a deeper understanding of the situation in Ukraine amidst a confusing information war.

Keywords: Ukraine, national identity, language policy, regional identity

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1. Introduction

1.1. A Range of Arguments

Is Ukraine, a 'fascist-ruled state suppressing its Russian minority' as some Russian media state? Or is it 'a corrupt state with a dysfunctional economy ruled by extremists' as was put forward by opponents of the EU–Ukraine association treaty in the Dutch referendum campaign? Or is it a victim of geopolitics and weaknesses in international law as some observers of international relations and international law put it? These are just a few of the numerous, often conflicting characterizations of the Ukrainian crisis, which evolved after the rejection of the agreement between the EU and Ukraine by President Yanukovych, the subsequent Maidan revolt, and the continuing political and military upheaval in Crimea and Donbass.

In the information war (Voswinkel 2014) erupted soon after the Maidan protests started, Russian government officials tended to portray the events in Kiev as nothing less than a fascist coup d'état, orchestrated by Western powers, with the intention of undermining the position of Russia. This discourse was taken over by state-controlled or -subsidized media, such as Russia Today (Starink 2015: 232, Geisbuhler 2014: 21). A geopolitical narrative was constructed, in which Western powers were portrayed as untrustworthy and insensitive towards Russia's position in the world and its 'justifiable interests'. The West actively supports regime change and ultimately wants regime change in Russia (Katz 2015: 58). Signs of Russophobia, especially in countries formerly part of the Soviet Union, were brought to the attention of the public in Russia and led to an additional nationalist narrative in Russian media about the suppression of Russia and glorification of Russian historical achievements. The provisional Ukrainian government, which took office after Maidan, was labelled as fascist, anti-Russian, and nationalistic. In Russian media, its supporters were portrayed as villains and NATO puppets. This narrative also made its way to Western media and more radical political parties in the West on both sides of the political spectrum (Hausmann & Penter 2014: 39). In turn, leading Maidan politicians depicted Russia as an imperial aggressor led by a dictator and pursuing a neo-Soviet policy that is patronizing towards former parts of the Soviet Union with a Russian minority (Bomsdorf: 2015).

In Ukraine, following the geopolitical frame, Russia was portrayed on social media, such as Vkontakte and Facebook, as an aggressive, imperial power. It was frequently claimed that Russia ignores international law and is opposed to a truly independent Ukrainian state (Wilson 2014: 68–70). Ukraine added a new narrative, that of the international legal order. This narrative also stressed the autonomous internal development of Ukraine, away from corruption and Soviet legacies, towards 'the European model'. Each new argument provoked a

counterargument from the other side, which led to a confusing and clamorous debate. This so-called 'information war' has fuelled the conflict, which has become a dangerous mixture of nationalism, political psychology, geopolitics, economic considerations, and perceived national interests. It is therefore hard to separate facts from constructed narratives.

1.2. Overarching Narratives and National Identity

This working paper proposes a clarifying framework to interpret these arguments because conflicting arguments and disinformation may lead to oversimplifications in public debate and distrust in political communication (Pesenti & Pomeranchev 2016: 2–5).[2] First, this paper identifies four frequently used overarching narratives: the nationalist, the geopolitical, the structuralist, and the legal narrative. This typology is based on research into existing narratives about Ukraine's national identity (Korostelina 2013) and secondary literature describing the positions of Russia, Ukraine, and others in the conflict (Smeets 2015, Wilson 2014). The aim of this paper is to understand how these narratives are constructed and why they are successful. In order to address this question, this paper explores the relationship between the four overarching narratives and different manifestations and interpretations of Ukraine's national identity.

1.3. National Identity as Explanatory Variable

Ukraine's complex national identity is a wellspring of various competing narratives (Korostelina 2013). This paper will argue that images and constructed identities play a crucial role in the narratives used to mobilize support for the different positions in the conflict. Scholars addressing the on-going Ukrainian conflict often fail to address the complex national identity issues in Ukraine. This is a missed opportunity since historical experiences continue to shape the behaviour of political elites in East-Central Europe (Subtelny 2011: 20). In addition, national identity shapes the receptivity of their public to different narratives. Memories of humiliation and heroic struggles in the process of national identity formation remain prominent in East-Central Europe. A viable independent Ukrainian state was not realized until 1991 after centuries of being part of the Habsburg and Russian empires and the Soviet Union. Hence, the formation of a Ukrainian nation-state is still in its early phase and historic and societal divisions are still very tangible.

In the case of Ukraine, many authors (Pirie 1996, Janmaat 2000) have pointed out the relevance of various types of self-identification (e.g. mixed, Russian,

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2   Since the start of the conflict, private and public initiatives, such as stopfake.org, have been taken to counter fake news or to communicate with Russian speakers, such as EU-funded TV channels and an Estonian state television channel in Russian.

Ukrainian, other), the effects of mixed marriages as well as the importance of historical roots of competing identities and their impact on visions of Ukraine (Riabchuk 2012). The interaction between national identity and foreign policy is particularly important in newly emerging or re-emerging states because nationalism and national identity are the main centripetal and centrifugal forces (Prizel 1998: 2). The fragmented Ukrainian national identity in no small part determines its international behaviour (Molchanov 2002: 280). Shulman (2004) found that national identity has an impact on political attitudes. Therefore, a closer examination of national identity is conducive to understanding the narratives used in the information war. It reveals the deep historical roots of political fragmentation (Molchanov 2002: 188). History and its interpretation are important explanatory variables for political behaviour in East and Central Europe (Hausmann & Pentner 2014: 46). The examination of Ukrainian national identity will also compensate for the lack of attention for Ukraine because it was considered more important by the West than Russia and as an impediment to attempts to improve relations between Russia and the West (Jansen 2014: 171, Portnov 2014).

1.4. Narratives

In an information war, both sides use radical interpretations and (over) simplifications to convey their political message. Not surprisingly, contentions in the information war are often diametrically opposed. A factual assessment of some of these contentions has already been made by Andrew Wilson (2014) and Yekelchyk (2015). This paper treats these contentions as stemming from overarching narratives which are used to convey a message in a convincing and coherent manner. These narratives stem from ideological and economic considerations, differing value orientations and radically diverging interpretations of history. In other words, these interpretations make selective use of elements from Ukrainian national identity and Ukrainian history.

Even before the information war broke out, various narratives existed about Ukraine's national identity (Korostelina 2013). These narratives were amplified in the actual information war between Ukraine and Russia. This working paper is an attempt to structure and explain the arguments put forward in four overarching narratives. It describes them below as existing competing ideologies mirrored in political and media discourse. Each narrative can be loaded with arguments. Each narrative can be used by both camps, only the arguments used will vary. This is exemplified by references to contentions based on the narrative created by both camps. Further research is needed in order to test the existing narratives and to further explore the new ones.

2. Narratives

2.1. Nationalism

In the nationalist narrative, the conflict is framed as a clash of Ukrainian and Russian nationalism, in which both sides emphasize their national interests. These national interests are constructed and often justified by arguments based on the interpretation of history, in which recurring elements are World War II, victimization, and the Russian world. Ukraine argues that its 'otherness' is not recognized and claims that Russia interferes in Ukrainian matters such as changing its government or preferring an agreement with the EU to an agreement with Russia. On the other hand, Russia argues that the interests of Russian citizens are seriously threatened. It disputes the legality of the changes in the Kiev government, thereby invoking historical arguments, which imply that Ukraine and Russia are by definition intertwined and cannot take different paths (Jahn 2015).

Typical arguments within this narrative, which were voiced, among others, on Russia Today, Russian state television, and in press releases and addresses of Russian government officials, such as the Russian representative in the UN security council, Foreign Secretary Lavrov, and President Putin, are that Crimea is Russian, as Putin stated while addressing the State Duma on 18 March 2014).[3] The message that Russian speakers in Ukraine had been discriminated and Russians in Ukraine had been in danger was disseminated in various Kremlin press statements.[4]

A recurring geopolitical theme are the 'extreme right' or 'fascist' forces inspired by Stepan Bandera and paid by foreign powers who are 'dominating' the new Ukrainian government (Hausmann & Penter 2014: 38). On the other side, Western observers, such as Wilson and the Ukrainian state media, held that Russia has shown in history that it is ambivalent in recognizing Ukraine as a sovereign country.

2.2. Geopolitics

The geopolitical conflict narrative is constructed on a perceived ideological clash between the Russian world with its Slavic or Eurasian 'traditional and authoritarian' values on the one hand and the Western World with its liberal 'decadent and double-sided' Western values (Gray 2014, Wilson 2014, Krzeminski 2015) on the other.

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3   See also the website of the Russian Ministry of Foreign Affairs www.mid.ru for more examples of geopolitical interpretations of the conflict.

4   See en.kremlin.ru.

In this global game, the focus is not on Ukraine but on the West and Russia disputing each other's spheres of influence, invoking memories and images from the Cold War. In this narrative, recurring references are made to alleged attempts to restore the Soviet Union, encirclement of Russia and 'interests' partly justified by earlier humiliations (Wilson 2014: vii, 13). Russia also fights an ideological war with 'homosexual decadency', the liberal West, and 'the dictatorship of the US' (Starink 2015: 238). The aim of Russia is to prevent a unipolar world dominated by the US by creating a multipolar world. Smaller states can be seen as pawns.

Typical arguments within this narrative are that Russia was humiliated by Western powers and deserves its sphere of influence (Creuzberger 2015). In a similar fashion triggered by the Cold War rhetoric on the Russian side, it was thought that Russia tried to restore the Soviet Union. A common argument among Western observers is that Russia is interfering in internal Ukrainian affairs. Ukrainian politicians underline that Ukraine should be able to choose independently from Russia. On the other hand, most Russian media choose a radically different frame, following the interpretation that Ukraine under Yanukovych was not allowed by the West to enter an agreement with Russia because the West wanted to control Ukraine (Portnov 2014: 6).

2.3. Structuralism

In the structuralist narrative, the crisis in Ukraine is attributed to the particular economic and social structure of Ukraine, characterized by lack of domestic political cohesion. Ukraine is portrayed as having an inflexible, oligarchic economy, weak institutions, and high levels of corruption. Korostelina describes independent Ukraine as a façade democracy with a court and a parliament but in which important decisions are made informally (Korostelina 2013: 39).

Ukraine is prone to centrifugal regional forces and lacks unity (see Karácsonyi et al. 2014). Ukraine has a predatory elite presiding over a deeply divided society (Wilson 2014: 39). Ukraine did not unequivocally take the path of other East-Central European and Baltic states and remained internally divided along various lines. In this respect, it resembles the situation in pre-war Poland and the pre-1795 Polish nobles' republic.

In addition to institutional economic factors, another key structural variable is the change of attitude within Ukraine. The shift from a 'homo sovieticus' towards a more 21st-century type of citizen has led to a generational conflict, which undermined stability. The economic growth under President Yushchenko (2004–2009) and President Yanukovych (2009–2014) was unsustainable because of the entanglement of economic and nepotistic power, quarrels between politicians and oligarchs and populist initiatives. Seen from this angle, the actual crisis is a late consequence of the fall of the Soviet Union.

Typical arguments within this narrative are that a corrupt, criminal, and violent regime was replaced by a more European-minded administration after the social unrest caused by corruption and the state of the economy, sparked by the refusal to sign the EU Association Agreement (Wilson 2014, Yekelchyk 2015, Starink 2015). In a similar fashion, Western observers in the Dutch referendum campaign held that Ukraine is in an economic trouble due to corruption: non-democratic business interests, symbolized by the powerful oligarchs, have become too influential in politics (Jacobs 2016). (Other structuralist arguments are that Ukraine is prone to conflict because of internally diverging value orientations (Ryabchuk 2014) and that Ukraine is economically still very much dependent on Russia (Movcan 2015: 162).)

2.4. International Law

The international legal order narrative describes the Ukrainian crisis as a conflict of different interpretations of national constitutional and international law. It explains the conflict with the principle of state sovereignty and the right to self-determination, in which international law plays a pivotal role. It also proposes different interpretations of the legality of the regime change in Kiev. The conflict is centred on agreements such as the association agreement with the EU and the Budapest Memorandum. In this agreement, Ukraine accepted the dismantlement of its nuclear arsenal in exchange for recognition of its borders by the UK, US, and Russia.

Typical arguments within this narrative are that Crimea is an integral part of Ukraine, a view upheld by the EU, the USA, and most other countries in the world. Western observers hold that the return of Crimea to Russia is an attempt to reshape the international legal order, whereas Putin in his address to the State Duma on 18 March 2014 defends the right under international law of self-determination for Crimea (Luchterhandt 2014).

3. Divisions in Ukrainian National Identity

This section will treat the relations between narratives and Ukrainian national identity. All these narratives rest on opposing interpretations of various divisions in Ukrainian national identity. Karácsonyi et al. (2014) distinguish 6 divides in Ukraine: (1) ethnicity, (2) language, (3) geography (different development of steppe and forest regions and cities vs countryside), (4) history (legacies of belonging to different rulers and the interpretation of historic events), (5) politics (authoritarian/Soviet values or Western values), and (6) religion (Kiev, Moscow patriarchate or Greek Catholic). These divisions are powerful predictors of political behaviour.

Molchanov holds that there is not one East–West divide but that there are many linguistic, political economic, and social divides clustered together, each of them mapping onto the rest in sometimes reinforcing and sometimes unpredictable ways (Molchanov 2002: 240/280). Below, I will discuss ethnicity (3.1), language (3.2), regional differences (3.3) (which often coincide with political differences, according to Barrington–Herron 2004), and history (3.4). I will elaborate on the religious angle because the industrial East of Ukraine is not strongly religious. Where religion is more prominent, such as Crimea and Western Ukraine, it often strongly correlates with ethnicity.

3.1. Ethnicity

When discussing the complex ethnic character of Ukraine, reference is frequently made to Ukrainian-born Russian writer Gogol (Jansen 2014: 65, Pirie 1996: 1079). Gogol stated that he himself did not know what kind of soul he had: Russian or Ukrainian. He did not want to choose. Ironically, choosing is exactly what narratives demand from the public in Ukraine and Russia despite abundant evidence that Ukraine and Russia are close in cultural terms (Molchanov 2002: 8, 226). I will first discuss the available data about ethnicity and then look at the interpretation of these data by the Russian and the Ukrainian camp.

Ethnic Composition

The most recent census data from 2001 show a high regional variation in ethnic affiliation. These data are based on self-identification.[5] Ethnic Russians are mostly found in the five most eastern regions and, above all, in Crimea. They are also more numerous in Odessa and Kiev (see *Figure 1*).

The census data show a high though declining number of ethnic Russians in Ukraine between 1989 and 2001. In this period, many Russians went back to the Russian Federation because of the end of the Soviet Union. *Figure 2* shows how the territory where ethnic Ukrainians live changed over time.

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5   See http://www.ukrcensus.gov.ua/eng/. Due to political and methodological questions, a subsequent census was postponed until further notice.
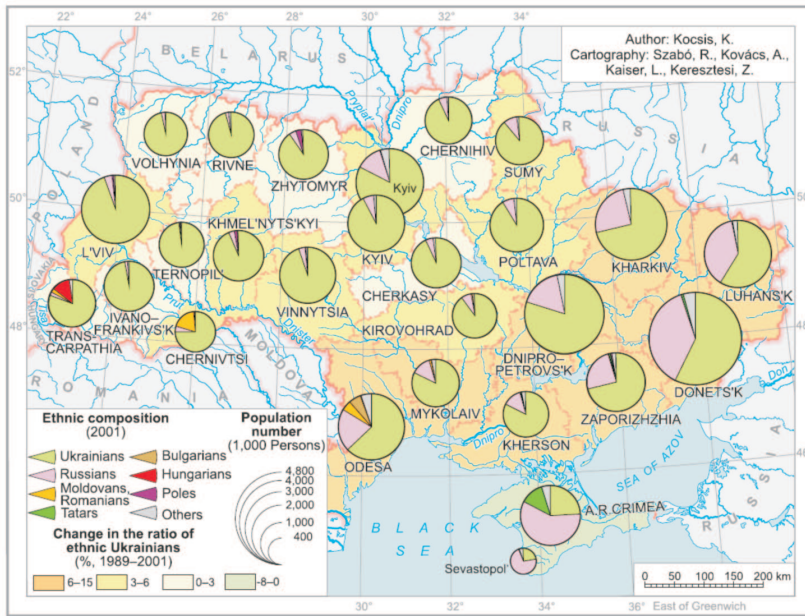
Figure 1. *Ethnic composition of the population of Ukraine in 2001 (Karácsonyi et al. 2014: 115)*
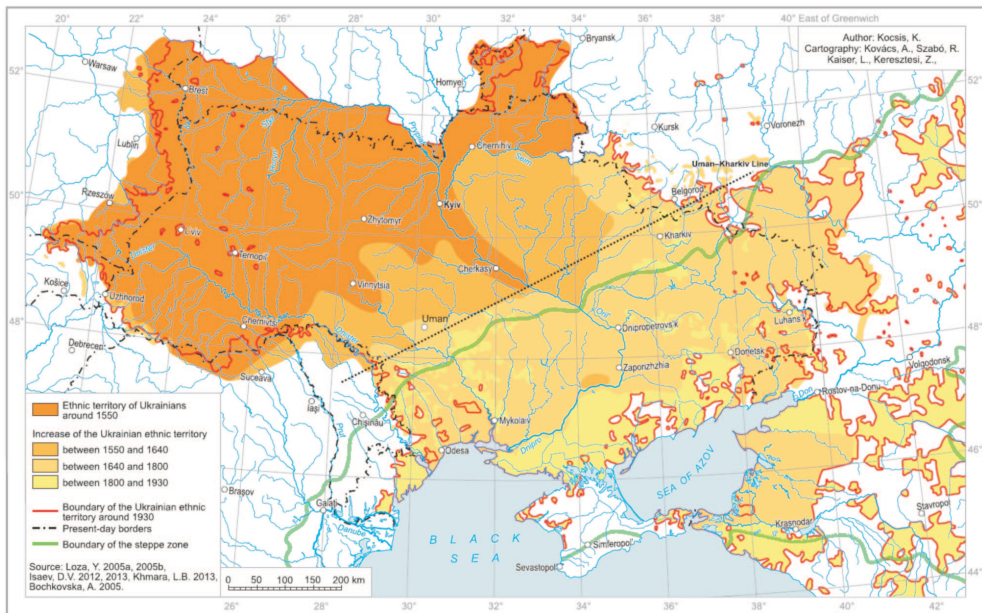

Figure 2. *Change in the Ukrainian ethnic territory – 16th–20th century (Karácsonyi et al. 2014: 105)*

Ethnicity in Ukraine is not as simple as a dichotomy of Ukrainians vs Russians suggests. As census data show, a large minority in Ukraine considers itself Russian and even higher numbers of Ukrainians are Russian speaking or have Russian as their mother tongue. Pirie pointed out that categories which divide Ukraine into Russians and Ukrainians miss the point. Instead, he proposed four categories: (1) strong identification with one ethnic group, (2) strong identification with two groups simultaneously, (3) marginal identification, and (4) pan-ethnic identification (i.e. East Slav or Soviet) (Pirie 1996). His research based on sociological data revealed an important category of people with a mixed identity, which fit uneasily with the Russian nationalist narrative. His research highlighted the existence of self-declared Ukrainians communicating in Russian and (although to a much lesser extent) Russians communicating in Ukrainian. Pirie also found that, not surprisingly, Western Ukrainians show higher intolerance towards Russians than to Ukrainians (Pirie 1996: 1088). Surprisingly, on the whole, people claiming a Russian ethnicity in Ukraine demonstrate a higher level of intolerance towards Russians in Russia than they do towards Ukrainians. This finding suggests that on the whole ethnic Russians in Ukraine are marginal in their national identification.

Besters-Dilger also maintains that ethnic identities are less important than social identities (Besters-Dilger 2001: 522). Ethno-national movements are not primordialist but rather mobilizational and instrumentalist. Identities are changeable, and therefore it is premature to assume that ethnicity determines loyalty to Kiev or Moscow. Korostelina notes that the identification by the government with an ethnic or regional group has been instrumentally used by the Ukrainian government to deflect attention from economic and class issues (Korostelina 2013: 34). These nuanced views do not fit well with views expressed in more nationalist Russian and Ukrainian interpretations of ethnicity.

Russian and Ukrainian Perspectives on Ethnicity

Russian historiography (tsarist, Soviet, and post-Soviet alike) states that 'the Russian people' consist of the Russians, the Ukrainians, and the Byelorussians. Ukraine forms part of a larger Russian nation, which implies a denial of Ukrainian as a separate ethnic category (Kappeler 2011: 192). As noted by Jansen, the Soviet Union has not always been coherent in its policy towards the Ukrainian nation (Jansen 2014: 86). In the 1920s, a Ukrainian identity was promoted, whereas in the 1930s a much more repressive policy towards minorities was pursued. After the independence of Ukraine, Russian elites remained ambivalent to the degree of independence of Ukraine and Belarus (Malek 2011: 399). As a consequence, Ukraine's right to join the EU, the NATO, or even a partnership agreement is disputed with an implicit reference to the unity of the Russian people. Ukraine itself also pursued an ambiguous policy of balancing between the EU and Russia.

When the Soviet Union ceased to exist, ethnic Russians in Ukraine showed considerable ambivalence towards the question whether Ukraine should be an independent country. Jansen argues that a reason to have voted for independence was the poor state of the Soviet economy (Jansen 2014). Pirie also interprets the 'yes' to independence in 1991 as a 'no' to the Soviet political elite in Moscow (Pirie 1996). He associates it with the widespread wish of 'becoming master in our own home' and not as a moment of national awakening of a Ukrainian identity of ethnic Russians living in Ukraine. The implications of independence were unclear to most voters. Pirie also notes that the propensity to support contradictory aims is characteristic for the Ukrainian political culture of the 1990s (Pirie 1996: 1096) and that later surveys conducted in the mid-1990s show a sharp decline in support for independence in Eastern and Southern Ukraine (Pirie 1996: 1099). Yet for all of this apparent indifference to the Ukrainian national idea, it would be equally misguided to assume the existence of a strong Russian identity in the region. The political climate of Eastern and Southern Ukraine relative to Ukrainian statehood may be best described as ambivalent: the population is attracted by both Ukraine and Russia but never fully content in its relations with either (Pirie 1996: 1099).

Although different conceptions exist (Korostelina 2013), from the Ukrainian perspective, the sovereignty of Ukraine is emphasized. Everybody with a Ukrainian passport is Ukrainian, regardless of ethnicity. The 2000s saw the advent of xenophobic and ethno-nationalist parties, such as Svoboda, with a support base in Western Ukraine. These and other signs of Ukrainian nationalism have been skilfully used by Russia to discredit the Ukrainian government and to legitimize its own initiatives in Ukraine (Wilson 2014). There are continuous accusations of payments for provocateurs to discredit Ukrainian nationalist parties. They certainly influence the climate in which radical ethnic narratives can flourish. The present conflict is rooted in ethnic tensions but does not represent a clash of two civilizations. It is rather a clash of interpretations of history and values and a sign of a deepening cultural divide between Russia and Ukraine.

3.2 Language

The Language Situation

In 2001, 67.5% of the population declared Ukrainian their mother tongue. Russian is also widely spoken and understood, and 29.6% of the population declared Russian as their mother tongue, although the number of ethnic Russians is only 17%. Interestingly, also 14.8% of the ethnic Ukrainians declared Russian as their native language. Moreover, about 10–15% of the population speaks Surzhyk, a mixture of Ukrainian and Russian enjoying low prestige and spoken

by people with a marginal national identification. Other, much smaller minority languages are Crimean Tatar, Hungarian, Bulgarian, and Romanian. Russian is most common in Crimea, Kharkiv, Luhansk, and Donetsk and to a lesser extent in Kiev and the regions in the south-east. Ukrainian is the native language of more than 90% of the population of Western Ukraine and is also widely spoken in all other regions except Crimea, Luhansk, and Donetsk, which have 25% or less Ukrainian native speakers. Of those who declared themselves Russians in those regions, 33.3% spoke Ukrainian.
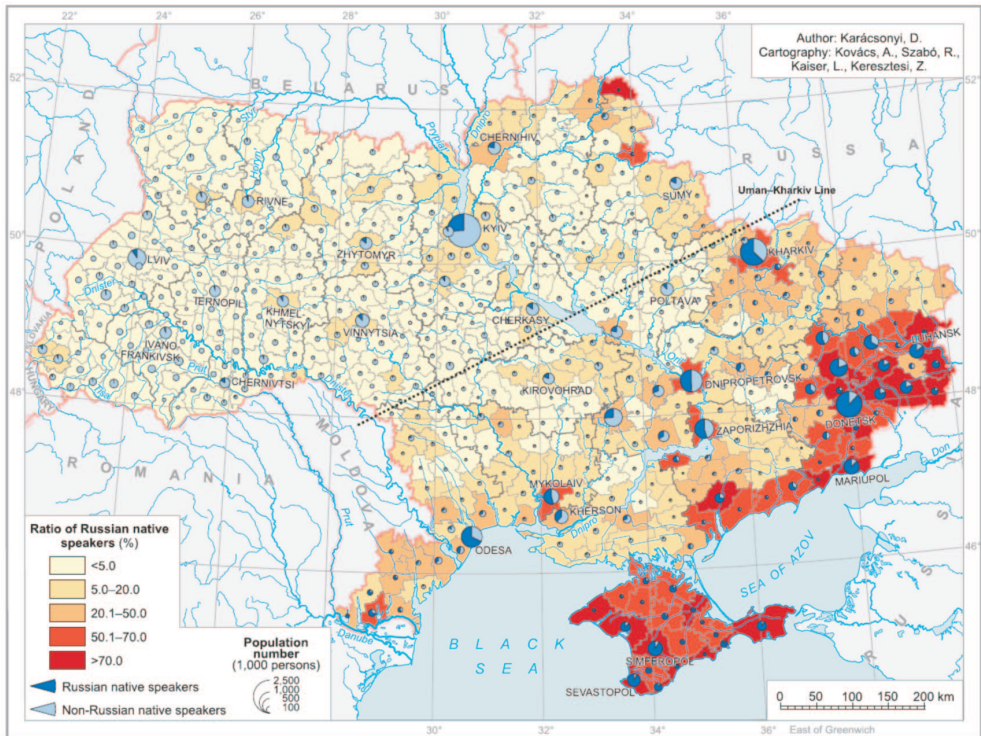
Figure 3. *Russian native speakers in the districts of Ukraine, 2001 (Karácsonyi et al. 2014: 118)*

East of the Uman–Kharkiv line, 50% is Russian speaking, in Crimea, 75% is Russian speaking (Karácsonyi et al. 2014: 115). Research suggests that the number of Russophones could actually be even higher (Karácsonyi et al. 2014: 117); especially in urban areas, Russian is more widely spoken than indicated in census data.

Language Policies in Ukraine

Ukrainian was declared the sole official language in Ukraine in as early as 1989, when Ukraine was still part of the Soviet Republic. This choice is remarkable because before 1991 Ukrainian was rarely used in public life. 51.6% of pupils were taught in Russian, not Ukrainian (Janmaat 2000). Newspapers were in Russian, and Ukrainian enjoyed a low status. Until 1989, Ukrainian was still perceived by many Russian speakers as a peasant dialect (Janmaat 2000). In 1989, Ukrainian was used for family communication, pre-school, schools (especially in Western Ukraine), certain magazines, and newspapers and in the humanities. Russian was dominant in foreign affairs and relations with other Soviet republics, economics, science, higher education (except in the fields of language and history), most of the media, and the army. Only 30% of the newspapers are Ukrainian and only 22% of the TV content on prime time (Wilson 2014: 148).

Besters-Dilger interprets the choice in 1989 for Ukrainian as the only state language as a strategic move to increase the use and status of Ukrainian (Besters-Dilger 2001). Concomitantly, Russian was designated as the language for interethnic communication. Enforcement of the use of Ukrainian was not too effective, and some cities, such as Odessa and Donetsk, declared Russian as the second official language. Crimea adopted Crimean Tatar and Russian besides Ukrainian as their official languages. When Ukraine became independent in 1991, Ukrainian was re-affirmed as the sole official language, with an exception made for Donetsk. This gave Ukrainian another boost.

During the 1990s, a policy of promoting the use and prestige of Ukrainian was pursued, most effectively in education. New language laws were introduced. The constitution was not altered, but it promulgated Ukrainian as the state language of the government unless there was a regional Russian-speaking majority and the government decided that government communication could also take place in Russian. The 1996 Constitution officially confirmed that education in Russian was possible. Measures to promote the use of Ukrainian included quota for Ukrainian language use in the media, use of Ukrainian in education, and the provision of general support for efforts to research and expand (the use of) Ukrainian. This policy was felt as discriminatory by Russian-speaking Ukrainians and Russians in Ukraine, even though Russian could be taught as a minority language and retained official status in Crimea. In the media, Russian still dominated the newspapers in the second half of the 1990s. However, after the turn of the century, the majority of the TV programmes switched to Ukrainian.

The status of Ukrainian as the nation-state language was confirmed by the Language Law of 2012, which formally introduced regional languages for national minorities. According to a survey conducted together with the Kiev International Institute of Sociology, an estimated 59% of the Maidan protesters spoke Ukrainian,

while 24% were bilingual. Contrary to common assumptions about an East–West divide (with the East supporting Russia), 21% of the protestors came from Eastern Ukraine (Karácsonyi et al. 2014: 125). Wilson quotes a poll showing that 4 to 24% of the Russian speakers perceived a threat to Russian language rights when the Maidan protests started (Wilson 2014: 150).

Perspectives on the Use of Ukrainian

Besters-Dilger distinguishes four positions of Russian speakers towards the use of Ukrainian language: (1) discrimination and betrayal of the positive Russian role and the common heritage,[6] (2) Ukrainian is not important because it is culturally less developed than Russian. More radical commentators still hold that Ukrainian is not a language but merely a Russian dialect, (3) propagating Ukrainian is seen as an instrument of Western Ukrainians to take over important positions, and (4) Ukrainian is an instrument of foreign powers aimed at weakening and ultimately destroying the Russian unity (Besters-Dilger 2001).

Ironically, communists were not reluctant to promote Ukrainian language and culture if it suited their aims or fitted in the Zeitgeist. A particularly strong example is the Ukrainization policy of 'korenizatsiya' (literally 'indigenization') pursued by the Soviets until the early 1930s. This policy consisted of promoting the languages of each Soviet minority and giving positions in the party to local communists. Subtelny (2011) and Magocsi (1996) pointed out that even in czarist times, the University of Kharkiv was a hotspot of Ukrainian nationalists. Ironically, their aims were realized by Soviet bureaucracy in the late 1920s, when impressive figures for the use of Ukrainian were reached in what is now Eastern Ukraine, and over 70% of the Ukrainian SSR (roughly Southern and Eastern Ukraine without Crimea) became Ukrainian speaking (Karácsonyi et al. 2014: 110).

This all ended in the 1930s, when new steps were taken in the collectivization of the agricultural sector. The use of Ukrainian deliberately became synonymous with suspicious activities and was associated with kulak farmers. With the advent of Stalinism, the strengthening of the Russian element in Ukraine became more and more important. The status of Ukrainian dwindled and continued to fall until the death of Stalin in 1953. In the Khrushchev era, the Communist Party in Ukraine introduced measures to stimulate Ukrainian. These were later reversed in the Brezhnev era. Only with the Fall of Communism and perestroika did the use of Ukrainian regain priority.

The diminishing use of Ukrainian in the Soviet Union does not imply that Russophone Ukrainians have actually dropped their Ukrainian identity (Janmaat

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6   In the 1990s, protest were voiced against the reduction of the use of Russian, among others, by Solzhenitsyn (who also propagated the reunification of eastern Ukraine with Russia) (Kohut 2011: 239).

2000: 35). They prefer good relations with Russia and at the same time consider themselves different from Russia (Jahn 2015: 43). Conversely, the willingness to speak Ukrainian correlates with support for the Ukrainian state. Obstruction to linguistic Ukrainization is mostly found in the East because in this case a low-status language was introduced in an area where Russian enjoyed high status.

From a Ukrainian point of view, the ability to speak Ukrainian is required, and the use of Ukrainian should be promoted and policies formulated accordingly. Positions towards the use of Russian differ from tolerant – as long as they are loyal Ukrainians – to hostile. In the latter case, every concession to the use of Russian is seen by Ukrainian nationalists as a step in the Russification process. On the other hand, Molchanov cites polls indicating that 70% of the Ukrainians favour some official status for the Russian language (Molchanov 2002: 226). Janmaat (2000) established a correlation between political preference for Kuchma and Russian speakers but notes that it has diminished during his presidency. Political ideology and generational effects seem to be more important divisions than language. For instance, a Russian-speaking city like Kharkiv can easily be (Onwijn 2005) mistaken for a Russian city, whereas the recent events have proved that the fact that most inhabitants have Russian as their first language was not enough reason to side with the separatists. It is therefore the failure to depoliticize the language issue that leads to political instability, not the linguistic distribution in itself.

3.3. Interpretation of History

Both the Ukrainian and the Russian version of the nationalist narrative rely heavily on the interpretation of key historical events since adherents of these narratives believe that the right interpretation of history is a guarantee for the future (Velychenko 2000, Sheiko–Brown 2014). In their view, the basis of local statehood has to be justified by history. Statehood is rootless without blood and soil arguments (Wilson 2014: 11). Today it is believed by the Kremlin that history determines the future, which justifies rewriting history along patriotic lines. Authoritarian patriotism is embraced by the leading political parties. It is also needed to justify the role of post-communist Russia. Unlike in the West, where China or the Arab world is the other, in the state-authorized Russian interpretation of history, the West constitutes the 'other'. Russia, and to a lesser extent Ukraine, have both actively sponsored grand schemes explaining the past and giving directions for the political course of the country.

The Russian perspective on these events is influenced by identity debates in Russia, which followed the identity crisis after the collapse of the Soviet Union in 1991. These debates can be seen as a revival of the debate between Westerners and Slavophiles in the 19th century, with a variation on the arguments

of an enlightened and modern West and spiritual and traditional East. In these discussions, Eurasianism is a recurring feature. Sheiko and Brown define Eurasianism as a broad spectrum of views united by a preference for the spiritual and collective East as opposed to the mechanistic and individualistic Euro-American world of the West (Sheiko–Brown 2014: 60).

The 1990s and especially the beginning of the 21st century saw the advent of radical interpretations. It is not uncommon to state that enemies aim to disempower Russia by depriving it of its true past. An exemplary and influential thinker is Anatoly Fomenko, author of New Chronology, which inspired a movement to revise history (Sheiko–Brown 2014: 14). Fomenko moves between conspiracy theory and rewriting history. His aim is to show how powerful, virtuous, and remarkable Russia has been and how it has been repressed by others. It is therefore important to rewrite history along patriotic lines to avoid events that led to the collapse of Russia in 1917 and 1989. Russia is neither European nor Asian and itself not repressive. Ukraine and Russia have no identity outside of their mutual connection. Ukrainian history is seen as provincial Russian history. Interestingly, a similar view, albeit with a different motivation, was upheld by traditional Polish historiography, which saw Ukrainian history as the history of rebellious peasants.

In Ukraine, national identity is also hotly debated as Ukraine faces the same post-Soviet identity crisis. Ukrainian historiography opposes Russian historiography by arguing that there is continuity between Kievan Rus', the Cossack state of the 17th century, and present-day Ukraine. It claims that the Ukrainian nation has existed throughout history and that it deserves its own independent state and language. The first purpose of Ukrainian historiographers was to have Ukrainian historiography within a meta-Russian nationality and state. At the end of the 19th century, a completely separate history emerged (Kohut 2011: 216). The most frequently used events and episodes, Kievan Rus', the Treaty of Pereyaslav, World War II, and the fall of the Soviet Union will be discussed to show how different interpretations of history look like and how they influence the understanding of Ukrainian politics (Golczewski 2011: 319).

The Historical Development after the Fall of Kievan Rus', Pereyaslav, and the Cossack State

There is considerable historiographical controversy about whether Kievan Rus' gradually moved to Moscow or whether various civilizations sprang from the cradle of Kievan Rus' (Subtelny 2011: 20). In the Russian nationalist narrative, the Karamzin conception of history is hegemonic. Here, there is a transition of centres ending in Moscow and only one Russian people, leading to the thesis of the unity of the 'Rus people' (Kohut 2011: 1/187, Subtelny 2011: 22). Subdivisions between 'Great Russians' and 'Little Russians' are possible but do not imply

recognition of a degree of difference that justifies independent statehood. The prestige and legitimacy of Moscow is further reinforced by the connection with Orthodoxy as the Third Rome and seat of the Metropolitan, later Patriarch of the Russian Orthodox Church. Dynastic, religious, imperial, and historical elements are combined to present one primordialist grand narrative of 1000 years of Russia (Portnov 2011: 30). In this narrative, Ukrainian distinctiveness in speech and customs is explained by Polish influences.

A rival interpretation was proposed in the 19th century by the famous Ukrainian historian, Hrushevskyi, who contended continuity between Kievan Rus' and the principalities of Volynia and Galicia (Polonska-Vasylenko 1968, Velychenko 1992, Magocsi 1996, Snyder 2003). He argues that there are three branches which descend from Kievan Rus': the Russians, the Ukrainians, and the Byelorussians. Besides cultural distinctions, this approach also allows for politically different courses of the present countries: Ukraine, Belarus, and Russia. In this view, Ukrainian entities were driven to alliances with Poland and later Russia.

The implications of both theories are far-reaching. In the so-called Karamzin conception of history, there is no place for an independent Ukraine. The alternative Hrushevskyi thesis leaves ground for radical nationalist interpretations, which would sit awkwardly in a country which not so long ago was one with Russia and which is culturally and economically closely knit to Russia. In either case, one country had to give up the beginning of its history to the other: the heritage of Kievan Rus'.

The Treaty of Pereyaslav (1654) is a significant moment in the history of Ukraine and Russia because it has been interpreted as the union between the Ukrainian and Russian people. In this ambiguous treaty, one of the most revered Ukrainian Cossack leaders, Bogdan Khmelnitsky, pledged adherence to the Russian tsar. From the Russian point of view, this was an irreversible subordination of Ukraine to Russia (Kohut 2011: 15). It is often ignored that just ten years later the Ukrainians concluded a similar treaty with the Poles in order to secure their support. The Ukrainian nobility believed in a contractual relation with the tsar following the model of Polish szlachta and the Polish king. This idea was not shared by the tsar or the Russian administration (Kohut 2011: 87).

The Treaty of Pereyaslav could also be seen as one in a sequence of treaties and agreements which Cossack leaders concluded with varying foreign powers, thereby switching alliances when they deemed it expedient. The Ukrainians turned to the tsar because they were disappointed by the limited progress that the king of Poland had made in granting the same rights to the Ukrainian nobility as he had granted to Polish nobility, a situation mirrored by the relations between Ukraine and the EU. In the latter case, Ukraine turned to the party with the most attractive offer. From the Ukrainian point of view, the Treaty of Pereyaslav was a union recognizing the rights and privileges of Ukraine and not an unconditional union with Russia.

A crucial link in Ukrainian historiography is attributed to the Cossack state of Hetman Bohdan Khmelnytsky in the seventeenth century. Under his leadership, the Cossack state reached its zenith in terms of territory, in terms of privileges from Poland and Russia, and military power. Freedom was believed to be almost boundless, in strong contrast to autocratic tendencies in Russia. Ironically, Cossack mythology is popular among the nationally conscious in Western Ukraine, although it is historically rooted in Left-Bank Ukraine and cannot be purged from Cossack collaboration with the Russian empire (Molchanov 2002: 241).

With the incorporation of the Cossack state into Russia in the 18th century, the term Little Russia emerged. The original political entity was diluted by a gradual strengthening of Russian administrative structures. Political distinctiveness decreased and was over at the end of the 18th century when the Hetmanate was abolished (Kohut 2011: 33). The elite integrated in the Russian nobility and became more oriented towards Russia. Russian identity proved more attractive than the Ukrainian one because it was based on the language and culture of their serfs in Ukraine (Kohut 2011: 56). Interpretations started to diverge again in the first quarter of the 19th century.

Contentious Historical Figures

In the nationalist narratives, both sides make frequent references to contentious figures such as Ivan Mazepa (1639–1709), Joseph Stalin (1878–1953), and Stepan Bandera (1909–1959). It is insightful to consider them because they still cause considerable controversy. In the Russian point of view, Ukrainian nationalists are traitors of the worst kind of the pan-Slavic idea and marionettes of foreign powers (Kappeler 2011: 194). On the other hand, Russian rulers are portrayed as undemocratic and aggressive. The common feature is that all these historical figures wanted to break or reinforce the political ties between Ukraine and Russia. Because they are all part of Russian and Ukrainian history, it is hard to combine for instance a hero status for both the Red Army and the UPA (Ukrainian Insurgent Army) in one historical consciousness.

Where the overall assessment of Stalin is not purely negative in Russia, it is considerably more negative in most parts of Ukraine because of Stalin's role in the Holodomor and his oppression of Ukrainian nationalist movements.

Hetman Ivan Mazepa led an attempt to side with Sweden against Tsar Peter in defence of Ukrainian interests and has been portrayed as a traitor of the Russian cause. On the other hand, he is portrayed in Ukrainian history as a defender of Ukrainian freedom against interference from Moscow.

Probably the most contentious person in modern Ukrainian history is Stepan Bandera, often labelled as fascist or neo-fascist (Onwijn 2005: 51). Although arrested as early as June 1941, he became the symbol of the Organization of

Ukrainian Nationalists (OUN) and the UPA, founded by the OUN. Bandera inspired the more revolutionary branch of the OUN, which later split in two factions: the OUN-B(andera) and OUN-M, named after Melnyk, who was a more moderate Ukrainian nationalist. The UPA was an underground Ukrainian army under the Banderite faction which fought against Germans, Poles, Jews, and Russians. Throughout the war, the OUN remained internally divided about the cooperation with the Nazis in order to establish a Ukrainian state or to fight the Soviet Union, although, at least initially, the Germans were welcomed as liberators in Western Ukraine.

World War II and the OUN/UPA

In order to understand the Russian narrative of 'fascist Ukraine' and the Ukrainian nationalist narrative of 'defending the right cause', I will examine the role of Ukrainian nationalists in WWII. Ukrainian nationalists in the Ukrainian lands under Polish rule had been waiting for their chance to establish an independent state. With the advance of the Nazis in 1941, the OUN believed this chance had come. The OUN welcomed the Nazis and hoped to get support for setting up their own state just like the Slovaks and the Croatians had done. They knew they had little to gain from the Poles (who had always been their masters) or the Russians (who organized mass starvation to wipe out class enemies in the Ukrainian Soviet Republic). On 30 June 1941, independence was declared. The German attitude to the OUN was ambivalent (Golczewski 2011: 330). Military circles were not entirely deaf to the option of working with the Ukrainians, but Hitler declined that option. As a consequence, Ukraine suffered the same fate as many other territories in the newly acquired 'Ostland' because Germany was mainly interested in using Ukrainians as a workforce for its war effort against Russia. There were several attempts to recruit Ukrainians to fight the Soviet Union (*see Table 1*).

Although it is clear that some Ukrainians collaborated with the Germans and had strategic reasons for doing so, it remains open for discussion whether the percentage of Ukrainian collaborators was higher than in other countries or parts of the Soviet Union. The example of the Russian Liberation Army under Vlasov shows that Russians could also be mobilized to oppose the Soviet Union. Nevertheless, in the Russian nationalist narrative, Ukrainians are depicted as collaborators, whereas Russian collaboration did not take place despite abundant evidence to the contrary.

Table 1. *Summary of Ukrainian war efforts for Nazi Germany (Golczewski 2011, Boshyk 1986, Hausmann & Penter 2014: 41)[7]*

Year	Name	Political agreement	Support	Number	Actual involvement
1941	Roland/Nachtigall	Yes	OUN-B	600–800	Advance in Ukraine and Bessarabia in 1941, combat Soviet partisans in Belarus
1943	SS Division Galicia and its successor, the 1st Ukrainian division.	Yes	OUN-M, Ukrainian Central Committee presided by Kubiiyovich, sheptyts'kyi Against: OUN-B, UPA	13,000[7]	Against the advance of the Red Army, combat partisans in Slovakia
1941–1945	Various smaller units of Red Army prisoners and forced labourers	No	N/A	Estimate 10,000	

Whereas Russia argues that it is the biggest victim of World War II, a case could be made for the opposite position: not Russia but Ukraine suffered the most. In support of this claim, it is argued that World War II was fought to a larger extent on Ukrainian territory rather than on Russian territory. Warfare on Ukrainian territory resulted in a considerable number of casualties who fell in the 'bloodlands' (Snyder 2010: 10), who were more often Ukrainians (Jansen 2014: 139) or other non-ethnic Russian nationalities than Russians (Wilson 2014: 72).

Another argument supporting the 'Ukraine as victim' thesis is provided by the abundant evidence of the representation of Ukrainians in the Red Army (Potichnyj 1986, Snyder qtd in Starink 2015: 250). The suffering of the Ukrainian population and the efforts of soldiers from Ukraine are downplayed by Russia, who claims to be a victim of the Nazis and the heir of the heroic struggle against the Nazis, not Ukraine. In this discourse, the collaboration of some Ukrainian nationalists is highlighted, while leaving out their war efforts against the Germans and the Poles, who were also unwilling to create an independent Ukraine (Yurkevich 1986: 73). The fact that UPA longed for independence and would collaborate with any party helping them to realize this is overshadowed by its radical right ideology and violent practices. This brought it ideologically closer to the Nazis than to the communists or the political systems of neighbouring states in central Europe. Potichnyj argues that UPA was composed of all kind of nationalists and that it was oriented towards the Italian model (Potichnyj 1986: 65). The degree of violence used by the UPA did not differ significantly from that used by other forces at that time. In the Russian view, Bandera is a fascist, a label applied to anybody who is an existential threat to Russia (Wilson 2014: 125). As long as

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7   80,000 Ukrainians volunteered, only 8,000 were selected (Rossolinski–Liebe 2015: 255).

Stalinism is presented as progress in Russia, and the suffering it caused neglected, Ukraine ignores what Russia says about Bandera.
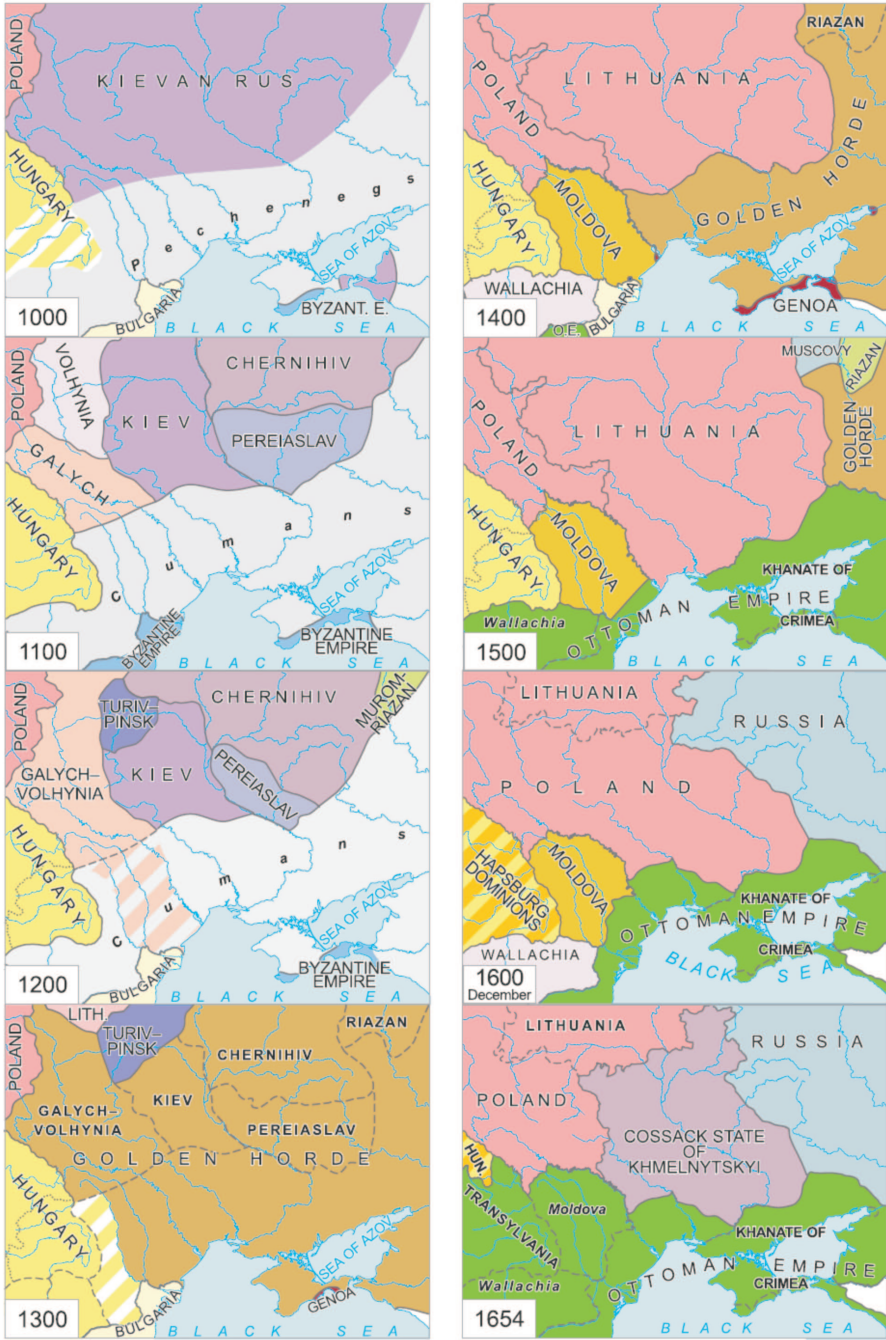
3.4. Regional Identities

The divides in Ukraine's national identity discussed above are mirrored in the regions of Ukraine, which each have very different histories and social economic characteristics. Ukraine exhibits a multilevel regional structure formed in the course of a long historical development reflecting the nation-forming attitudes of Ukrainians. In 1991, for the first time in history, these regions formed an independent state under one administration. This regional variety complicates national consolidation and continues to influence daily life (Molchanov 2002: 239). Regional and historical legacies complicate the process of nation-building and make Ukraine especially vulnerable to external (EU, Russia) and internal (oligarchs) interventions. I will therefore describe the regional differences.
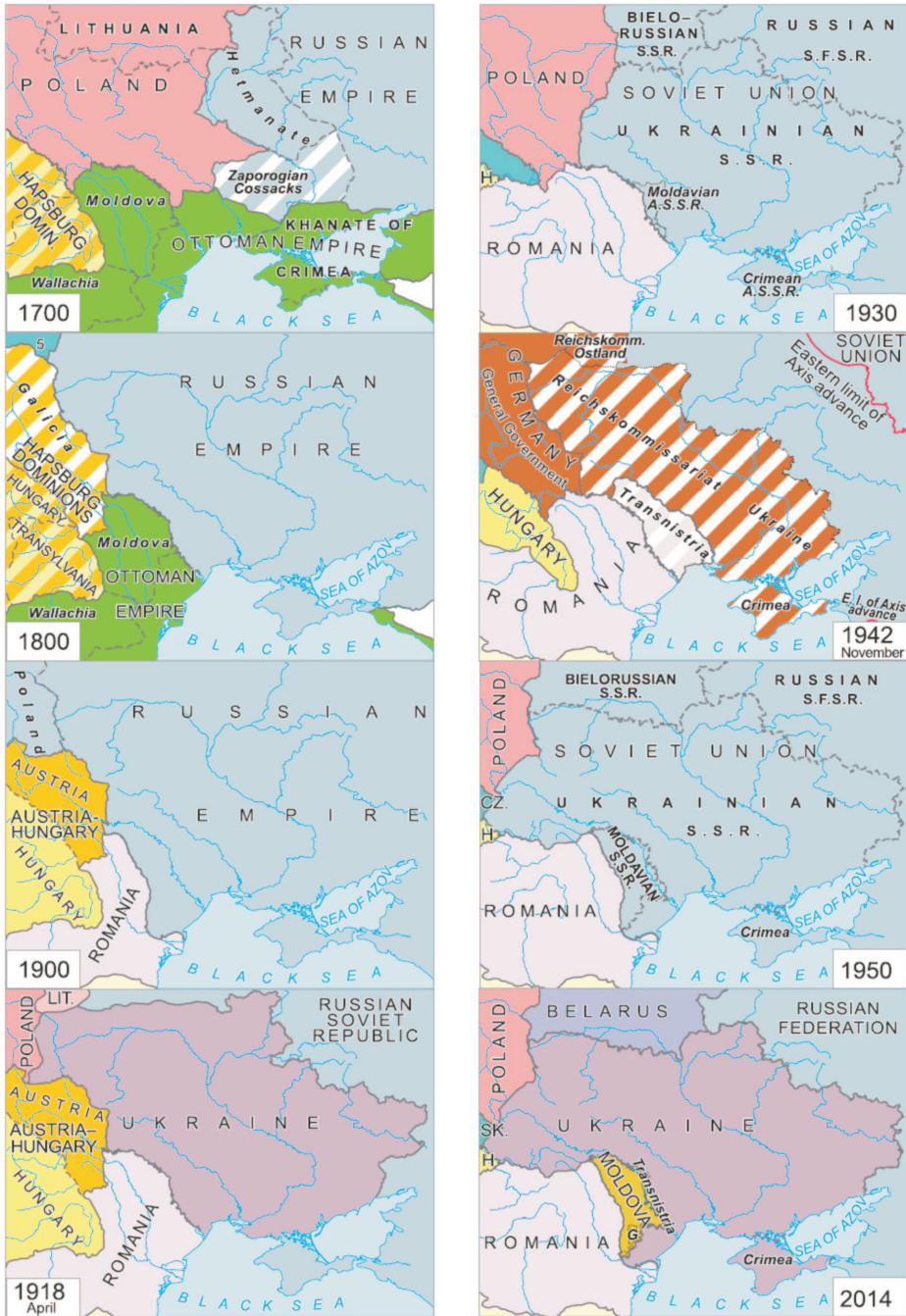
The North, West, and Centre

The west of Ukraine consists of territories that shared two characteristics: they were for long periods in history part of other empires or states and did not belong to the Soviet Union either before 1941. The centre and the north were largely part of the Soviet Union but also historically part of all pre-modern Ukrainian political entities such as Kievan Rus' and the Cossack state. The figures below depict the political entities on the territory of present-day Ukraine. The Cossacks were active in most of the centre, south, and east but not in the west.

Following Barrington and Herron, the northern, central, and western parts can be further divided into the south-western regions, which prior to 1940 belonged to Czechoslovakia (Zakarpattya) and Romania (Northern Bukovina), and the west (Galicia) and west-central regions (Podillya and Volynia, which belonged to the Kingdom of Poland) (Barrington–Herron 2004). Before 1920, most of these territories were part of the Austrian-Hungarian Empire and some of the Russian Empire (after the partitions of Poland). Prior to 1795, most of the territories on the right bank of the Dnepr belonged to Poland. These western parts are the least Russified (Karácsonyi 2014: 111, Jansen 2014: 152). World War II touched all regions, although most battles were fought in the East of Ukraine.

The following figures show the states on the territory of present-day Ukraine.

Maps showing the changing political geography of the region around the Black Sea and Kievan Rus' at successive dates: 1000, 1100, 1200, 1300, 1400, 1500, 1600 (December), and 1654.

Figures 4 and 5. *States on the present territory of Ukraine: 1000–1654 and 1700–2014 (Karácsonyi et al. 2014: 106–107)*

The South and East

Southern and Eastern Ukraine, the so-called 'wild fields' (Polish: Dzikie Pola), were largely uninhabited. These territories could not be efficiently controlled by Slav rulers and were partly cultivated by Cossacks during peace time. For a long time, the territory belonged to the Mongol empire of the Golden Horde and later to the Crimean Khanate (the Tatars), which frequently organized raids into the wild fields. The area was first colonized after the advance of Empress Catherina at the end of the 18th century. As the newly conquered territories had to be colonized, Donetsk was founded in the late 19th century, and the region changed character under the influence of industrialization and the influx of immigrants from all parts of the Russian Empire. The population increased five- to ninefold between 1810 and 1910, and the region was commonly denominated as New Russia (Novorossia), designating the provinces bordering the Black Sea but not Kharkiv. At present, the eastern parts of this area are among the most urbanized areas of Ukraine after Kiev. Already in 1897, all major cities had a Russian majority thanks to industrialization. Still, ethnic Russians mainly live in the industrialized cities of the East. In rural areas, their numbers have decreased. Interestingly, the Uman–Kharkiv line corresponds to what historically was called Novorossia, with the notable exception of Kharkiv. Historically, cities were less Ukrainian than the countryside. Bigger cites tended to be inhabited by Poles and Jews in the West and Russian-speaking migrants in the East. Today, the bigger cities in Ukraine, especially the industrialized cities in the East, show higher numbers of ethnic Russians and Russian speakers. It is among this group of Russian speakers living in cities that support for Yanukovych was the highest (Karácsonyi et al. 2014: 123). The correlation between Russian ethnicity and the votes for Yanukovych is lower because Russians in rural areas were less inclined to vote for Yanukovych. This shows that support for Yanukovych is not purely organized along ethnic lines. His more permissive stance on the language issue also persuaded Transcarpathians – many of whom understand at least some Hungarian or Romanian – to give him their vote in 2010. The Russian-founded city of Odessa shares linguistic characteristics with cities in the East, which are also inhabited by Russian settlers and migrants, such as Donetsk. It is also a very mixed city with various nationalities, including a fair share of ethnic Russians.

The easternmost regions bordering Russia are Luhansk and Donetsk. Historically, these lands were not a part of Kievan Rus' or the Cossack state. They were sparsely populated and since the year 1000 for most of the time in the hands of Tatars. An important difference between Eastern and Western Ukraine is that the eastern regions which belonged to the USSR experienced the Holodomor (1932–1933), while the western regions did not. The Holodomor enabled further Russification of the eastern regions, which were repopulated by settlers from other parts of the Russian empire.

Regarding Luhansk, Donetsk, Kharkiv, and the South-East, pleas for a federal structure were very common after 1991. The term 'Novorossiya' was already voiced in 1991 in the southern oblasts. In 1994, a referendum was held in Luhansk and Donetsk, which led to the introduction of Russian as a language of administration. Of the southern and eastern oblasts, Kharkiv and Dnipropetrovsk are much more linked to central Ukraine. In contrast to these cities, Donbas possesses a stronger local identity.

In Donbass, the national identification is more mixed through intermarriage and migration from Russia. There has been continued support for close ties with Russia and the former Soviet Union despite increasing cash flows from Kiev flowing to Donbass and not the other way round (Wilson 2014: 122). Support for closer ties with Russia has never been sufficiently strong to sustain a full-fledged movement for the reintegration of Ukraine into Russia, as support for such an idea is likely to be as unreliable and ambivalent as support for Ukrainian independence has been (Pirie 1996: 1100).

Crimea

A special situation exists in Crimea, where, according to some observers, already in the 1990s, a majority of the population wanted to belong to Russia (Jordan–Munz Ohliger 1999: 20). Arguably, Crimea has shown the most signs of unease about being part of Ukraine. Crimea was a Russian elite destination and Sevastopol the cornerstone of all Russian claims to Crimea although it became part of the Russian empire only in 1783, after the defeat of the last khan by Catherine the Great. Crimea is not only the basis of the Black Sea fleet and a holy ground in the national psyche because of the Crimean war and WWII (with heroic defeats in 1853 and 1941) but it has also spiritual significance (Putin in his reunification speech, 4 December 2014). Allegedly, Kiev Prince Vladimir the Holy (988–1015) was baptized here, thus introducing Christianity in Kievan Rus'. In Crimea, the Russian population has maintained a strong attachment to the Russian Orthodox Church, which is an important symbol of Russian national identity (Pirie 1996: 1089). Another explanation for the Russian interest in Crimea is that many ethnic Russians in Crimea were born in Russia.

The years 1990–1994 saw a rush for Crimean separatism, and Crimea even declared independence as early as 1992, which was reversed by the skilful diplomacy of President Kuchma and the granting of more autonomy. Sasse cites four reasons why the Crimean question did not lead to a conflict. She points to the multiethnic character of Crimea (Sasse 2007: 8). Then, the Russian movement in the 1990s was ineffective because it could not combine ethno-political mobilization with a socioeconomic delivery (Sasse 2007: 254). Russian nationalism, incapable of addressing needs or resenting a clear identity or

common objective, pragmatic concerns about bread and butter issues, prevailed over identities. Jordan explains the calming down of nationalist ambitions by a conciliatory approach in Kiev and lack of support by Russia in the Yeltsin era. He also points to the Ukrainian–Russian Friendship Treaty of 1997, in which the territorial integrity of Ukraine was guaranteed. Furthermore, internal rivalries and the dire economic situation in Russia prevented a more adventurous Russian approach of Crimea. He concludes that these parts of Ukraine cannot be governed without the support of ethnic Russians living there.

The pragmatic approach of Kiev and the absence of real Russian support were key to conflict prevention in the 1990s. Still, according to Sasse, Crimeans (both Russians and Ukrainians) have been in favour of improved links or integration with Russia. Jordan cites research from Münz and Ohliger, stating that 90% of the Crimeans still wanted a union with Russia after the Treaty (Jordan 1999: 81). As for ethno-political mobilization, the historical animosities between Russian and Crimean Tatars were more pronounced than between Russians and Ukrainians in Crimea. Mobilization was against Ukrainians in Kiev with a nationalist agenda, not against Russophone Ukrainians in Crimea.

In 2014, Russia under Putin succeeded to reverse all of the reasons found by Sasse. Ukrainians could be blamed because of the regime change in Kiev, that delivery of essential services seemed to be better than under the dysfunctional Ukrainian economy, and external support of Russia was well provided. Most decisively, no real effort was made from Kiev to reverse the Russian takeover of Crimea. Pirie's prediction that viable pro-Russian separatism is limited to Crimea became reality (Pirie 1994: 1099–1100). Nevertheless, Sasse's findings raise questions about the sustainability of the Russian arrangement in Crimea once delivery is flawed and the degree of autonomy from the centre (Moscow instead of Kiev) turns out to be diminished.

An East–West Divide?

Various attempts have been made to draw divisions along regional lines. The most commonly used distinction is between Eastern and Western Ukraine. As Karácsonyi et al. showed, an east–west dichotomy is too simple (Karácsonyi et al. 2014, Barrington-Herron 2004). Ukraine's east–west divide does not stem from a conflict between ethnic Russians and ethnic Ukrainians. In order to make more meaningful contentions about Ukraine, Karácsonyi proposed the Uman–Kharkiv line (Karácsonyi et al. 2014). This line can explain why the Ukrainian nationalist narrative is strong in Western Ukraine and the Soviet legacy in the East and why the South ('Novorossia'), East, and Crimea are so prominent in Russian narratives.

4. Diverging Political Values after 1991?

The 1990s were a period of disorder and instability in Russia and Ukraine. Although the fall of the Soviet Union left both countries in a similar position, with similar economic experiences, they developed different attitudes towards the fall of the Soviet Union and different value orientations, with the picture differing strongly within Ukraine. In parts of Southern and Eastern Ukraine and especially in Crimea, Soviet-style values prevailed. Economic and political paternalism at the top level of state bureaucracy, state companies, and private sector managers is very strong. Most workers are politically in a state of infancy and crave for a strong state with strong leaders and state welfare (Korostelina 2013: 35, 38), family values, submission to a strong state, hierarchical and administrative management, and paternalistic expectations of welfare. The dominance of Russian, the influence of Moscow is accepted in a kind of post-colonial relation. Many elements of the Soviet way of arguing, such as 'Russia against the West', which also has its weaknesses, and the WWII glorification fit very well in this value system. Nevertheless, these values and orientations are gradually losing strength on an East–West scale.

After becoming president for the third time in 2012, Putin presented Russia as 'the guardian of older and truer European values, the Holy Trinity of God, authority, and family; essentially, a conservative values project' (Wilson 2014: 3). Russia adopted the communist propaganda version of capitalism and entered an ultra-cynical world of manipulation where everything is permissible and where there is no truth. In this world, political technologists create a fake democracy based on informal networks and backroom politics, using agents, provocateurs, compromising material, and bribery with modern capacities such as social media, blogs, trolls, and web brigades, which have provided scripts that everyone had to follow (Wilson 2014: 21–23). NGOs and political parties can be manipulated at will to disguise the weaknesses of the system such as corruption (Pomerantsev 2015). Institutions are kept weak so that political technology can do its work (Wilson 2014: 25).

On the other hand, in the former Polish, Czechoslovak, and Romanian areas which belonged to the Soviet Union, a post-Soviet (not necessarily pro-western or liberal) orientation exists among the cultural, political, and economic elite of Ukraine. These areas are more oriented towards central Europe and show a desire to take the path of Poland and the Baltic states (Ryabchuk 2011: 427). A similar desire for political and individual development, albeit less nationalistic, is felt in central Ukraine and in most big cities. Corruption is deemed unacceptable and spheres of influence and 'legitimate interference' by Russia in Ukrainian affairs are denounced. Putin is aware that this change in mentality in the most important former Soviet republic is an existential threat to his political system.

The process of change in political values in Ukraine rests on a critical rethinking of the Soviet past, and it is still ambiguous. Many Ukrainian political observers complain that the majority of the population behaves post-colonial, is denationalized and materialistic. This socio-cultural divide has become a major source of conflict. The positive approach of President Yushchenko (2004–2009) to Holodomor and the re-appreciation of the OUN (Organization of Ukrainian Nationalists) did not receive support in Eastern Ukraine and led to ethno-cultural tensions (Korostelina 2013: 41). Kuchma and Yanukovych promoted the Soviet idea of power because it gave them a source of legitimacy, fulfilling the needs of those who were, more or less, still homo sovieticus. This internal orientation did not prevent them from pursuing a multi-vectored, balanced foreign policy when dealing with the West.

5. Conclusions

This working paper presented four overarching narratives comprising the arguments put forward during the Ukrainian crisis. These narratives are: nationalism, geopolitics, structuralism, and international legal order.

These narratives provide the framework for most of the contentions of both sides in the Ukrainian crisis. These narratives are represented in the following diagram. Examples of the contentions stemming from these narratives are inserted on the dimensions global vs local and institutional vs ideological.

Diagram 1. *Map of narratives and interpretations in conceptual space*

This paper further proposed four divisions in Ukrainian national identity, which are extremely helpful while trying to understand contentions stemming from these narratives. The divisions are language, ethnicity, region, and view of history. The narratives are constructed using a selection of elements from one or more of these divisions.

The central argument of this paper has been that a study of the different divisions splitting Ukraine's national identity contributes to a better understanding of the narratives used in the Ukrainian crisis. A closer examination of the divisions in Ukraine's national identity has revealed the origins of a number of arguments that are being used in the information war. Moreover, it also sheds light on the plausibility of some frequently used arguments.

This theoretical framework is summarized in the figure below.
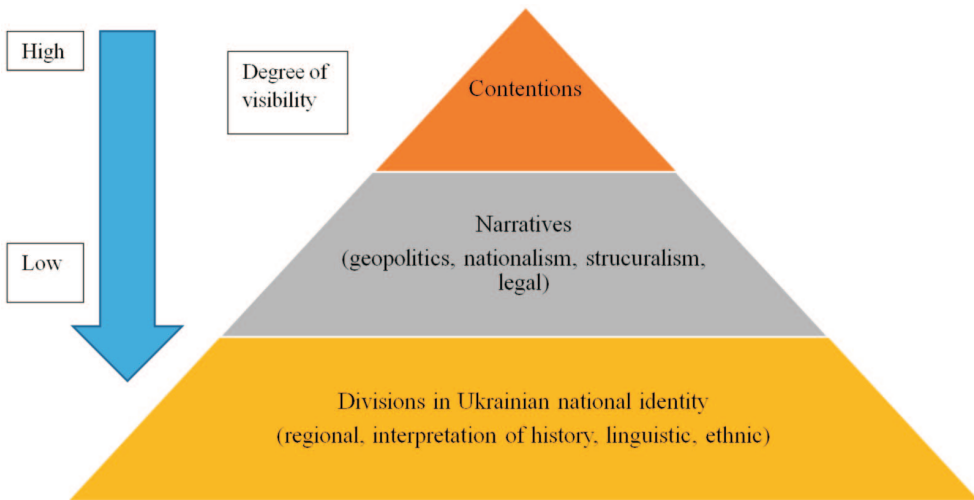
Figure 6. *Theoretical framework explaining the Ukrainian crisis*

Results

In this section, two examples of contentions will be discussed to show how divisions in national identity are related to frequently voiced arguments.

Contention 1: There is an East–West divide.

This contention is most often heard in the geopolitical narrative, implying that Ukraine cannot choose between East and West, or, in more radical narratives, it should be split up because it cannot function because it is internally too divided.

A national identity research by Pirie (1996) and Karácsonyi et al. (2014) showed that the commonly held assumption in Western circles about a geopolitical divide between East and West is questionable. Broadly speaking, Russian-speaking Ukrainians and ethnic Russians living in Ukraine are politically loyal to Ukraine (Jansen 2014: 202). People with a marginally Ukrainian national identification felt betrayed by Kiev but did not support Russia when separatists proved to be poor administrators and showed criminal behaviour (Starink 2015: 294). Ethnic Russians and, to a lesser extent, Russian-speaking Ukrainians do not want a cultural identity forced upon them that is based on ethnic and/or linguistic criteria which are motivated by anti-Russian sentiments, but this does not simply entail that they feel Russian or want to belong to Russia. They are loyal to the Ukrainian state as long as this condition is fulfilled. Mobilization along ethnic or linguistic lines, as was already predicted by Molchanov, did not occur (Molchanov 2002: 206). If a dividing line must be drawn, it would be the Uman–Kharkiv line, which splits the north-west from the south and east. This line corresponds roughly to the forested and mountainous parts of Ukraine vs steppe and Crimea. It divides the predominantly industrial areas historically colonized by Russia, where most ethnic Russians are concentrated from the ethnically more Ukrainian regions, which historically were less attached to Russia. The north-west vs south-east Uman–Kharkiv line is better able to cover the complex situation in Ukraine although it does not coincide with the territories over which Kiev has lost control.

Contention 2: It is understandable that parts of Ukraine which are linguistically, if not ethnically, Russian do not want to drift away from Russia.

This contention is most frequently voiced in the Russian nationalist narrative, but it also occurs in the other narratives. Although the Russian side suggests the contrary, considerable discussion exists about who belongs to the Russian world (Molchanov 2002: 118). As the examples of 'indigenization' in the 1930s and the lack of interest for Crimea in the 1990s showed, Russian political development offers 'a continuity of inconsistency' (Molchanov 2002: 129). Despite efforts in Russia to give answers to those who are longing for national self-consciousness, no clear distinction can be made between who is Russian and who is not. Intermarriage, the legacy of the Soviet Union in terms of Soviet identification and values and the ascent of successor states, such as Ukraine, with ethnically and linguistically mixed populations do not fit well in the simplistic schemes used by nationalists. Socio-historical and cultural differences turned out to be more important than ethnic divisions (Molchanov 2002: 19). The social context (such as the urban–rural divide) is a better predictor for the position in the conflict than ethnic characteristics because high levels of political apathy and mixed marriages make political opinion volatile and blur loyalties. Urban areas with traditional

industry show the highest correlation with support for closer ties with Russia, not 'the East'. A more assertive foreign policy of Russia abroad only adds to the confusion and polarization. Indeed, it could be argued that Russian interference united Ukraine and stimulated the use of the Ukrainian language, for which the same argument can be made. In Russian nationalist narratives, speaking Russian or Ukrainian means you want to belong to the nation of that language. However, census data about language use show that this core assumption of nationalist narratives is false. A much more complex combination of historical, nationalist, geographic, and value-driven convictions can account for the position taken in the conflict by Russian language speakers. This complex diversity is easily overlooked in a war-like situation where a Russian speaker can easily be taken for a Kremlin supporter (Besters-Dilger 2001: 375).

The nationalist point about the discrimination of ethnic Russians in Ukraine (with geopolitical implications of 'justified Russian interference') seemed a plausible explanation when at some point radicals became very prominent at Maidan. This argument was given a geopolitical dimension with the suggestions that these radicals were supported by the West to weaken Russia.

A closer look at the legal and actual situation revealed that eventually no substantial damage was done to the rights of Russians or Russian speakers, as the law proposal restricting the use of Russian was vetoed. In contrast to the Baltic states, Ukrainian citizenship is still offered to all citizens, and Russian is widely spoken. Radical anti-Russian voices received abundant media attention in Russia, but their respective parties failed to attract many votes in Ukraine. From the Russian angle, much of the Russian narrative about the discrimination of Russian could apply to Latvia and Estonia but not to Ukraine. Maidan and the events that followed can be largely explained by widespread dissatisfaction with the political class due to corruption and criminal methods (Starink 2015: 240). It was not an organized coup to eliminate the rights of ethnic Russians in Ukraine.

In a similar way, the study of the divisions in national identity can help provide meaningful perspectives on the other arguments presented in the introduction, which stem from a certain narrative and rely on a selective use of the divisions.

Acknowledgements

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Adaptation Strategies to Turkish Society of Europeans Married to Turkish Citizens

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Abstract. Accelerated and increasingly complex patterns of international migration are correlated with the emergence of various types of transnational families and an ever-rising number of culturally and ethnically mixed couples. Once a typical emigration country, Turkey has recently been established as a transit and receiving society, where numerous Europeans settle due to emotional ties with Turkish citizens. This paper is based on a qualitative study of 10 mixed European-Turkish families based in Istanbul, carried out through in-depth interviews. The paper is divided into three parts. First, it examines the social characteristics of the research participants. Second, it analyses the reactions of family and friends to the mixed relationship. Third, it discusses four adaptation strategies of foreign partners to Turkish society – namely, integration, assimilation, separation, and marginalization.

Keywords: mixed couples, adaptation strategies

1. Turkish Migratory Field: an Overview

During the last two centuries, the territory of modern Turkey has been a space of dynamic population movements, and it has been characterized by both mass influx and mass outflow of people. The high influx of Muslims from the Caucasus, Crimea, and the Balkans into Anatolia started at the end of the 18th century, accelerated in the 19th, and continued throughout the first decades of the 20th century. Russian advancement to Crimea and the Caucasus caused mass migratory movements of Tatars and Circassians to the Ottoman Empire. Akgündüz cites the estimated number of 1,800,000 Tatars and approximately the same number of Circassians who found a shelter in today's Turkey between the mid-19th century and 1922 (Akgündüz 1998: 98). At the same time, the establishment of nation-states in the Balkans as well as the two Balkan wars in 1912 and 1913 caused a large-scale migration of the Balkan Muslims to the mainland of the Ottoman Empire. According to Akgündüz, 'from 1793 to 1913, some 5–7 million

Muslims immigrated into the Ottoman lands' altogether (Akgündüz 1998: 100). In addition, Ülker cites 800,000 immigrants coming from the Balkans between 1923 and 1939 (Ülker 2007).

However, as Tolay reminds us, 'in the Turkish imagination, they were not migrants settling in a "foreign" country; they were not "foreigners" migrating to Turkey. Rather, they were considered as "Turks" "returning" to their "homeland" (even though hardly any of them had ever lived in Turkey and most of them had only a remote knowledge of the Turkish language)' (Tolay 2012: 4). In general, they were quickly and thoroughly assimilated in the course of the nation-state building.

According to Ülker, the rapid assimilation was conducted in two ways. First, the non-Turkish-speaking Muslims were settled in Anatolia among the Turkish-speaking population. Second, the Turkish-speaking immigrants were settled in the Kurdish areas and hence changed the demographic structure there (Ülker 2007). The official state policy was undoubtedly assimilatory. As a result, the immigrants were prevented from cherishing their language and culture and were 'Turkified'. Since the establishment of the Republic, the Turkish nation has been based on what Kaya labels as 'the Sunni–Muslim–Turk trinity' (Kaya 2012: 91), and the incorporation of immigrants followed the same logic.

Conversely, work-related emigration from Turkey was typical in the 1960s and 1970s. Millions of Turks left the country as a result of the recruitment agreements that Turkey had signed with various Western European countries, which lacked a labour force to sustain their post-war economic boom. After the recruitment process was stopped in 1975, the influx of Turks continued through family reunification. In addition, in the aftermath of the Turkish coup d'état in 1980, the guest workers were joined by political refugees.

In the last several decades, the sharp distinction between the sending countries of the poor global South and the receiving countries of the rich North has become blurred. In addition to being an established country of emigration, Turkey started to receive transiting, temporary, and permanent immigrants and has developed into a 'diversified migratory field' (Tolay 2012: 2). Concurrently, the emigration to Turkey became a comparatively recent but a proliferating field of research.

Furthermore, the increasingly complex patterns of international migration and higher mobility are also directly correlated with the emergence of various types of spatially dispersed transnational families. As presently many young people have an opportunity to meet potential life partners away from their hometowns and even home countries, there is also an evident trend of a rising number of cross-national couples. Hence, in this paper, I will focus on a particular group of migrants that I refer to as 'love migrants', women and men from Europe, who had settled down in Istanbul due to their emotional ties with Turkish citizens and established a family. In the Turkish context, my work aims to be a contribution to the field by studying this under-researched phenomenon. The paper deals with

the question that each mixed family needs to answer: 'who are we as a family and where do we stand with regard to our respective societies?' It is divided into three parts and examines a) the social characteristics of the research participants, b) the reactions of family and friends to their relationship, and c) the adaptation strategies of non-Turkish partners to Turkish society.

2. Methodology

My research represents an in-depth micro-level study. Thus, the research methodology is qualitative for the reason that the aforementioned research questions can best be answered through exploring and analysing the decisions, experiences, narratives, ideas, emotions, and perceptions of individuals. Mason argues that the usage of in-depth, semi-structured interviews is appropriate when the goal of the research is the 'understanding of depth and complexity in people's situated or contextual accounts and experiences' (Mason 2002: 65).

I conducted interviews in Istanbul in the spring of 2014 with three women from Serbia, one from Poland, Ireland, Russia, and Turkey, one woman from Germany and her two daughters, a Turkish-Italian family (Turkish wife, Italian husband, and two children), and one man from England. According to the research criteria, all the participants live in Turkish/European marriages, have children, and reside in Istanbul or have resided there until recently. Last year, the Turkish/French couple moved to Jamaica, one of the Serbian-Turkish couples settled down in Ankara, and the Russian/Turkish couple moved to Nizhny Novgorod. I reached the participants through personal contacts and by public calls on Facebook pages such as the 'International Women of Istanbul', 'TOMER (Turkish and Foreign Languages Research and Application Centre)', 'Expats of Turkey', and 'Serbs in Istanbul'.

I conducted and recorded interviews in the participants' homes or cafés, each one lasting between 45 minutes and two hours. The interview protocol was linked to several main topics (getting to know each other, reactions of family and friends, adaptation to life in Istanbul, names and religious affiliation of children, teaching of a minority language, experiences of child rearing in a foreign country), rather than based on pre-defined sets of questions. The structure of the interviews was flexible due to the different experiences and priorities given to different aspects by the informants. Such an approach allowed the informants to focus on issues most relevant to their own family. For instance, some participants skipped questions about the religious life in their family, whereas others provided lengthy accounts. Subsequently, I transcribed the interviews and coded them by 'identifying appropriate blocks of text with a particular code' (Campbell et al. 2013: 297) and putting them into the coding scheme. Afterwards, I linked grouped quotations to the relevant theoretical framework and analysed them from the perspective of interpretivism.

3. Research Participants: Shared Social Characteristics

Research participants are middle- and upper-middle-class people from nine different countries (England, France, Germany, Ireland, Italy, Poland, Russia, Turkey, and Serbia). The main criterion for selection was that the non-Turkish participants moved to Turkey primarily because of a relationship with a Turkish citizen. Hence, I purposefully excluded other types of immigrants (i.e. refugees, undocumented immigrants, work immigrants, circular immigrants from post-Soviet countries, or Turkish returnees from European countries) from the research. Nonetheless, I did not intentionally leave out people from lower or upper classes. Rather, they never replied to my public calls on Facebook pages (Serbs in Istanbul, TOMER, Expats of Turkey, and International Women in Istanbul) nor was I able to contact them through personal contacts.

In addition, the similarity within my sample regarding education, previous experiences of living abroad, and international travel is noteworthy. Among my research participants, only one person (a German wife, Caroline) possesses an apprenticeship degree, whereas all the others hold at least a bachelor's diploma, including one professor at a university and a Ph.D. candidate. The most common profession for female participants (six out of ten) is a professor of language and literature, which is in line with the argument that linguistic competence significantly increases cross-national matching opportunities. Garrido and Olmos identify the mastery of the language as a crucial cultural resource which 'increases opportunities for contact and communication' (Garrido–Olmos 2014: 303). On the other hand, male participants are typically engineers and thus ready to work in different countries.

From the ten interviewed couples, only one had met in the city where both partners settled permanently. Caroline (German) and her husband Mehmed (Turkish) attended the same high school in a small German town at the end of the 1970s. This story is illustrative of a mixed marriage between a wife of a majority ethnic group and an immigrant man in the context of German guest worker migration. Mehmed's parents were low-skilled manual workers from rural Turkey. They came to Germany during the first wave of labour migration from Turkey and never succeeded in mastering the German language. Mehmed, thanks to the effort and encouragement of a primary school teacher, attended a high school, which paved him a road to the university. As the only Turk in the class, he developed close friendships with ethnic Germans, fully mastered the language, and became part of mainstream German society. An unintended consequence of his educational success was the alienation from fellow co-nationals in Germany. In turn, the detachment from Mehmed's ethnic, religious, and linguistic background critically influenced the raising of their children in an exclusively mono-cultural (German) manner.

According to the analysis of Furtado and Theodoropoulos on how the education of immigrants affects their ethnic attachment, 'the relationship between education and ethnic attachment depends on the average skill level of a person's ethnic group as well as his nativity, age at arrival, and race' (Furtado–Theodoropoulos 2008: 2). When Mehmed had grown up and eventually embarked on university studies, the vast majority of Turks in Germany were low-skilled manual workers. The discrepancy between him and the Turkish community with regard to education intersects with his nativity (all German friends) and his arrival to Germany at an early age, which enabled him to be proficient in German, explaining his preference for marrying a German.

In all other instances, husbands and wives are significantly younger than Caroline and Mehmed. Seven other couples are in their 30s, whereas two couples are in their 40s (Didem is Turkish and Alberto Italian; Richard is English and Ayşe Turkish). Hence, the other couples got to know each other not in a context of classical work migration from poor global South to the rich global North but in the circumstances involving international travel, studies abroad, or temporary high-skilled positions in a foreign country. Education, especially language learning, proves to be a critical factor in cross-national mating.

Furtado argues that education affects intermarriage through three mechanisms. These are a) *the cultural adaptability effect*, b) *the enclave effect*, and c) *the assortative matching effect*. First, 'the cultural adaptability effect suggests educated people are better able to adapt to different customs and cultures' (Furtado–Theodoropoulos 2008: 3). Second, 'the enclave effect suggests that educated immigrants are more likely to move out of their ethnic enclaves because, for example, they have larger geographic labor markets" (Furtado–Theodoropoulos 2008: 3). Correspondingly, the educated participants in my research had opportunities to study abroad and thus to meet partners of different ethnic origin. Third, 'the assortative matching effect posits that marriage surplus increases when education levels of husband and wife are similar. This implies that given a costly search process, educated immigrants may be willing to substitute similarities in ethnicity for similarities in education' (Furtado–Theodoropoulos 2008: 3). Moreover, international business is one more favourable context for cross-national matching. Also, given the rise in international travel, it is not surprising that one couple came together in a tourist context.

Furthermore, one important characteristic of the sample is their overall secularism. Only Caroline, the German woman, reported being an observant Protestant, whereas her husband is not religious. Besides that, there is also a religious Turkish-Serbian couple. Both husband and wife are pious; one does not prevent the other from observing their religious obligations. This finding is in line with the research, demonstrating that religious groups act as gatekeepers. The empirical research of Lucassen and Laarman (2009) on intermarriage patterns

in the Netherlands, Belgium, England, France, and Germany in the post-WWII period showed that 'migrants whose faith has no tradition in Western Europe intermarry at a much lower rate than the ones with religious backgrounds that correspond to those common in the country of settlement' (Lucassen–Laarman 2009: 1). The authors point out that people of Hindu and Muslim backgrounds are the least likely to intermarry.

Likewise, Carol studied attitudes toward the intermarriage of the native population in Belgium, Great Britain, Germany, and Switzerland, and immigrants from ex-Yugoslavia, Morocco, Turkey, and Pakistan. The results show that immigrants coming from countries with higher degrees of religiosity (Pakistan and Morocco) are less likely to approve intermarriage than immigrants from ex-Yugoslavia and Turkey. Carol concludes that 'religious identity among migrants and practice among both natives and migrants are associated with reluctance to intermarry' (Carol 2013: 67).

Alike, Dribe and Lundh examined intermarriage for 138 immigrant groups in Sweden between 1990 and 2005. According to their results, the intermarriage rate varies from below 5 percent in some groups (immigrants from the Middle East and Africa) to over 70 percent for the others (Western Europe and North America). The authors argue that cultural factors (values, religion, and language) are crucial for understanding the phenomena. They draw the conclusion that 'the tendency to religious endogamy is the highest for immigrant groups from countries with a high level of religiosity, especially from Muslim countries' (Alike et al. 2011: 320).

To summarize, the shared characteristics of my research participants are higher education, belonging to the middle-class, loose adherence to a religious in-group, previous experiences of living abroad and international travel, and mastery of foreign languages. In all cases, correspondence in education level, socioeconomic status, and lifestyle supersedes ethnic, cultural, and religious differences. This finding corresponds with the assumption of Blau, Beeker, and Fitzpatrick that people, in general, have preferences for in-group marriage; however, 'if various social affiliations intersect, the rates of intermarriage would depend on the degree to which many social affiliations intersect' (Blau et al. 1984: 600).

When discussing homophily – 'the principle that a contact between similar people occurs at a higher rate' –, McPherson, Smith-Lovin, and Cook, following Lazarsfeld and Merton, distinguish between ascribed status homophily and acquired status homophily. 'Status homophily includes the major socio-demographic dimensions that stratify society – ascribed characteristics like race, ethnicity, sex, or age, and acquired characteristics like religion, education, occupation, or behavior patterns' (McPherson et al. 2011: 419). Besides, religion is typically inherited from the family. The couples in this study demonstrate a high degree of acquired status homophily. Furthermore, 'value homophily

includes the wide variety of internal states presumed to shape our orientation toward future behavior' (McPherson et al. 2011: 419). Correspondingly, Garrido and Olmos argue that socioeconomic and cultural preferences are critical for interethnic matching. Cultural resources which 'include values, opinions, lifestyles or views of the world, and the mastery of the language' are particularly important (Garrido–Olmos 2014: 303). Kalmijn emphasizes the role of cultural similarity in establishing and maintaining close long-term relationships:

The similarity of values and opinions lead to the mutual confirmation of each other's behaviour, and worldviews, the similarity of taste is attractive because it enlarges opportunities to participate in joint activities, and the similarity of knowledge creates a common basis for conversation, which enhances mutual understanding (Kalmijn 1998: 399).

Participants frequently emphasize shared values and lifestyles: 'We were always very liberal, free-minded, we did not need to reach an agreement on main values because we believe in universal values'.[1] In addition, all participants present themselves as open-minded, liberal, and cosmopolitan. Caroline claims that 'although my family was conservative, I grew up to be open-minded'.[2] Similarly, Defne argues that 'my family is not religious or nationalist at all, and we know foreigners'.[3] Additionally, Aleksandra problematizes the existence of national groups: 'For me, nations are something completely artificial, I don't believe in borders. Not all people are the same, but that diversity makes this world wonderful. Borders should not be walls but open; let's get to know each other'.[4]

The self-reported personal characteristics of the research participants correspond with the claim of Benet-Martínez and Haritatas that certain cognitive and affective traits facilitate the development of bicultural identity. The authors point out that qualities such as 'tolerance of and interest in new values and lifestyles' (Benet-Martínez–Haritatas 2005: 1022), 'emotional stability (i.e. resilience, flexibility)' (Benet-Martínez–Haritatas 2005: 1022), 'extraversion (i.e. sociability and expressiveness)' (Benet-Martínez–Haritatas 2005: 1023), and 'agreeableness (i.e. empathy and warmth)' (Benet-Martínez–Haritatas 2005: 1023) are crucial for being comfortable in two social and cultural settings. Among my research participants, the influence of personal characteristics is twofold: they influence both the initiation of a relationship with a foreigner and, even more importantly, the attitude toward the partner's country and the adaptation strategies, as will be shown subsequently.

Finally, I argue that my research participants possess mobility capital, defined as 'the knowledge amassed through international mobility that increases one's potential

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1   Didem–Alberto, personal communication, 27 May 2014.
2   Caroline, personal communication, 1 June 2014.
3   Defne, personal communication, 10 June 2014.
4   Aleksandra, personal communication, 6 June 2014.

ability to move abroad and assimilate into national and transnational structures' (Scott–Cartledge 2009: 76). Furthermore, 'it may relate to the modification of the existing forms of capital (social, cultural, linguistic, economic, or human) or it may involve the acquisition of a new type of capital resource altogether (Scott–Cartledge 2009: 76). Section 5 will demonstrate the role of participants' social characteristics and different types of capital impact adaptation strategies to Turkish society.

4. Initial Reactions and the Acceptance of the Relationship

Although the rate of mixed marriages is increasing, and marriages based on love are the norm in Western societies, the majority of people still marry someone from the same social, ethnic, and religious circle. Attitudes towards mixed intimate relationships greatly vary and in extreme cases lead to violence. Smart and Shipman criticize the individualization thesis advocated primarily by Bauman and Beck and a selection of a partner as a 'free' choice of an individual. Rather, they argue that the majority of people still take into account the preferences of their parents and thus marry a person sharing their ethnicity and religion. They claim, on the basis of empirical research, that the selection of a partner based on love does not correlate with 'rejecting an entire tradition and other family and kinship obligations' (Smart–Shipman 2004: 12). Rather, people in mixed marriages, combine 'elements of individualization with a deep commitment to other aspects of traditional cultures' (Smart–Shipman 2004: 14).

People who independently choose out-group partners usually still want the support of their parents. This corresponds with Campbell and Wright's argument, according to which the 'adjustment to intercultural marriage is related to the level of acceptance the couple experiences in their circle of friends, at work, in neighborhoods, and in other social environments outside the family' (Campbell–Wright 2009: 859). In this research, the first obstacle that cross-national couples face is the overall adverse reactions of their parents and friends.

All participants report minor objections on the part of their parents, such as a mild scepticism ('Are you sure?' Kassia, Tanja), referring to a movie 'Not Without My Daughter', depicting an American lady trying to escape from Iran (Kassia, Clare), and subtle discomfort: 'of course they were uncomfortable. My mother was a bit upset. Both mothers. Also, my father was not happy. But they never told us no.'[5] Nonetheless, in a few cases, parental objection was stronger. Caroline's German parents 'did not want a Muslim son-in-law, and they show it openly, until this day'.[6] They set clear and impermeable ethnic (native Germans

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5   Didem, personal communication, 27 May 2014.
6   Caroline, personal communication, 1 June 2014.

vs immigrant Turks), religious (Christian vs Muslim), and class boundaries (the middle classes vs low-skilled workers). They met Mehmed's parents only once and never welcomed him into their home. On the other hand, they eagerly accepted their first-born daughter and raised her themselves to allow Caroline to finish her studies. To summarize, they refused Mehmed in spite of his full assimilation into German society and a rupture with Islam but eventually resorted to a strategy of taking over the responsibility of the children and raising them in a pure German and Christian setting.

Furthermore, only one set of parents had openly tried to stop the relationship. From Richard's long account, it is possible to extrapolate how significant the moral conventions are for opposing an out-group union:

> We had a great difficulty. I was married before, and I have children from my previous marriage. And that's no, no. Anytime I would have time off, I would travel to Turkey to try to get the permission of her parents for our marriage. During many visits, they would not even see me; they would just tell her she should finish with me. Eventually, my wife fell in some kind of depression. She wanted to be with me, I wanted to be with her, but her parents were against it, and in the end, I think her parents said ok. It took them a long time, and they love me now, but to this day I have to keep my life very separate. My in-laws don't acknowledge that my children exist. Even my daughter does not know that she has a brother and a sister. I used to have to deny my own children to people here. It is a lot of mental cruelty to me. It's horrible![7]

Faced with their daughter's firm decisiveness to marry an Englishman, they finally approved it, although with an implicit condition to hide relevant information about his previous life, which violates their moral code and may provoke condemnation from their social circle. While studying parental reactions on intimate out-group relationships within the Turkish immigrant community in the Netherlands, Munniksma et al. developed the concept of 'family reputation vulnerability' (Munniksma et al. 2011: 576). It refers to 'the extent to which parents think that the behavior of their child affects the reputation of the family within their ethnic community' (Munniksma et al. 2011: 576), and in 'cultures that put a high value on conformity and family integrity it is more important for parents that their children do not deviate from in-group norms' (Munniksma et al. 2011: 576). In this case, the family reputation is preserved by not revealing the personal history of the son-in-law.

Walter & Cookie White examine prejudices and stereotypes towards ethnic groups through integrated threat theory, which distinguishes four types of subjectively perceived threats that an out-group represents towards the in-group:

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7   Richard, personal communication, 29 May 2014.

realistic threats, intergroup anxiety, negative stereotypes, and symbolic threats (Walter–Cookie White 2000: 25). First, realistic threats are 'threats to the very existence of the in-group (e.g., through warfare), threats to the political and economic power of the in-group, and threats to the physical or material well-being of the in-group or its members (e.g., their health)' (Walter–Cookie White 2000: 25). Second, intergroup anxiety refers to the anxiety the members of one group may feel when in the presence of members of the other group – for instance, discomfort, shame, and embarrassment (Walter–Cookie White 2000: 27). Third, the negative stereotypes lead members of one group to expect certain negative behaviour from the members of a certain group. In Walter & Cookie White's words: 'to the extent that the expectations are negative, conflictual or unpleasant interactions are likely to be anticipated' (Walter–Cookie White 2000: 28). Fourth, the symbolic threats are 'threats to the worldview' (Walter–Cookie White 2000: 25) and involve 'perceived group differences in morals, values, standards, beliefs, and attitudes' (Walter–Cookie White 2000: 25). Most importantly, symbolic threats are based on the in-group belief 'in the moral rightness of its system of values' (Walter–Cookie White 2000: 25). The most relevant for my research are the negative stereotypes and symbolic threats.

The gender-based stereotypes against Turkish men as womanizers or oppressive towards their wives at the beginning of a relationship are frequently reported. For families with Christian backgrounds, the perceived treatment of women in Turkey presents a major threat, and it is a consequence of negative stereotypes toward Turkish men. The fear based on negative stereotypes is exemplified in Clare's account: 'My sister was very frightened; maybe I would be also if she married a Turk. There are many misconceptions of what Muslim culture is like. It is a lack of knowledge, it boils down to ignorance, and, in a way, you cannot blame them.'[8]

Moreover, as Sanja claims, the majority of friends' reactions can be summarized as 'Please, don't tell me you were dating a Turk? Long-distance? So, you really think he is not cheating on you?'[9] Likewise, Defne (Turkish) reports her first encounters with a husband's family and friends:

> He is coming from the south of France, from a small village. They have never seen a Turkish person before. They were telling me, 'but you cannot dress like that in Turkey, can you?' when I was wearing short sleeves. Also, whenever we went to visit someone new, they would ask Jerome if I drink alcohol and eat pork. When they came to Istanbul for the wedding, they realized that Turkey is not a country like Iran at all. They were surprised to see it, and they completely changed their ideas about Turkey.[10]

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8   Clare, personal communication, 2 June 2014.
9   Sanja, personal communication, 8 February 2014.
10 Defne, personal communication, 10 June 2014.

However, the prejudices against Turkish men diminish once a close contact is established. It corresponds to Kalmijn's argument that intermarriages influence transformations of negative attitudes towards other groups. According to Kalmijn:

> Interaction gives people an opportunity to realize the individual variety among the members of another group and in doing so, it may ultimately weaken their prejudices and stereotypes. Because intermarriage often connects the social networks of the two spouses, this applies to a range of out-group members and not just to the immediate partners (Kalmijn 1998: 396).

Furthermore, it is intimately important for Europeans that their Turkish family is not 'traditional'. 'Traditional' Turkey is widely imagined as conservative, backward, or, to be more precise, as an antithesis to Europe and its culture. When asked about the Turkish in-laws, the majority of participants began their story by stating how modern and secular they are. Modernity and secularism are outlined as factors which enable communication and ensure a harmonious relationship. The most common strategy is to distance a husband's family from Islam. ('His family is modern. They are secular. There is no Ramadan. They don't pray. And they are from Istanbul; I don't think I would go somewhere in the East.')[11]

Likewise, Sanja (Serbian) simultaneously emphasizes a husband's non-complying attitude and autonomy by challenging the norms and authorities, on the one hand, and, on the other hand, how progressive his parents are: 'For me, the greatest difference between Serbs and Turks is that here non-married couples cannot stay in the same house during the night. But we stayed together when we were not married, and we even went to his parents in Adana'.[12] On the contrary, no one attempted to inscribe positive characteristics to the European counterparts, as if their 'modernity' is taken for granted. The participants' narratives echo internalized Eurocentrism, in which Turkey is yet to reach full 'modernity'. However, by insisting on the 'modernity' of the Turkish family, men and women from Europe negotiate and transform symbolic boundaries between *them* (as the Turks, Muslims, Eastern) and *us* (Western, secular, modern).

Moreover, not only foreign but also Turkish participants underline the modern outlook of their families: 'You know, I come from a family that is not nationalistic or religious at all. And we know foreigners.'[13] What is more, Didem links religion to the rural origins of her mother by saying 'My parents were not religious. Actually, they never practised it. My father was even quite against religion, I would say. Only sometimes my mother is religious because she is coming from the Anatolian side.'[14]

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11 Kassia, personal communication, 4 June 2014.
12 Sanja, personal communication, 8 February 2014.
13 Defne, personal communication, 10 June 2014.
14 Didem, personal communication, 27 May 2014.

Didem's perception reflects the Turkish urban secularist discourse. In this discourse constructed by the Republican elites, as explained by Demiralp, pious Muslims are depicted as provincial, lower-class, even different in physical appearance, with their skin colour being darker than that of their urban counterparts. The internal distinction between Islamists and secularists as well as 'black' Turks and 'white' Turks reproduces the Orientalist Western view of Turkey. As Demiralp argues, for the Republican elites of the Turkish Republic, 'Islam became a heuristic or a mental short-cut to describe the "primitive" rural other, and secularism defined the way to Western modernity and civilization' (Demiralp 2012: 514).

Furthermore, the perceived lack of morality of the Western world is threatening for Muslim families. In general, the grandparents are the most afraid that their cultural traits, including religious beliefs, will not be transmitted to their grandchildren. However, if they get a warranty that grandchildren will learn their language and be versed in their customs, the objection to cross-cultural marriage ceases to exist.

Additionally, my research confirms a gender-differentiated attitude towards mixed marriage. According to Islamic religious law, a Muslim man is permitted to marry a non-Muslim woman (Christian and Jewish), whereas the opposite is not allowed. Cila and Lalonde argue that although women are primary caregivers and 'the carriers of cultural and religious continuity for future generations' (Cila–Lalonde 2014: 359), there is a concern that if a woman is married to a non-Muslim, she would not be allowed to raise her children in Islam. On the other hand, a Muslim man would not face it, 'given the Islamic tradition of the father having the final say in how children are raised' (Peek 2006, as qtd in Cila–Lalonde 2014: 359). Therefore, the intergenerational transmission of religion is ensured when a Muslim man marries a non-Muslim woman, at least at the theoretical level.

The only highly religious Muslim family in the sample did not object to a Serbian Orthodox Christian daughter-in-law. Aleksandra (Serbian) reported a wonderful reaction from Umut's parents, although she anticipated their disagreement, as she is not Turkish and Muslim. What was important for Umut's family was to ensure the intergenerational transmission of Islam. As it was secured by Aleksandra's agreement to raise the children in 'a Muslim spirit', a potential basis for objecting to their marriage ceased to exist.

Similarly, Caroline reported how supportive her in-laws, low-skilled Turkish immigrants in Germany were: 'Certainly they expected to have Turkish *gelin*.[15] But they accepted me immediately. They only had this one son, and they realized that our relationship was good for him. I pushed him at school; I pushed him in the university. They saw it would do him good'.[16] In Caroline's case,

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15   Bride.
16   Caroline, personal communication, 1 June 2014.

Mehmed's parents recognized the advantages of marriage with a native German. It corresponds with Remennick's understanding that marriage to a native is 'a guide to a new society, facilitating both cultural adjustment and practical matters' (Remennick 2009: 725).

On the other hand, seemingly secular families, such as the family of Richard's wife, fiercely objected a Christian son-in-law, which actually corresponds to the Islamic tradition. Their relationship with Richard greatly improved upon his acceptance to register a daughter in the Turkish population office as a Muslim, albeit he finds it strange: 'She is registered as Islam. She is unusual because they should take the father's religion, but it is easier for me because of the family. Although I am a Christian.'[17] The Turkish family managed in assuring, at least, the formal transmission of religion.

As reported by the research participants, the main reasons for objections to cross-national marriage in this research can be summarized as moral concerns, in the sense of different moral codes (such as in Richard's case, whose previous marriage and children presented a moral obstacle) and the fear of the loss of religion, language, and national identity in subsequent generations. Upon ensuring that children will be familiar with the heritage, in-laws tend to accept the marriage. Transmitting religion is a condition of particular importance for religious people. Mastering a language is an important factor enabling communication with the in-laws and hence leading to acceptance, accompanied with prolonged periods of life together in the same household and, particularly when children are born, respecting each other's heritage.

In this research, each cross-national family is formed despite various degrees of initial refusal by the parents and the suspicion of friends. This is indicative of the individualization process in the societies in question. Didem and Alberto explicitly dismiss their parents' opinion by saying 'what our parents thought never had too much importance for us. But even if they objected, it would be not a problem because we have a very strong bonding with each other. No outsider effect would influence us.'[18]

With the passing of time, generally closer relationships between parents and sons- and daughters-in-law develop, attitudes change, and tensions subside. All participants, except the German-Turkish couple, report a significant improvement of mutual relationships despite a tense beginning. Even Richard (English), whose in-laws refused a meeting at first, reported a warm and emotional relation with them, albeit complex and loaded with disagreements.

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17   Richard, personal communication, 29 May 2014.
18   Didem and Alberto, personal communication, 27 May 2014.

5. Adaptation Strategies to Turkish Society

Although the assimilation theory in migration studies has been challenged, in recent research intermarriage is still taken as the final assimilation phase. Meng and Gregory (2005) suggest intermarriage is crucial for economic assimilation. As a result of the native partner's assistance in learning the language and the customs of the society, since they provide information about these, and due to their contacts, intermarried immigrants are better off economically than their non-married counterparts. Bisin and Verdier (2000) argue that an individual parent's ability to transmit cultural traits to their children depends on partner choice. In a case where a minority member marries heterogeneously, chances for successful transmissions are limited, and most likely a child will internalize a majority set of cultural traits. For Quian and Lichter, 'intermarriage provides a clear signal that minority group members have adopted cultural patterns of the host or majority population, such as its language and customs, and that they have been absorbed, both economically and politically into mainstream society" (Quian–Lichter 2007: 70).

Scott and Cartledge discuss assimilation in relation to individuals who migrate abroad for emotional reasons. In their view, immigrants belonging to transnational families possess resources enabling the uncomplicated assimilation into the 'host' society. It is their claim that 'few first-generation migrants can be said to have "gone native". Moreover, those that have tend to share one thing in common: they live with a partner born and brought up in the host country' (Scott–Cartledge 2009: 61). In addition, in their argument, women are more likely to be assimilated into their partner's society due to their superior language skills and for the reason that 'national identity/patriotism tends to be a less intense locational tie for women than it is for men' (Scott–Cartledge 2009: 66).

However, Song corrected a widely-held assumption on intermarriage as a final stage in the assimilation process:

> So, while intermarriage may be said to herald a form of structural assimilation in terms of one's status and formal inclusion in certain families and social networks and institutions, we cannot assume that minority individuals (or couples) who have intermarried necessarily feel welcomed, or that they 'belong' in many mainstream settings (Song 2009: 341).

Song further argues that a person marrying into a native family will not necessarily receive a warm welcome and social acceptance. In accordance with Song's argument, this research finds a) correlation between the quality of a relationship with Turkish in-laws and adaptation to the Turkish society and b) correlation between the strength of ties with a family of origin and success in

transmitting cultural heritage. Hence, my research discusses adaptation strategies while taking particularly into consideration the relationship with in-laws.

Berry (1980, 1997, 2005, 2010) developed a theoretical model on four acculturation strategies based on two dimensions: 'the degree to which people wish to maintain their heritage cultures and identities' and 'the degree to which people wish to have contact with those who are outside their group and participate with them in the daily life of the larger society' (Berry 2010: 476). They are labelled as assimilation, integration, separation, and marginalization. Individuals who do not aim to preserve their cultural heritage tend to assimilate fully into the new society. Integration combines the maintenance of culture with participation in larger social networks. 'The marginalization strategy is defined by little possibility or lack of interest in cultural maintenance (often for reasons of enforced cultural loss) and little interest in having relations with others (often for reasons of exclusion or discrimination' (Berry 2010: 476). Furthermore, 'the separation strategy is defined by individuals who place a high value on holding on to their original culture and avoid interaction with members of the new society' (Berry 2010: 476).

When analysing the adaptation strategies of my research participants to Turkish society, I combine Berry's theoretical framework with Tartakovsky's (2011) Acculturation Intensions Model, the study of Burgelt, Morgan, and Pernice (2008) on the effect of pre-migration experiences on adaptation strategies, and Safdar, Lay, and Struther's (2003) study on factors impacting personal well-being in the process of settlement in a foreign country. To conclude, I analyse four basic adaptation strategies (assimilation, integration, marginalization, and separation) through the combination of factors outlined by Berry (2010), Tartakovsky (2011), Burgelt et al. (2008), and Safdar et al. (2003).

Tartakovsky's Acculturation Intensions Model focuses on the factors underlining the preferences for different acculturation strategies. The author defines immigrants' acculturation intentions as 'the immigrants' plans to engage in the specific cultural practices that ensure a desired level of their interaction with people from the host country and from their country of origin, as well as the immigrants' adherence to the corresponding cultural norms and values' (Tartakovsky 2011: 85).

According to this model, the main factor is 'the attitudes towards the country of origin and the receiving country, as it primarily affects the immigrants' intentions to interact with and to accept the norms and values of each society' (Tartakovsky 2011: 86). Secondly, the model takes into account the effect of social norms expressed in the immigration laws, welfare programmes for immigrants, and the policies (Tartakovsky 2011: 87). Third, perceived control over the acculturation process combines 'personal resources needed for acculturation (e.g. the ability to learn languages, openness to new experiences, flexibility, financial

resources, and job skills) and perceived environmental constraints (e.g. perceived discrimination and social support)' (Tartakovsky 2011: 87). Fourth, the effect of psychological resources on the immigrants refers to specific personality traits. On the one hand, those who are flexible and open to new experiences generally opt for assimilation and integration into the host society. On the other hand, in Tartakovsky's words, 'those who lack the required resources are probably forced to choose acculturation strategies that enable them to interact mostly within their society of origin and avoid interacting with host society (separation and marginalization)' (Tartakovsky 2011: 87). Finally, the effect of environmental constraints refers to the personal experiences of the immigrants. This model 'assumes that the immigrants tend to interact with the members and adhere to the norms and values of society, which they feel is accommodating towards them, while they tend to distance themselves from a society which they perceive as a rejecting [one]' (Tartakovsky 2011: 87).

Furthermore, the study of Burgelt, Morgan, and Pernice (2008) on how pre-migration experiences impact acculturation strategy is relevant to this research. They identified readiness to migrate, upbringing in an open family with contacts with foreigners, and the degree of the previous travelling (contributing to the ability to manage challenges in a foreign country) as decisive factors for adequate adaptation to the new society. Hence, the research assesses a willingness to move to Turkey and a type of the previous travelling with regard to the chosen adaptation strategy.

Finally, Safdar, Lay, and Struthers (2003) identify several factors important for personal well-being in the course of the acculturation process corresponding to the context of integrated individuals. They particularly emphasize perceived bicultural competence, as 'individuals with high perceived competence have a certain level of knowledge of the host society, are more familiar with its cultural values and beliefs, and have better communication ability' (Safdar et al. 2003: 560–561). Additionally, they point out the significance of connectedness to the family. In this research, both connectedness to a family of origin and to the partner's family bear significance. Hence, family allocentrism, as opposed to idiocentrism (focus on the 'unique aspects of self and the division of self from the others' (Safdar et al. 2003: 561)), refers to a sense of strong connectedness to others.

This research finds only one instance of assimilation, Caroline's husband, Mehmed. Although they currently reside in Istanbul, Mehmed was educated and established his career in Germany; they met there, and their children were born and spent the majority of their lives there. As the only ethnic Turk in his high school, at the university, and, through his marriage, with Caroline, his access to formal and informal networks of Germans was smooth. 'He loved playing soccer and he had his soccer friends all being Germans. And being the only Turkish child at school, he was just forced to talk in German. So when we met he would talk

German even to his siblings.'[19] Despite the presence of his family and numerous co-ethnics, as a result of his upward mobility, he limited his contacts with Germans. His wife, Caroline, explained why as a couple they mostly socialized with Germans from the perspective of class and cultural differences:

> We did have Turkish friends at the university, but they were all single, so they would not be relaxed to come to our house. Also, we knew some other Turkish-German couples, but we do not have much contact with them because they are mostly workers. They married some worker German girl to stay there. There was no point in having a relationship with them; there were no topics to talk about; things that we are interested in and things they are interested in are just different.[20]

Mehmed's personal traits (i.e. ability to quickly master the German language, acquire the skills necessary for highly qualified jobs, and easily form friendships with ethnic Germans) coupled with social support (teachers, girlfriend), a tendency to avoid discrimination (a result of a low status of the Turkish community), lack of interest in preserving the Turkish language and culture, and plans for long-term stay in Germany are the factors which contributed to his successful assimilation. The case of Caroline and Mehmed represents an exception among my research participants, and it occurred in the context of Germany. None of the participants reported pressure to assimilate into Turkish society.

The most common adaptation strategy in Turkey is integration. Sanja (Serbia) represents an ideal case of a perfectly integrated person into the Turkish society while simultaneously keeping exceptionally strong ties with Serbia. She holds a BA in Turkish language and literature and works as a translator in Serbian language and as an administrative staff of a famous Turkish hospital, which admits patients from former Yugoslavia for treatment on a daily basis. Her social life in Istanbul is divided between her and her husband's mutual Turkish friends and relatives, several friends from Serbia, and an international group of people (from Romania, Macedonia, Russia, etc.) that she works with at the same hospital. She speaks Serbian, Turkish, and English on a daily basis and communicates with people from numerous countries. She fully participates in the formal and informal networks of the host society and at the same time effectively keeps strong connections with Serbia due to her job and informal networks. Having set the initial boundaries towards the in-laws regarding the upbringing of her child, she cherishes a harmonious relationship with them. She keeps her own 'ethnic private niche' for herself in the diaspora, without involving her husband and son.

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19   Caroline, personal communication, 1 June 2014.
20   Caroline, personal communication, 1 June 2014.

By choosing to specialize in Turkish language and literature prior to meeting her husband, she already showed an interest in Turkey and became proficient in Turkish culture, history, and society. Considering the pre-migration factors of adjustment, she had a cultural and linguistic capital, and a positive attitude towards the partner's country. She is fully culturally and socially competent in both Serbian and Turkish settings, and practises what Steven Vertovec calls 'bifocality' or 'dual orientation' in everyday life (Vertovec 2004: 977).

Besides Sanja (Serbian), the integration strategy is employed by three other women: Aleksandra (Serbian), Kassia (Polish), and Clare (Irish). Common to all of them is their exceptional eagerness to learn the Turkish language and spend prolonged periods of time in the same household with their Turkish in-laws. These proved critical for language acquisition but also for the diminishing of 'acculturation stress' and for the satisfaction with life in Turkey. When a major life event, such as the transition to marriage and parenthood, occurs in an unfamiliar context, a social support is critical for overcoming stress. In fact, the women who had lived with a Turkish mother-in-law once and established a harmonious relationship with her, outlined this experience as an enormous asset enabling successful adaptation.

Professional satisfaction (economic integration) also proves to be an important factor in overall adaptation. Aleksandra and Umut pursue their joint dream of establishing an organic farm, whereas Kassia and Clare work as English teachers. Besides, their social networks are diverse. In addition to cherishing friendly relations with their husbands' families and friends, they have friends within an international community and with fellow nationals.

Only one couple in the sample, Didem (Turkish) and Alberto (Italian), reported a separation from both societies. The essential reason for it was a lack of support by both sets of parents, although they claim they opted voluntarily for what they call multicultural life. The marginalization strategy of Berry was criticized by different authors. For instance, Oudenhoven et al. (2006) argued that immigrant groups do not opt voluntarily to be marginalized, but they are rather forced to accept it. However, the difference between voluntary and forced marginalization is a difference between affluent and low-skilled immigrants (refugees, asylum seekers). Both husband and wife complain about the treatment they receive from their parents: 'her mother, even after 20 years of marriage, when she has a chance, she is staring at me as if I came from some other planet'.[21] Moreover, in Alberto's words:

> Actually, I never had a good relationship with my mother; we always had problems. She is not the type of grandmother who would take care or spend time with grandchildren, either. I always felt I never got any help from her side. And Alberto's mother, she was a typical mother-in-law, jealous, always

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21   Didem, personal communication, 27 May 2014.

interfering, always criticizing, you are not cooking well. But, fortunately, he never took her side.[22]

As a result, Didem and Alberto have created their own private niche and detached themselves from multiple actors in the society. They travel frequently and easily resettle as a family. They are equally distant from their respective Turkish and Italian societies and perceive themselves as a 'multicultural' family with a supra-national identity. Accordingly, their social circle is limited exclusively to the international community. In spite of full proficiency in Turkish and Italian, they still prefer to stay in limited international circles in Turkey and other countries. As Didem recounts their experiences from Pakistan: 'We went out to a very small club only for foreigners, Pakistanis were not allowed to go. Also, we were friends with their high society. Very nice people, always throwing a lot of parties.'[23] Similarly, Alberto observes: 'Foreigners live like on an island in Ankara, so you meet them all the time. We were in Turkey, but still in a multinational environment.'[24] Finally, they openly reject to be associated with their heritages: 'Our friendships are very limited, we cannot be friends with only Turkish or only Italian couples, just with mixed couples' and create a private 'third space'.[25]

Furthermore, if not faced with a welcoming attitude, foreign parents tend to develop an antagonistic position towards the host society and hence opt for a marginalization strategy. It is usually coupled with personal disinterest toward the culture, which is particularly typical for men from countries whose respective cultures are assumed to have a higher value, such as England and France. Hence, they tend to develop a feeling of cultural superiority. Richard moved unwillingly to Turkey due to his wife's illness and was initially confronted with the unwelcoming attitude of the in-laws. Hence, in his view, living in Turkey represents a sacrifice: 'I gave up so much, for example, a great and important job.'[26] He did not have a previous experience about life abroad nor does he speak a foreign language. It is in line with the empirical finding of Burgelt et al. that 'those participants who traveled less had more limited experiences, knowledge and understanding of themselves and life, and a smaller response repertoire' (Burgelt et al. 2008: 291).

On the other hand, his wife speaks perfect English and has adapted exceptionally well to the English society. He is particularly resentful toward his in-laws and Turkish culture. He claims he does not like anything about Turkish culture or about life in Turkey. His consistent refusal to learn Turkish is in line with the

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22   Didem, personal communication, 27 May 2014.
23   Didem, personal communication, 27 May 2014.
24   Alberto, personal communication, 27 May 2014.
25   Didem, personal communication, 27 May 2014.
26   Richard, personal communication, 29 May 2014.

separation strategy: 'I constantly get harassed, "Why don't you learn Turkish, you've been married for so long…" I met my wife in England; we had been living in England 7 years before we moved to Turkey, and we never needed to speak Turkish. We still speak English to each other. My mother-in-law and father-in-law, they don't speak English.'[27] His attitude towards the Turkish language, 'it is a useless language, face it, English is an international language',[28] prevents him from mastering it and being competent to fully participate in the society.

Similarly, Jerome (French), an engineer at a large multinational company, who lived twice in Istanbul, where he used to work once and once was between two posts abroad, never attempted to learn Turkish. As in Richard's case, a lack of a common language blocks effective communication with the in-laws, who do not speak English. In both cases, their wives act as mediators, translating back and forth. What is common for Richard and Jerome is that their wives are both having a more positive attitude toward the home country and their temporary stay in Turkey.

The third marginalization case is Tanja (Serbian). In her case, the fact that she had been loosely involved in both sets of families of origin, her lack of proficiency in Turkish, her inability to find a job as a professor of French language and literature, and the refusal of her co-ethnics due to prejudices against Turks, all this contributed to her marginalization. Tanja claims that a group of affluent Serbs living in Istanbul, circles around the consulate, and pilots working for the Turkish Airlines did not accept her due to her marriage to a Turkish man.

Finally, a regression in adaptation can also be possible to occur. Due to her deteriorated relationship with her husband and his parents, Kassia's (Poland) initial contentment with life in Turkey turned into a feeling of resentment. Beforehand fully integrated into Turkish society, she withdrew into separation and became overtly critical of society and culture. The main reason is the perceived lack of help she receives from Turkish in-laws with regard to child rearing.

> My mother in-law is not really eager to take care about Doga too much, not as much [as] she should or could. Last year, I had left him with her only for one night, and afterward she said she does not want to take care of him for a night. I left him again last week, and she called me to come and take him. She is 56 and healthy; she does not like kids, to be honest. She is never involved in playing with him. She does not take him to the park.[29]

Her personal disappointment had led to the disappointment with the country and culture. It is coupled with obstacles to visit her home country and the disinterest of her husband in Poland: 'My husband and son have never been

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27   Richard, personal communication, 29 May 2014.
28   Richard, personal communication, 29 May 2014.
29   Kassia, personal communication, 4 June 2014.

to Poland. It is too expensive to go there'[30] as well as a detachment from her family: 'My parents are divorced, and my mom lives in Italy. Also in Poland some families are very close, I just didn't have that experience.'[31]

Finally, the findings of this research are in line with the proposed theoretical framework. To summarize, in all four cases of succesful integration, there has been a present eagerness to move to Turkey and prior experiences of international travel, as suggested by Burgelt et al.; personal resources (openness toward Turkish culture, devotion to studying the Turkish language, job skills); social support of Turkish in-laws and a wide group of friends and family connectedness, as well as a lack of perceived discrimination and positive social norms exemplified in an easy access to residence permits. In the case of separation from both societies, the decisive factor is a lack of family connectedness and support that caused the withdrawal of the family unit from both societies. Lastly, in the cases of marginalization, the most important factor is a negative attitude toward Turkey and Turkish culture. As a consequence, these individuals are not likely to learn the Turkish language well enough to participate in social networks.

6. Conclusions

My research is in line with Scott's and Cartledge's claim that 'transnational family *milieus* formed from mixed-nationality relationship migration provide migrants with relatively rapid and direct access to host-country sociocultural networks' (Scott–Cartledge 2009: 66). However, the findings of my research contradict the argument of Scott and Cartledge (2009) that love immigrants, unlike other types of immigrants, are expected to go through 'extreme assimilation'. In the author's empirical research on women from Great Britain married to men from France and vice versa, the participants fully adapted to their partner's society and, for instance, 'all interviewees spoke their partner's language at home and only a minority had brought up their children to be genuinely bilingual' (Scott–Cartledge 2009: 77).

Quite the contrary, in my research, English is the most common language spoken between Turkish and non-Turkish partners. Even the participants with a good command of Turkish prefer to speak English with their partners. Moreover, all non-Turkish participants successfully taught their native languages to their children, even in the cases of Serbian and Polish, which are not prestigious and widely used languages. Additionally, rather than becoming members solely of their Turkish partner's social networks, the participants tend to maintain relationships with their co-nationals and other foreigners in Turkey. Instead of

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30   Kassia, personal communication, 4 June 2014.
31   Kassia, personal communication, 4 June 2014.

becoming assimilated (with the exception of Caroline's and Mehmed's case), non-Turkish participants preserve strong emotional and social ties with their countries of origin.

All female participants in my research learned the Turkish language. Nonetheless, no one converted to Islam nor changed their dressing style. In my research, the most common strategy is integration, and none of the participants reported a significant social pressure of any kind. I consider several factors to be decisive.

First, the Turkish partners come from overtly secular, middle-class families, and the families in my research reside in urban, secular areas of Istanbul. As a result, the social pressure on non-Turkish women to change and adjust their behaviours and appearance is low. Moreover, the welcoming attitude of Turkish in-laws is most frequently cited as a favourable factor for successful adaptation to Turkish society. Second, the native countries of my research participants are not far from Turkey. Hence, they can easily maintain strong emotional, social, and even professional ties. Besides, when non-Turkish parents approve a marriage with a Turkish citizen and frequently visit Turkey, they provide crucial support. In addition, the participants reported being friends with other Europeans in Istanbul. The networks of ex-pats represent a specific social space for mutual support.

Finally, personal characteristics (i.e. openness and flexibility), consumption of similar cultural goods, and parity in the educational level of non-Turkish and Turkish partners denote shared lifestyles and values and consequently facilitate integration. In other words, the perceived 'cultural' distance between the partners is low. According to Benet-Martínez and Haritatos, the perception of distance or overlap between two cultures impacts acculturation. The authors argue that 'the perceptions that one's two cultures are non-overlapping, dissociated, and distant from one another is related to more learning- and performance-related aspects of the acculturation experience' (Benet-Martínez–Haritatos 2005: 1040). In my research, none of the participants refer to cultural differences with their Turkish partners. Additionally, apart from mastering the Turkish language, the research participants did not need to acquire particular skills for a successful living in the Turkish society and adopt particular social norms and codes of behaviour.

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