
Transnational Citizenship as Status, Identity and Participation: Comparative Assessment

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1 Introduction

Transnationalisation of individual lifestyles calls for the need to reassess the *modus operandi* of the system of popular engagement into the process of decision-making. As e.g. Pérez-Armendáriz and Crow (2010) have noted, migratory experience can be a process of political learning. This has resulted in the positive spill-over effect of democratic values, giving a hard time for the states of origin that exercise non-democratic measures. But also well-established democracies face new challenges, since their citizens are not fully capable of participating in decisions that affect them most, whereas their field of governance increasingly encompasses citizens or nationals of other states. What are the challenges and what could be the substitute for the modes of civic engagement characteristic to modern statehood?

Citizenship is a useful instrument for studying various dimensions of this issue: it enables us to analyse the extent and composition of individuals' rights and obligations and their discourse and practices regarding those; but also modes of identification with the respective political community and proneness to undertake various forms of participation. It has gained use also in transnationalism studies, for example, under the name of transnational citizenship (Fox 2005; Bloemraad 2004; Goldring 2001; Halfmann 1998; Itzigsohn 2000; Smith M. P. 2007), but has

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empirically been studied mostly in separate aspects: Guarnizo et al. (2003) and Smith (2007) study participation; Bloemraad (2004) concentrates on citizenship status, Soysal (1994) focuses on identification and status in society. This paper aims to take advantage of the well developed political theory on citizenship, and especially the analytical models of citizenship aiming to outline the main problems in the understanding and governance of transnational citizenship. This outline is given in the first, theoretical paragraph.

This paper assesses the transformations of citizenship in migrant transnationalism. It outlines a six-fold analytical model (see also Jakobson and Kalev 2011; Jakobson et al. 2012b), enabling a simultaneous interpretation of citizenship as a status, an identity, and participation both vertically and horizontally. We will analyse transnational citizenship comparatively in four different contexts. The contextual unit that forms an empirical case analysed in this paper, is a “transnational space” (Portes 2003; Colbert 2001; Faist 2000): a sphere of ideas and practices with some geographic coherence, facilitated by an opportunity structure, and extending beyond the borders of “methodological nationalism” (Wimmer and Glick Schiller 2002). This definition is inspired by Faist’s concept of “transnational social spaces”, but encompasses not only social interaction, but economic stock-taking, political motivations and governance regimes, that also shape the context for transnational migration. No doubt, the modern nation state discourse tends to remain alien in various regions of the world. To overcome this, the paper draws on various transnational settings that encompass not only European style nation states, but interconnect them with non-Western countries.

We will compare transnational citizenship in four transnational spaces: (1) Estonia and Finland, (2) Germany and Turkey, (3) Morocco and France, and (4) Indian Punjab and UK. These spaces were the object of study for the Trans-Net research project (see data and methods section). The material for tracking down transnational citizenship will be drawn from migrants’ discourse and practices, but also the socio-economic context and legal framework, which form the opportunity structures of the transnational space.

2 Citizenship

Citizenship is a relational category: as Charles Tilly (1995) notes, it is the central relationship between an individual and a state in a democracy. Of course, conceptualisations of democracy and the state (see e.g. Dryzek and Dunleavy 2009) vary over time and space, hence leaving this assertion rather indistinctly defined. In order to grasp the depth of that “political proverb”, the dimensions of this relationship should be conceptualised. Fox (2005) offers two starting points for determining citizenship: the horizontal and the vertical. From a vertical perspective, citizenship identifies a relationship to an institutional body, e.g. a state, granting the individuals rights and obligations. This is an approach most often undertaken in contributions dealing with legal issues, i.e. citizenship policies, citizen and human rights, etc. However, it also has a more affective side to it, since citizenship as a relationship to the state can reveal itself in an individual’s loyalty or other

Table 1 Analytical dimensions of citizenship

Citizenship as...	... A vertical relationship	... A horizontal relationship
... Status	Passport/other document Formal citizen rights and obligations	Factual membership in a society: belonging into societal interest groups through socio-demographics, work, family, etc.
... Identity	Identification with the state Loyalty to the state	Identification with the <i>demos</i> and solidarity with one's social peers, including loyalty to the nation
... Participation	Doing the citizen's duty: participation in elections, doing military service, etc.	Civic activism: participation in civic associations, protests and rallies for the common good

Source: Authors. (Applied also in Jakobson and Kalev (2011) and Jakobson et al. (2012b))

emotional affiliation to the state (Tilly 1995), and in one's readiness to contribute. From a horizontal perspective, citizenship implies a membership in a political community, the *demos*. This perspective is most often found in sociological addresses of citizen agency, be that of sociological state or citizenship theory, or civil society studies. It overcomes pure formalism and claims that citizenship is based on shared (civic) culture – identity, participation patterns and civil society.

There are also other analytical typologies of citizenship. For example, Sassen (2002) and Goul Andersen and Hoff (2001) have proposed three analytical dimensions of citizenship: status, identity and participation. Here these will be called the “modes of citizenship”. Citizenship as a status defines who is “in” and who is “out” of the political community, granting them rights and obligations respectively. Citizenship as identity indicates a sentimental basis offered by the state or the *demos*. Citizenship as participation indicates the means of negotiating one's status, but also affirming identity. As visible from the definitions above, the three modes are to a certain extent interconnected (e.g. participation enables to negotiate status and identity, status enables rights to participate, identity builds around status and reinforces participation), but can be clearly distinguished in the “horizontal” and “vertical” dimensions. The content of the six dimensions of citizenship proposed is exemplified in Table 1.

However, the content, boundaries and significance of these six dimensions are going through changes caused by transnationalisation and especially, migrant transnationalism. In the course of transnationalisation, citizenship becomes more complex. If an individual moves to another country, still maintaining connections, affiliations and allegiances in her previous country of residence, but also developing new ties in the new country, does the already six-fold combination of vertical and horizontal relationships become (at least) doubled, as the definition of transnationalism (Vertovec 2009) would suggest?

Several studies have indicated that migrants are more like quasi-citizens with some rights being absent, e.g. voting rights (Layton-Henry 1991). Even if granted rights, they don't share the same identity basis with the majority population (Koopmans and Statham 2001, p. 67). However, they should in most cases be

taken into account as bearers of “horizontal” citizen status. According to Yasemin Soysal (1994) the guest workers did not have a passport, or a valid “vertical” citizenship status at the time, but they definitely had “horizontal” citizen status, since they are part of the society, belong into various interest groups, facilitate social networks, and participate through trade unions, immigrant organisations, political initiatives, etc. Their status as transnationals has been particularly emphasised based on the social networks that tend to transcend state borders, and that are maintained even across long distances.

According to Fox (2005), transnational citizenship could be a relationship between an individual and a trans-state institution like the European Union or the United Nations (though this would need reassessment from the perspectives of Bauböck (2003) and Portes (2003), according to whom both of the institutions exemplify internationalism, and not transnationalism) or being a citizen of several states simultaneously – in legal terms, either having a supranational or multiple citizenship. Multiple citizenship is legally permitted by some states, but prohibited in others, hence creating only a scarce opportunity structure for trying out the effects of that in practice. Academic scholarship on multiple citizenship (e.g. Aleinikoff and Klusmeyer 2002; Castles and Davidson 2000) has indicated that it enables emancipation also in other dimensions of citizenship (in addition to “vertical” status), creating equal opportunities for transnationals to be fully-fledged citizens in multiple countries simultaneously. Aihwa Ong (1999) on the other hand elaborates on a tendency of multiple citizenship leading to the devaluation of substantial citizenship, simply maintaining and managing multiple passports that can be used upon one’s convenience, but that will not necessarily bring about a shift (or no motion at all) in the dimensions of identity or participation.

In terms of identity, transnationalism is often opposed to assimilation theory that presupposes an immigrant’s national “melting” into the mainstream identity (Glick Schiller et al. 1992; Guarnizo et al. 2003). Transnationalism supports the perspective of adaptation – an immigrant may acquire a sentiment of belonging based on just the fact of their factual presence, *being* in the society. (Levitt and Glick Schiller 2004). It has been a point of intense discussion in nationalism studies, on whether and to what extent can national affiliations and loyalties toward states be divided. However, migrant transnationalism opens up the grounds for shifting or even multiple allegiances, hence preferring identities that are not hermetically closed as “containers”, but rather, open and overlapping as “spheres” (Pugh 2009). As also an example from the Netherlands (Snel et al. 2006) suggests, transnational networks and integration are not contradictory.

Citizenship as participation depends to a great extent on the other dimensions of citizenship, e.g. what kind of rights or identities they hold. Also the potential shift is the same: “vertical” participation may become supra- or multinational (e.g. voting in elections in multiple states, or electing supranational representatives, e.g. members of the European Parliament), “horizontal” participation may become deterritorialised, e.g. via participation in transnational social movements, or border-crossing, e.g. participation in civic initiatives of both countries (or in the other country). The studies (e.g. Guarnizo et al. 2003; Johnston 2001) report on the migrants as participant citizens in two countries simultaneously, indicating that when given citizenship rights,

also other facets of citizenship might be emerging. However, if transnational citizenship is founded solely on the horizontal relationship, its potential endurance is not expected to be sustained in the long run. As Fox (2005, p. 194) notes, “only a high-intensity, rights-based definition of transnational citizenship holds up well”, thus emphasizing a need for a solid vertical relationship (i.e. in the form of multiple citizenship or supranational citizenship) as well.

The extensive literature on citizen participation informs us of the variety of intensity and forms of agency. A still useful tool for generalisation is Hirschman’s (1970) typology: a citizen can either be actively participant (voice), conform passively (loyalty) or leave the system (exit). Easier migration and transnationalisation make the exit option easier by decreasing the intensives to realise one’s objectives via domestic political competition. Thus transnationalisation seems to be related with a civic understanding of citizenship where the emphasis is not on democratic civic agency and participation. This poses a clear challenge for the mainstream scholarship of democratic participation (see Kalev et al. 2010).

Also, citizen participation involves a spectrum of practices with varying degrees of intensity. Colin Hay (2007, p. 75) differentiates between four main modes on the basis as to whether (a) the citizen participates or not and (b) the decision to (not) participate is seen as a political act per se. If the citizen participates and regards this as political engagement, then this refers clearly to political participation; nonetheless, there is also activity that is not correlated with political orientation that Hay terms *habit* (non-political participation). Citizens can also consciously decide not to participate (political non-participation) or just remain passive (non-political non-participation). Thus political participation is only one possibility for transnationals to get actively involved in the social and political realms.

As our previous empirical analyses (Jakobson and Kalev 2011; Jakobson et al. 2012) on citizenship discourses of transnational migrants between Estonia and Finland have indicated, the prime generalisation concerning transnational citizenship could be that though the depth of citizenship depends on respondents’ individual characteristics, no dimension of the six-fold citizenship model was rarely doubled, i.e. existing in the two countries simultaneously. For example, respondents were in general socially active in one society at a time, even if engaging in vertical forms of participation in the other country; and even if they felt affiliated with both countries of residence, this affiliation was never felt in the same form toward the two countries.

3 Data and Methods

The empirical data used in this article was gathered in the course of the EC 7th framework project “Transnationalisation, Migration and Transformation: Multi-Level Analysis of Migrant Transnationalism (Trans-Net)”. The objective of the Trans-Net project was to clarify and compare migrant transnationalism, analysing the border-crossing relationships in four transnational spaces encompassing eight countries: Estonia/Finland, India/UK, Morocco/France, and Turkey/Germany. Research data was gathered through content analysis of policy documents of each state, semi-structured interviews and life-course interviews.

Table 2 Characteristics of respondents (number of respondents)

		Estonia-Finland		Turkey-Germany		Morocco-France		India-UK	
Place of birth	Estonia	108	Turkey	111	Morocco ^a	101	India	138	
	Finland	46	Germany	59	France ^b	60	UK	44	
	Other ^c	6	Other	6			Other	7	
Gender	Female	89	90	64	63				
	Male	71	86	97	127				
Interviews in total		160	176	161	190				

Source: Authors; abridged from (Pitkänen, İçduygu, and Sert 2012)

^aIncludes respondents of Moroccan origin (incl. some of them born in France) and respondents of French origin born in Morocco.

^bIncludes only respondents of French origin born in France.

^cThe other category contains citizens who have been born elsewhere (e.g. Russia, Denmark or Afghanistan), but hold the citizenship or originate ethnically from either Estonia or Finland.

Since the migratory context in countries varied, all country pairs had some autonomy in deciding on the sample (e.g. the teams of UK and India decided to focus on Indian migrants originating from the Punjab region; teams of Estonia and Finland and France and Morocco portrayed their transnational space by interviewing migrants moving in different directions). Hence the data offer a valuable viewpoint, where transnational migration is truly seen as reflecting on both immigration and emigration. As noted by Levitt and de la Dehesa (2003), analyses of transnationalism otherwise tend to give more attention to the policies of the sending state.

Around 80 respondents were selected in each country from among immigrants, return migrants, commuters and family members of people who move between the two countries (i.e. within the Finnish-Estonian, German-Turkish, French-Moroccan or UK-Indian transnational space). Multiple sampling methods were used for gathering respondents, including using snowball method, personal contacts, phishing in social media, (migrant) associations, information from media (e.g. on public intellectuals, businessmen, etc.), with the aim of creating a sample that would represent both genders, all (adult) age groups, various educational backgrounds and labour groups, and various kinds of migrants (e.g. labour, study, family migrants, refugees, transnational businesspeople, etc.). For more specific characteristics of interviewees, see Table 2. All research teams used a list of interview questions that covered five broader domains, namely, the political, socio-cultural, economic and educational domain, and migration patterns. The present study addresses research questions related to the political and socio-cultural domain.

In the framework of the Trans-Net project, all research teams have compiled country reports based on their results (Trans-Net 2009), and all country pairs have written a joint space report, that has been published as a book in 2012 (Pitkänen et al. 2012). These materials are also the prime empirical basis for our elaboration.

In the current chapter we further utilise the project material in order to examine to which extent there are similarities across spaces. We acknowledge the discussion

being limited by the research design of the Trans-Net project and the scope of the material. The material is re-examined using interpretative qualitative analysis. We go through the main findings space by space, aiming to identify the similar trends in discourses and practices in the conclusive subchapter. The findings are then discussed using the above outlined theoretical framework. We focus on the political domain and assess the similarities across the spaces in citizenship discourses and practices, conceptualising citizenship as status, identity and participation. Additionally, the analysis takes into account the spatial context of the case studies, comparing the rarely analysed intra-EU transnationalism (Estonia-Finland) to the countries of traditional mainstream studies of transnationalism (other spaces).

4 The Finnish-Estonian Transnational Space

An elementary characteristic of the Estonian-Finnish transnational space is the geographical, cultural and linguistic closeness of the two countries, as well as membership in the European Union, the Schengen area and from 2011, the eurozone. The vibrancy of the transnational space is perhaps not as remarkable in population statistics,¹ as is clearly apparent in the manifoldness of transnational activities and migration patterns. A notable feature in many cases, is that the reasons accountable for migration are often multiple. The life courses of several respondents tell a story of a line of reasons that only eventually gave way to migration, because transnational ties are imaginable in this space also without migration.

Yet, the proximity of the two countries is in deep contrast with the vast differences in terms of recent history. A Estonia was part of the USSR, while Finland remained independent and democratic. The Iron Curtain that separated the two countries is the prime reason why the transnational space between Estonia and Finland is rather recent, (again) fully functioning for about two decades. The Soviet legacy can also partially explain the different state strategies of the two rather well developed countries – whereas Finland is most often depicted as a citizen-centred welfare state, Estonia has opted for a neoliberal statist strategy that was rather common among the post-Soviet countries. Another component of the Soviet “legacy” in Estonia is the sizable Russophone population, which to a great extent consists of people who arrived in Estonia during the Soviet period and their progeny. The issue of the post-Soviet Russophone minority is probably also the

¹ According to Statistics Finland (2011a), Estonian citizens became the largest group of official foreign citizens with 29,080 of them (~0,8 % of total population of Finland) living in Finland in 2010. Additionally over 4100 Estonian citizens have been granted Finnish citizenship (Statistics Finland 2011b) and probably the largest number of Estonians in Finland are not registered and are either illegals or commuting continuously between the two countries. According to Statistics Estonia, almost 12,000 Finns (~1 % of total population of Estonia) were living in Estonia in 2000, but this number has been continuously decreasing, reaching 10,500 by 2011 (Statistics Estonia 2010).

reason why Estonian citizenship and immigration policy is quite stringent and restrictive towards immigration. Estonia prohibits multiple citizenship and to a great extent follows the principle of *ius sanguinis*. Whereas Finnish citizenship policy – that was rather restrictive in the 1980s – has greatly liberalised in recent decades (Howard 2009), offering multiple citizenship and quite flexible naturalisation criteria.

These characteristics model the tapestry of citizenship discourses and practices. EU membership is probably one of the most important factors behind the fact that fairly few Estonian respondents (9 out of 108) had opted for Finnish citizenship, and usually prior to Estonia's joining the EU.² The modest importance of legal citizenship has also framed one out of the three more widespread discourses: that citizenship is “*just the passport in your pocket*” (33, male, Estonian, study/labour migrant) or, as another respondent put it, “*It all doesn't matter that much in the European Union*” (28, Estonian, female, work/family migrant). However, citizenship status was often also associated with two other dimensions: with the rights citizenship guarantees, and with the sense of identity. In the first instance, citizenship (and especially Finnish citizenship) was depicted by both Estonian and Finnish respondents as a means of guaranteeing rights, or a “*citizenship of convenience*” (Ong 1999). As one Finnish respondent noted, “*I'm a Finnish citizen. It means me safety. It's some kind of a security license*” (47, Finnish, female, family migrant). But many respondents also stressed the importance of national identity when asked about the meaning of citizenship. To some the two elements were inextricably connected thus giving up citizenship was seen as betraying one's nation, whereas for others they were not (e.g. some Finns who noted that they would take Estonian citizenship also, if it was allowed). Here is an example of the inherently contradictory definition of citizenship by Estonian migrants in the late 1980s and early 1990s:

Back then, everything was very strictly determined. That if you have this and this [citizenship], then you have these and these rights. I didn't want to give it [the Estonian citizenship] up. Everyone actually wanted Finnish citizenship. And back then, you only had to like live there for 3 years and you could get it. But I didn't want it. I can speak Finnish, but I will remain Estonian (50, Estonian, female, family migrant/returnee).

The construction of national identity was rather essentialist, e.g. when asked about who do they feel they are, several Estonian respondents answered with a phrase from a song that was popular during the national awakening: “*Estonian I am, Estonian I will be, when I was created Estonian*”. Similarly, Finnish respondents claimed that “*my substance is Finnish*” (63, male, Finnish, work migrant). Even some respondents with multiple citizenship we interviewed highlighted that their status was primarily related to the cultural heritage of their parents rather than political agency. However, some respondents recalled mutual cultural progeny (being *heimoveljet/höimuvennad* – brothers of the same tribe) or

² however, opting for Finnish citizenship has again increased in the recent years of recession (2008, 2010) (Statistics Finland, 2011)

historical events and how Estonians had fought for Finnish independence and vice versa during World War II. In addition, this was not seen as an obstacle to a transnational lifestyle and adapting to another context – in this case, many respondents cited the Finnish proverb “*maassa maan tavalla*” (broadly translated as: when in Rome, do as the Romans do). In this light, several respondents criticised migrants of other origin, e.g. the Somalis in Finland, who “*have lived there for decades, but who still don’t speak Finnish*” and as one Finnish respondent noted, she now understands “*your problem with Russians*”.

Contrary to the idea of a “simultaneous presence in two societies at once” (Glick Schiller et al. 1992), the interviews proved that despite new technologies, the geographic proximity and the fact that most respondents visit the other country several times a year, most of them retain a significant social network only in one country at a time. Hence, identity proves to be even more important in maintaining the bridge between the two “national realities” than social ties.

The respondents were also asked about the feeling of loyalty towards either country. The response indicates that loyalty was in most cases separate [detached?] from national identification [issues of national identity?]: it was associated with law abidance, doing one’s duty towards the state where they resided, respect for the country’s history, language culture, etc., but also with gratitude for the benefits they have received and having been accepted. Interestingly, loyalty was more often depicted as affiliation with the Finnish state – both by Estonians residing in Finland, Finns residing in Estonia, and even by some Estonian return migrants. Loyalty was based on recognition and feeling of trust toward the Finnish government, probably also indicating the advantage of the welfare state before a minimal state in generating loyalty.

I think my loyalty to Finnish state has increased here. I think I will gladly pay the 35–40 per cent taxes, when we go back, because I think we get something from taxes and here are still some things that you have to figure out and to manage the money and how to divide it and so on (34, female, Finn, family migrant).

Sense of national identity seemed to be so strong among several that some Finnish respondents felt it necessary to add that they feel “*fully Finnish, I can’t even say that I feel myself as a European*”. The main de-nationalised identification they used, was being “a Nordener”. Post-national identification (as a world citizen, cosmopolitan, European) was more common with people who had broader international experience, but who mostly had other ethnic background, e.g. a respondent who originated from Afghanistan, but had received asylum in Finland and subsequently Finnish citizenship. Another respondent, an Estonian citizen originating from Russia noted that “*I am European, but my parents are Russian*” (24, male, Estonian/Russian, study migrant). Another group that in general tended to refuse their ethnic identity or proposed a multiple identity were the so-called 1.5ers (family migrants who are difficult to allocate both among first and second generation migrants). Some of them noted that their lives are enriched by their cultural and ethnic backgrounds:

as a sort of a poluvernik [a multi-culturalist, a syncretist] who makes choices and combines the best elements of both cultures (27, male, Finn, family migrant).

Yet others confessed that they felt somehow ashamed of being Estonian living in Finland:

like a piece of Lego laid in its place./---/Recently, there has been very much negative about Estonians here in Finland. So, it is rather as a Finn or some other European (27, male, Estonian, family migrant).

Questions about civic participation revealed, that even though there was some border-crossing political participation, e.g. voting in elections in their country of origin, being actively involved in a civic association in the other country – participating in *both* countries was not that frequent. Though both Estonians and Finns registered in the other country have the right to vote at local elections and participate in European Parliament elections, this option was only exercised by some Finns residing in Estonia. Most people observed that they don't have time to keep up with politics or vote in both countries. Some respondents even noted that they don't feel they have the right to decide over politics in the other country:

I---/cannot vote in Estonia because I do not have to live under the laws which I have the power to influence. So I think it would be ethically wrong to have an effect to how those laws are made (39, male, Estonian).

However, the difference between Estonian and Finnish respondents in this issue is striking. The Finnish respondents tended to be more active in associational life than Estonians. This means that they have founded a network of associations, including entrepreneurs' clubs, women's associations, a school and a congregation in Tallinn. Through those associations and networks they had been able to have an impact on political decisions that influenced them directly (e.g. organising the Finnish school for the children of more temporary migrants); the Finnish businessmen were able to be engaged in lobbying in both states, and they were also satisfied with the way their proposals were received. Though Estonians remain in general rather passive in terms of associational life (European Social Survey 2010), our results indicated that several Estonians in Finland participate in local, migrant and professional associations, trade unions and even political parties. However, the respondents claimed that this participation did not really make much difference: there were several stories of disappointment with engaging in decision making, e.g. the failure to get funding for minority action, for the Estonian school, or being "used and then thrown over the board" by political parties they had run for in elections. Though the factual reasons behind the disappointments may be diverse, it still indicates the either inappropriate expectations or measures taken to achieve their goals with civic initiative, hence indicating possible shortcomings of civic education. Finland functioned as the kind of a civics school, where new civic skills were acquired.

For the Finns, the associations, the congregation and the school foster the development of diasporic identity and belonging, meaning further strengthening ties with other Finns. However, some respondents had also tried entering associations for social integration purposes and building friendships with Estonians. Though – they confessed – their activities aiming at societal integration were not

very successful since “*Estonia is a network society*” (47, male, Finn, entrepreneur), whereas in Finland socialisation is based more on associational life – community and hobby clubs, local initiatives, etc.

Perhaps, the only truly transnational form of participation was membership in transnational social movement organisations, such as Amnesty International or the Red Cross, as some younger respondents noted. Paradoxically, however, though in harmony with the logic of social networks, almost all respondents who were members in the organisation in their country of origin had not established any contact with the specific branch in their country of residence.

5 The Turkish-German Transnational Space

The major differences between the Estonian-Finnish and the Turkish-German transnational space are the cultural and geographic distance, the presence of the EU border, but also the duration of constant migration from Turkey to Germany. Since this transnational space spans over the borders of the EU, and links two states with rather restrictive citizenship policies, citizenship as a status is much more important than in the Estonian-Finnish transnational space. This is visible first of all in the numbers – out of 176 interviewees, 46³ had German and 32⁴ had double citizenship. The two main discourses that relate directly to the concepts of citizenship in the German-Turkish transnational space – citizenship as a guarantor of rights and opportunities, and an index of identity – were also present in the Finnish-Estonian transnational space. However, in this case, the identity of the country of origin was not combined with an essentialist notion; but rather, the identity of the receiving country. A couple of respondents confessed that they will refrain from any activity leaning towards “naturalisation” if Germany will not allow dual citizenship. As one respondent noted:

I mean, do I receive a brainwash after getting the German passport? Do I get a blood infusion? Will my Turkish blood be removed? (Female, 44, 1.5 generations in Germany) (cf. Gerdes et al. 2012, p. 123)

The main reason for not causing feelings of loyalty/identification with Turkey was corruption and bureaucracy that tended to diminish the sentiments associated with the value of citizenship, but also discouraged people from dealing with Turkish authorities.

Since 1961 when the first intergovernmental workforce recruitment agreement was signed between Germany and Turkey, several generations have witnessed and been part of migration. This might explain why “ethnic identity seems to be declining in importance, while sense of belonging among migrants is becoming a

³ this number includes 8 ethnic Germans

⁴ Double citizenship was enabled for Turkish citizens during a brief period after the new German Nationality Act in 1999.

more recurrent theme” (Sert and Içduygu 2010, p. 39). The fact of a personal identity shift towards the formation of a “migrant” identity can be clearly linked to specific policies and reconceptualised in terms of a “reactive identity” (Vetik et al. 2006). Furthermore, the length of stay abroad correlated positively with an identity conflict, and proved to be similar to Estonian 1.5ers. There were also respondents who understood the construction of a dual national identity and migration background as a positive development; however, in these cases, positive feelings were associated with some positive experience, e.g. qualifying for a job, where the migration background had been considered an advantage instead of a drawback. As in the case of the Estonian-Finnish space, also Turkish and German respondents emphasised the ease of keeping in touch with new communication devices and means – cheap call cards, internet, cheap flights, etc. However, it seems that this does not suggest that transnational contacts would be on an increase. As Gerdes et al. (2012) note, the return migrants rarely retain contacts abroad, and if, then with family members who have also emigrated from Turkey. Hence, rather low enthusiasm for maintaining transnational social networks cannot be viewed as something characteristic to only to the individualistic Northern countries such as Estonia and Finland, but also the Turkish emigrants and return migrants retain limited ties to their contacts in the country of previous residence.

I've been flying [to Turkey] every year in September. But the reason – I have recognized this only later – was my mother, because my mother was always very glad when I was there. As long as my mother was alive and I was living here, I went willingly. And after my mother was dead, I only go every two or three years. For three years I haven't gone at all. It doesn't matter to me whether I go there or not (Male, 49, refugee in Germany).

In terms of “horizontal” participation, transnational activities tended to be marginal, even rarer than those taking place in the Estonian-Finnish transnational space. This can be caused by geographic factors, but even more so due to policies and civic culture. Sert and Içduygu (2010, p. 26) also indicate low interest to participate in civil society organisations, and explain that tendency in terms of a limited understanding of contemporary civil. However, rather energetic movement was reported in terms of activities promoting Turkish culture (e.g., donating to Mosques, organising Turkish food sales, etc.). In the “third sector”, as the civil society of the German-Turkish transnational space should rightfully be called, there are some more active and professional people whose role is to function as the transnational hubs for cultural and political participation. There are several Turkish German associations in Turkey like The Turkish German Businessmen and Academics Association (TAIAD) and the Turkish-German Chamber of Trade and Industry (AHK), and a number of Turkish cultural and political associations in Germany. Such organisations do not recruit a large membership but still facilitate artistic and intellectual mobility, as well as transnational exchange of culture and ideas.

“Vertical” forms of political participation were more popular among respondents; however, they were very restricted, and hence, even less often transnational. As Sert and Içduygu note, the Turkish are keen voters, once they have received the chance to exercise their voting right. However, the Turkish migrants

in Germany face restrictions from both sides: while non-citizens in Germany are not allowed to vote in German elections, Turkish political institutions can only be elected by people residing on Turkish soil. Hence, once the Turkish moved from Turkey to Germany, they usually stopped voting altogether. Only in a couple of cases did the respondents fly to Turkey to exercise their voting rights. (Sert and Içduygu 2010, p. 28).

Although most respondents discontinued being actively involved in politics following their return to Turkey, there were still some cases of policy and politics learning, i.e. putting the political or policy-related experience from Germany into practice in Turkey. For example, a Turkish mayor adopted the “German type” of garbage collection model; another respondent sued the president of Turkey for human rights violation, etc. Hence, though participation rarely was transnational, there are some kinds of “political remittances” moving across borders – advancing civic courage, greater awareness of political rights, and new ideas filtered in, as was also noted in the Estonian-Finnish case.

6 French-Moroccan Transnational Space

The French-Moroccan context is noteworthy for its cultural distinctness – this transnational space connects a Western European democracy of republican values, and a North African monarchy embedded in Islamic beliefs and Arabic and Berber cultures. But the case study conducted by Virkama et al. (2012) is also noteworthy for its focus on migration both ways: from Morocco to France as well as France to Morocco. Though France as a receiving society is comparable to the UK which also has a post-colonial legacy, as is to a certain degree the case of ‘Germany and Finland, Moroccan receiving contexts are radically different from that in Estonia as there is much broader cultural and racial difference making it harder for migrants to be integrated. Hence the space report on this transnational space (Virkama et al. 2012) gives an interesting point of comparison.

Arriving in Morocco is relatively easy for French – since they don’t need a visa and are generally not obliged to jump through extensive bureaucratic loopholes, and in most issues one can communicate effectively in French language. But it has proved practically impossible to be integrated into the host society and its political life. For the Moroccans, the visa application processes and the various permits normally required is a much more complicated issue, albeit the process of integrating adaptation have become easier over time, due to the expanding Moroccan diaspora.

Hence, in the present study the French in Morocco is the group with the weakest “horizontal” citizenship relationships. Most of the French respondents had moved to Morocco due to family, or life-style reasons – for example seeking a comfortable climate, trying to continue the lifestyle of their parents, or wishing to escape the thick French welfare state. They have not learned Darija [i.e. Moroccan] Arabic, and none of them were Moroccan citizens (except for one dual citizen by birth). As most of them noted, they could not get Moroccan citizenship due to the highly restrictive citizenship law, but also only two respondents out of 60 reported that

they would like to obtain Moroccan citizenship. Denial was explained in terms of the poor ranking of Moroccan political system, referring to such elements as “lack of freedom”, “corruption”, “women’s status” and “subjection to the king” (Virkama et al. 2012, p. 75). But also, they highlighted a convenience factor meaning that French nationality enables them to cross borders easily, and there are few practical restrictions on non-citizens in Morocco causing problems in everyday life.

Most French respondents expressed indifference toward Moroccan politics, and preferred to remain politically passive – both in terms of “horizontal” as well as “vertical” citizen participation dimensions – but also noted the impact of restraints to vertical participation.. Though this was not due to a generalised indifference to politics – many of them were well informed of political affairs in France and voted in presidential elections– but rather due to feeling isolated and being outsiders in the Moroccan social and political context. (Virkama, et al. 2012, p. 77). It is worth observing that political passivity was not only the result of lacking Moroccan citizenship, but also because of religious differences (apart from a few exceptions they were not Muslims). Religion proved to be a much more important top-down relationship for many than the “vertical” relationship to the state.

Most of the French respondents identified themselves as “French” and moreover as “Europeans” and Western, all insinuating or directly pointing to the ethnic and cultural boundaries between them and the Moroccans, rather than to national or territorial confines. Being French was associated to their linguistic heritage, French culture and enlightenment values, and not so to the French Republic as an object of political affiliation. Neither were the French republican citizenship values expressed, since those remained far from them, confined territorially to France. As one respondent noted:

Am I French? Yes, I speak French, my parents are French. I have an attachment to France, but I have no patriotic pride. In fact, I think I do reject what is Moroccan. It is a rejection of their values. They are very archaic, and it deeply bothers me. If we speak of values, it would rather be the French values, the values of the Enlightenment, the beautiful French values, the great western philosophical values – undeniably (female, French born in Morocco).

In the case of the French in Morocco, societal exclusion can be interpreted in terms of their lifestyle models and attitudes. As noted by respondents, they will always remain *gawria* (a foreigner) for the Moroccans, and that “*Moroccans say ‘You’re a Moroccan’ out of kindness. It’s nice, but they don’t believe it for a moment.*” (female, French, Born in Morocco). However, they did not demonstrate any concrete willingness to get integrated into the Moroccan society (*ibid*). Rather, the French in Morocco had learned to capitalise their “otherness”. Several respondents noted that they had been offered jobs or other positions simply because they “looked French”. Similarly, coming from France and dressing and behaving like French was considered as an important capital also by Moroccan return migrants (*ibid*).

The profile of Moroccan migrants in France was radically different. Though most of the interviewees had arrived in Morocco holding student visas or for purposes of family reunion, there were also economic and political reasons behind

their arrival – the latter included ideological, civil (human rights violations) as well as socio-culturally embedded issues, such as the family's anticipated reaction to one respondent's homosexuality. Migration incentives were also described in terms of a more adventurous and cosmopolitan drive – the motivation to see the world and experience another culture in an in-depth way.

Their migration motivation, slightly different from the Turkish, may also explain their participation patterns – in addition to voting in elections in France, which many of them exercised (yet, interest in politics and participation in elections back home was again reported low), the respondents of Moroccan origin were more often than respondents from other countries involved in human rights activism, such as supporting political prisoners in Morocco, and participating in demonstrations against racism, the Israeli occupation of Palestine, the wars in Iraq and Afghanistan, etc. (*ibid*, p. 76). Additionally, the respondents were members of trade unions, and associated with migrants' associations for Maghrebi immigrants, although the younger generation of migrants was generally more interested in professional or hobby clubs than in politically oriented associations (*ibid*, p. 87).

Participation patterns can be explained, to a certain extent, by identification patterns: the Moroccan respondents expressed solidarity with other ethnic groups living in France, e.g. the Algerians, but also with people from the same hometown or region. The respondents featured both people who felt they belonged to France as well as people who felt they belonged to Morocco. However, the sense of belonging was usually explained by social or cultural lifestyles, and not political loyalty and citizenship. (Virkama and Kadri 2010) However, there were also informants, mostly among the politically more active people, who identified themselves as world citizens. Also the cultural heritage of Islam was seen as fostering cosmopolitan identity. Identifying oneself as European was practically inexistent, even though the life projects of several Moroccans in France were projected towards Europe, proving that the European identity can in a trans-continental transnational space – resemble an ethnic or racial boundary that is rather hermetic and exclusive, in opposition to a political identity that should be inclusive and open for everyone willing to make the efforts needed for joining. Citizenship discourses among Moroccans resembled the discourses of Estonians and Turkish: some of them interpreted naturalisation processes as expression of disloyalty to their country of origin, but ethical and cultural dilemmas seems to be dissolved as pragmatic reasons intervened, such as such as freedom of movement, better access to employment, etc. Among the respondents in France, one third had French citizenship and one third had double citizenship, and some were considering or already going through the naturalisation process during the time of the interviews.

7 Punjab-UK Transnational Space

The UK-Punjab transnational space provides the case study encompassing the broadest geographical span within a transnational space, and is also characteristic due to the religious affiliation between the migrants: the majority of interviewees

(154 out of 190) were Sikhs. Whereas Islam gave the migrants in the two other transnational spaces a basis for solidarity and even cosmopolitan self-definition, Sikhism in comparison is an exclusively contained religion on the global scale, and thus provided a very strong basis for identification and differentiation from others.

Due to geographic distance between the two localities within the transnational space, transnational practices had to do mainly with migration, save from occasional vacations and returns (as opposed to Estonian-Finnish transnational space, for example). However, the defining feature behind migration motivations is the notion of mobility, as Qureshi et al. (2012) argue, rather than poverty, striving for educational development or family reunion. Qureshi et al. differentiate between migrant groups according to the time of migration (“old-timers”, “British born” and “East Africans” of multiple migrations background vs. “freshies”) and note that the attitudes of earlier migrants toward newcomers are rather restrictive: the newcomers are often associated with illegal or just dodgy immigration schemes, low willingness to adapt and integrate. On the other hand, interviews proved that the “freshies” are exceptional networkers, who – contrary to most other migrants irrespective of the transnational space – simultaneously maintain their connection with their peers back in Punjab, invest into building a network in the UK (as well as elsewhere), where their connections allow them to do so. Hence, leaving Punjab is no more just an issue of leaving for the UK and perhaps returning after earning enough money, but can be interpreted by employing a new sociological category: as a manifestation of “youthful masculinity” which provides a viable solution by Punjabi youth themselves (Qureshi et al. 2012, p. 26).

What kind of a “vertical” status would such “inbetweenness” require? All of the respondents settled in the UK had taken up British citizenship, or as they called it, “the passport” (*ibid*, p. 39), which was valued in terms of welfare entitlements as well as easier travelling to third countries – yet, some respondents had encouraged their wives to retain Indian citizenship with an eye to maintaining agricultural land or the inheritance rights back in India. The toolbox of policies India has developed towards its emigrants and diasporas, offering various statuses (e.g. being a Non-Resident Indian, or an Overseas Citizen of India), that as Qureshi et al. note, is implementing a reaction to Nehruvian exclusionist policies, albeit a belated one. Though many programmes of the Indian government such as Scholarship Programme for Diaspora Children, or the Know India Programme provide ground for redefining the nation in a non-territorial way (2012, p. 33), the programmes were not highly appreciated or recognised by respondents. The NRI, PIO and OCI statuses were of interest to a minority of interviewees, namely those who were doing business in India, or constantly commuting between the two countries, or willing to purchase property there. However, this did not carry any sentimental value for the respondents, or no “vertical” identity in terms of citizenship. Rather, they expressed disappointment with the new status, which deprives them from rights to political participation, but they also complained over the lack of civil rights, e.g. the right to the protection of their property. Some respondents even complained that the new statuses are a trap, because the Indian state is trying to take advantage of them through granting them various statuses. Varying definitions of “vertical” status in the UK was in some cases taken with gratitude: some

respondents had used the opportunity to take British citizenship, but retain their Indian nationality. However, this was clearly a minority.

I am a patriot. I have always remained as Indian. I and my wife have Indian passports, we have Indian nationality. We have never left it. Q: You went there in 1968 and your family joined you in 1972, you didn't take citizenship there yet, how did you survive such a long time? I became a citizen after 1 year. I never changed my nationality. One has to take citizenship otherwise you don't get benefits, even medical benefits (Male, 70, "old-timer" on vacation).

Otherwise, no identification concerns with taking British citizenship were raised. Rather, respondents expressed their desire to naturalise as soon as possible, since there is interior prejudice against newcomers within social groups of Indian origin. Hence, "British citizenship was not only prized for the pragmatic benefits such as welfare entitlements, ease of travelling, but also for its symbolic meaning, since British is so much more desirable than Indian." (Qureshi et al. 2012, p. 40). However, many respondents still found it difficult to identify themselves with the UK, due to the "whiteness" embedded in British identities, and hence, some respondents were thriving towards other options:

I think this is my home. It's the only home I've got, anyway, I don't fit in there [India] any more either. Maybe that's why I'm drawn to the USA more than here. I could give up Englishness or Indianness and become an American – they allow you to do that. In my mind I think I'm English, but well, am I? Why can't people say yes, be proud this is your home? (Male, 40, British-born).

As noted above, the identity of the Punjabi is rather distinct from other Indians in the UK. Religion was also the factor that prevented the growth of feelings of national solidarity with India since they had rather negative historical memories of persecution. Hence their full allegiance/loyalty is associated with Britain and this was emphasised often through narratives of historical memory (Punjabis served in the British Indian army during the two World Wars) and the self-identity of the Punjabi as the loyal marshal race. As also evidenced in the Estonian-Finnish space, several respondents had generated a reactive identity toward other minorities in the UK, and projected themselves as a prosperous, well educated and integrated model minority (*ibid*, p. 43). Such an improved model of identity was also central to the UK Punjabi identity culture celebrated in the forms of ceremonies. However, also the Punjabi community featured the community level of "horizontal" participation, namely, the *gurdwara* committees. These were often led by migrants who resemble the Moroccan political refugees, and were also engaged in human rights activism back in Punjab.

Conclusions

Based on empirical accounts of four transnational spaces, transnational citizenship resembles more a dual national citizenship rather than a qualitatively new formation, but demonstrates that the horizontal and vertical loyalties and arenas form a functionally differentiated model of agency in the two nation-state settings. In many aspects transnationalisation seems to be reinforcing the erosion

rather than constructing a new foundation for civic initiative and affiliation (see also Kivisto and Faist 2007).

In most cases among the respondents, migration is triggered by either economic or social factors whereas the impact of political factors is rather rare. Hence, the preconditions for transnational political activism are scarce, and we can rather witness the movement of financial and social remittances as the everyday practice of a transnational space, and not practices associated with either horizontal or vertical citizenship. Though migration sometimes gives an input into the political domain in the form of new civic skills or the empowerment of return migrants, we are still rather far from talking about a transnational political space or a full-fledged transnational citizenship. Rather, as was demonstrated in the four case studies, transnational citizenship means freedom to choose between the loci of political identification and participation (see also Table 3).

The cultural, political and social contexts of all four case studies varied, and also had an impact on the different dimensions of citizenship. Reactions to more exclusive identity politics practised in the framework of citizenship policies but also in other contexts, have resulted in distinct migrant identities opposing the mainstream society or specific groups of “others”. And this was not an issue concerning only national identification, but also supranational identities – whereas European identity was too broad and alien for the Finnish respondents, it remained too restrictive for Moroccan respondents. On the other hand, Islam seems to be a factor that brought them closer to a cosmopolitan identification as world citizens. History also played a part in crafting transnational loyalties: the Punjabi and Estonian respondents have been recalling that they had fought for the same purpose with the British/Finnish.

Despite differences, some similarities between the case studies can be outlined. First of all, in practice membership in one society at a time (horizontal status) seemed to be a rule rather than exception. Though people always retained some transnational networks, especially to their kin, the networks that tended to foster bridging social capital, faded over time, despite new communication technologies available. However, transnational citizenship as horizontal status still grants the individual the choice to be attached to a society toward which the feelings of belonging are experienced.

The interviews also demonstrated that political participation is in most cases confined to one state or society, and hence, does not support the idea of multiple political membership. To an extent, this is the result of restrictive citizenship policies that confine citizenship to a vertical status. For example, the Punjabi respondents expressed disappointment over the fact that Non Resident Indians were not allowed to vote in India.

But usually political participation was associated with social factors, practical considerations and convictions. Even if granted the right – as in the Estonian-Finnish transnational space – it was used only by a small number, because people usually find it too time-consuming to be engaged with politics in multiple countries. The prime transnational political activists tended to be people who had migrated due to political reasons (e.g. from Morocco or India), and the

Table 3 Summary of findings from the four transnational spaces

		Estonia-Finland	Turkey-Germany	Morocco-France	Punjab-India
Status	Horizontal	Networks in one society at a time despite frequent travel	Networks in one society at a time except family	Difficulties in integration and refusal from it among French Networks in one society at a time	Networks in one society at a time, except for “freshies”
	Vertical	EU citizenship, perceived instrumentally. National citizenship as manifestation of identity	Turkish, German and double citizenship. Protest against German assimilative citizenship policies	French cannot get and don’t want Moroccan citizenship. Moroccans citizenship status depends on duration of stay and return plans	Mostly British citizenship among more settled migrants. Incredulity toward Indian statuses
Identity	Horizontal	Rather primordial ethnic identity; reactive identity toward other minorities. Identity problems of 1.5ers	Migrant identity; only in some cases positive double identity. Reaction toward German identity	French identify through language, culture and values as French, European or Western. Moroccans identify as immigrants, muslims or world citizens	Religious/regional identification, identification as model minority. Hard feelings over “whiteness” of British identity
	Vertical	Loyalty toward the state of residence, but more toward Finland	Hard feelings over German naturalisation policy. Guilt over giving up Turkish citizenship	French – no allegiance to either state. Moroccans – religion a more important vertical relationship	Collective id: martial race loyal to Britain; On individual level, patriotism toward either state rather rare.
Participation	Horizontal	Participation in diaspora and local civic associations. Finnish more active. Paradox of national transnational associations.	Participation in migrant associations maintained via transnational hubs of political activists	French not participant; Moroccans active in migrant associations and transnational human rights movements	Participation in migrant civic associations and transnational human rights movements Patriotism rallies
	Vertical	Voting in one country at a time or not voting at all	Voting in Germany or not voting at all due to restrictions	Voting in one country (mostly France) at a time or not voting at all	Voting in UK or not voting at all due to citizenship

Source: Authors

political activists often functioned as transnational 'hubs' for political participation and associational life.

Migration is an option for political exit or "voting with their feet" in Hirschman's (1970) model of citizen participation. In concordance with this, transnational activities concentrate on the specific domains of migrant associations and migrant issues. Thus transnational participation is usually not focused on mainstream democratic politics and could be rather characterised as habitual in Hay's (2007, p. 75) terms. When aiming to enhance full transnational participation it is necessary to endorse political skills and engagement in addition to general social, economic and cultural empowerment.

Even if citizenship as participation and citizenship as "horizontal" status were in most cases not practised fully transnationally, the identity issue proved to be rather a matter of flexibility. Having a primordial ethnic identity, feeling loyalty to the Finnish state and behaving as an EU citizen was nothing alien to Estonian respondents. Also several respondents from the Turkish-German, French-Moroccan and the *desis* in the UK-Indian transnational space cited their double identity as something positive. However, this can again be restricted by policies, and become more vulnerable for the second generation of migrants, in some cases (e.g. Estonia-Finland), already for the 1.5ers.

Transnational citizenship, as contemporary practices of migrants indicate, is comparable to the classical nation-state citizenship. In contrast to some theoretical accounts, our findings indicate quite modest practices of transnationalism. Transnational citizenship tends to follow the pattern of the liberal rather than the republican stream in citizenship policy – that a citizen does not necessarily need to be actively engaged in political processes, but rather needs to retain the right to intervene in questions important to her. This is an evident challenge for the mainstream scholarship of democratic participation that usually emphasises that citizens should engage in a wide range of political issues.

A more republican citizen identity is hard to maintain in as much as transnational citizens are attached to several states and cultures at the same time. Patriotism and willingness to make sacrifices to the demos or the polity as a (unique) whole cannot be the only defining feature of the state-citizen relation, since these entities are more and more difficult to define and incorporate in one's self-identity. Thus there is a significant space for reconfiguration of the reference points of political identity and participation in case of transnational citizens. In fact, there is no sustainable escape from politics. Migrants develop some kind of public interface including political aspects. The opportunity structure for this is of course still defined by the states.

The role of the European Union for transnational agency becomes clearly visible contrasting the intra-EU space between Estonia and Finland to the other, more conventional transnational spaces studied in the Trans-net project. The European rights of free movement, residence and work foster both circular migration as well as living and being active in two countries simultaneously. As people are more empowered, this leads to more informed and more effective adaptation strategies.

The transnational space between Estonia and Finland has also significantly smaller cultural and welfare distance that fosters migrant agency. The cultural proximity and EU multi-level governance framework in the Estonian-Finnish transnational space widen the political liberties and opportunities accessible for migrants while primordial ethnic identification does not necessarily mean undermining other types of solidarity. However, it could partially depend on the novelty of the Estonian-Finnish space. In other transnational spaces the cultural tensions tended to aggravate over time.

The better status of people in intra-EU transnationalism doesn't necessarily mean active civic or political participation and fast adoption of multiple societal identities. People can develop their personal mix of discourses and practices that could differ from both of their countries. They can also opt for accommodation strategies that are not politically or even publically aware but oriented to peers and working place.

Given this, one can't neglect the legal and practical benefits for migrants and citizens in case of intra-EU transnationalism. These form the ground for substantial multiple citizenship and some people also practice it. However being active in several countries needs much energy. Thus developing full multiple citizenship is a vast endeavour.

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