

Citizenship Policies Between Nation-State Building and Globalisation: Attitudes of the Decision Makers in Estonia

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Abstract

In the following article, we examine the positions of the decision makers of Estonia on multiple and European citizenship. The Estonian case offers good opportunities to discuss the structuring of the field of citizenship in the context of a country that is building up a European style nation-state but that has to simultaneously adjust to the changes in statehood usually characterised as globalisation and Europeanisation. The article is based on a survey conducted in 2003-2004 in eight countries: Estonia, Finland, France, Germany, Greece, Israel, Portugal and United Kingdom. We will first briefly characterise the socio-historical context of Estonian citizenship policies, then discuss the results of the empirical research, relate these to wider trends and draw some conclusions.

Keywords: citizenship, multiple citizenship, nation-building, post-communism, Europeanisation.

Introduction

Many scholars have argued that there are significant differences between the Western and Eastern European models of political development and citizenship (e.g. Gellner 1983, 1997, Brubaker 1992, 1996). There is considerable work on the general parameters of distinction; however, much work needs to be done to develop a deeper understanding of the Eastern context. The relevance of citizenship-related questions has significantly risen after the European Union enlargement, which led to an extended common political space.

In the following article, we investigate the positions of the decision makers of Estonia on multiple and European citizenship. The Estonian case offers good opportunities for examining the structuring of a field of citizenship in the context of a country that is building up a European style nation-state but that also has to simultaneously adjust to the changes in statehood usually characterised as globalisation (see i.e. Waters 2001, Sorensen 2004) and Europeanisation (see i.e. Graziano, Vink 2007, Lister, Pia 2004; Bauböck *et al* 2009). We will first briefly characterise the socio-historical context, then discuss the results of the empirical research and draw some conclusions on the basis of the discussion.

The consolidation of the European Union brought significant changes to how nation building and citizenship policies are tackled. Nation-state building in Western Europe became more pluralist and liberal norms constrained what states could do in the domain of immigration and citizenship policy. A shift in perspectives from the nation-state based paradigm, connected with a 'national functionalist' assumption towards a more complex post-national paradigm, took root (Roche 1995:31; Østergaard-Nielsen 2008).

These intellectual developments, and we should consider them as such, made very little impact on the political and mental development in the hemisphere that was controlled by the Soviet Union (Joppke 2002:436). Massive control over borders and freedom remained the main priority in the totalitarian states, despite of the rhetoric about the 'power of the people'. There was no place for citizenship as a capacity of the recognised and potentially active membership of political community, defined by power sharing between members of the community.

In this perspective, revolutions in Central and Eastern Europe could be also called 'revolutions of citizenship' (Di Palma 1991). But today it is hard to figure out what exactly has been reappropriated.

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Differences between Central, Eastern and Western Europe in terms of understanding the essence of citizenship remain significant. These societies very clearly didn't fulfil all the requirements that are ascribed to 'civic systems', characterised by both high political institutionalisation and social mobilisation from below (Morawsky 1993).

The same can be observed in the perception of citizenship. In the post-communist East Central Europe, re-institutionalisation of citizenship generally took place oppositely to the model that was described by T. H. Marshall in his ground-breaking study. This model got the label of 'reverse incorporation'. Soviet time welfare provision, in a way a kind of social citizenship supplied by the state was de-legitimated as 'state-socialist'. Pro-unemployment, inegalitarian, ultra-liberal, etc., attitudes stemmed along with personal interest calculations also from the rejection of the Soviet type welfare regime.

It was expected that the establishment of full civil and political rights will legitimate many of these rights that were associated with 'real socialism' and may once again temper class inequalities fostered by transition (Kolankiewicz 1992:141-162). But return to 'normality' is not as straightforward a process as just 'nacholende Revolution' as Habermas called it and as was expected by many scholars. Today it is sure that East Central Europe makes a case *sui generis*, it has a path of its own, and innovations in these countries contribute to the traditional 'standard' developmental models.

Citizenship studies and the re-historisation of the Baltic area

The essence of the institution of citizenship in every particular region of Europe looks to be significantly dependent on history and political culture. Ernst Gellner, Jenö Szücs and other scholars have referred to Europe's three different 'time zones', major political, economic and cultural lines that continue to present serious obstacles to European unity (Isin, Turner 2002:305). It has also been demonstrated that the conception of national citizenship exerts major influence on both the legal order and on the political and social practices (see i.e. Brubaker 1992, 1996).

The focus of scholars has very much been on the supposed impact of the mystical *Homo Sovieticus* and that of the ethno-nationalist movements on the democratic development of these countries. But we know relatively little about the fundamental institution – 'Soviet citizenship' – a common nominator for the complex of relations between individuals and different societal structures in a Soviet type society. The impact of this institution is one of the factors that also today shapes perceptions of the European Union and particularly EU citizenship by the Estonians. There are good grounds for agreeing with Juris Dreifelds (1996:6) that the "Baltic republics represent unique hybrids among the former communist states, differentiated from Eastern Europe on one hand and the remaining former Soviet republics on the other."

A more historical perspective challenges an instrumental approach according to which the Baltic citizenship controversy is basically some kind of an 'ethnic issue' or a transitory human rights issue. A more cognitively oriented account should not only discuss questions on "whether Baltic States do or do not match up to some abstract standard, but how regional crises can be averted" (Danjoux 2002:35). **The shaping of a complex citizenship, more similar to a contemporary Western European standard, is one of the problems that is of continuous interest and concern in this context.**

In terms of determinist teleology, communism was a totalitarian system and post-communism is no more than a moment in the transition to 'norm' and abnormalities observed in the Baltic States (and all Central and Eastern European countries) are of little academic interest. From the perspective of understanding the Soviet regime more historically and ascribing to Baltic nations a status of historical nations, interest in post-colonialism turns out to be a *sui generis* system, something semi-permanent – transforming, but subject to inner changes (Schöpflin 1994).

During the Soviet occupation and annexation from 1944 to 1991, Estonian national citizenship was abolished. During the period of occupation, no limits existed for Soviet citizens on moving and settling on the Estonian territory. Citizenship of the Estonian SSR was just declarative. The immigrants from the regions of USSR, who were not of ethnic Estonian origin and who entered Estonia *en masse*, actually enjoyed extraterritorial cultural autonomy. In terms of citizenship, we can speak of the formation of

two segmented communities within the Estonian borders: the community of natives patterned by mainly local cultural citizenship and the imperial frame patterned the community of *Homo Sovieticus* (Danjoux 2002:36-38).

Annexation resulted not only in dramatic change in the ethnic composition of the territory (presented in table 1), but also in the encampment of communities, dominated by one or the other type of perceived citizenship. Ideas about the necessity of starting at least a partial decolonisation of Estonia after the restoration of independence reflected not only the different legal status of people (nationality), but different frames of citizenship that defined different identities as well.

Table 1. Ethnic composition of the Estonian population 1934, 1989 and 2000

| Ethnicity | 1934 | | 1989 | | 2000 | |
|---------------|-----------|-------|-----------|-------|-----------|-------|
| | Number | Share | Number | Share | Number | Share |
| Estonians | 992 520 | 88.1 | 963 281 | 61.5 | 930 219 | 67.9 |
| Russians | 92 656 | 8.2 | 474 834 | 30.3 | 351 178 | 25.6 |
| Ukrainians | 92 | 0.0 | 48 271 | 3.1 | 29 012 | 2.1 |
| Byelorussians | | | 27 711 | 1.8 | 17 241 | 1.3 |
| Finns | 1 088 | 0.1 | 16 622 | 1.1 | 11 837 | 0.9 |
| Total | 1 126 413 | 100.0 | 1 565 662 | 100.0 | 1 370 052 | 100.0 |

Source: Eesti Entsüklopeedia, 11th volume, p. 253

The material presented in the table also reveals a more contemporary problem. During the period of restored independence, the Estonian population has decreased by 195,000 persons between 1989 and 2000 both as a result of a low fertility rate and emigration. In the early 1990s, emigration reflected the readjustment in terms of the withdrawal of the Soviet military and their families; however, it also included some of the recently settled industrial workers creating labour force difficulties in their respective areas. In more recent years, workers in several of these areas have emigrated to Northern and Western Europe.

From the perspective of the future, it is not enough to characterize the Soviet regime in terms of liberal citizenship as a totalitarian system. As Olivier Danjoux has revealed, “the republican theory of citizenship is useful to understand the workings of citizenship in the Soviet context, which was hallmarked by an absolute rationalisation of the relation between the citizen and the state. At the same time we saw that radical republicanism was not all there was to the Soviet conception of the citizenship. The rationalising ambitions of that conception were to a surprising extent, corrected and indeed, contradicted by the principle [...] of group-based rights. For mostly ideological reasons, the republican atomisation of Soviet citizenry was counterbalanced by a complex array of collective divisions entrenched in law. That radical disconnection of citizenship and nationality [...] eventually sowed the seeds of demise of the Soviet state, when a number of groups, among them the Balts, began to try and make nationality and citizenship congruent again”(Danjoux 2002:323-4).

In this context, Estonian nation building or ‘transition to normality’ consists of or breaks down into three main episodes. The first period or the years 1988-1995 can be interpreted as a period of reconstituting nationality, while the second dealt with the consolidation of nationality as citizenship. While nationality refers to the membership and subjection to state law and power, citizenship refers to the notion of a collective self-determination, the freedoms and rights guaranteed by membership in a political community (see also Faist 2007). It must be remembered that important differences between these two types of institutionalization of citizenship were not reflected in public discussion, as demonstrated also in our study.

The third period started in 2001 with the launch of the pre-accession period to the EU. The inter-state aspect in the Estonian citizenship policy was represented by the interrelated security and political policies of the EU, the OSCE, the Council of Europe, which became more visible. Imposed political standards on citizenship legislation, minority protection and human rights, as well as their

framework of inter-state mediation and consultation started to contribute to the shaping of nationality and citizenship policies of Estonia.

Re-enacted in 1992, the Estonian Citizenship Law (1938) defines citizenship as nationality, as a legal status that will be granted on the basis of relatively liberal procedures irrespective of ethnicity. The criteria of applying for citizenship are based on individual achievements and thus, every willing applicant can meet these criteria. Estonia uses (and has always used) moderate *ius sanguinis* with a recently introduced complementary *ius soli* in the case of children born in Estonia.

At the same time, the post-independence Estonian governments have pursued a heavily liberal social policy based on the assumption that the best way to ensure the employment motivation of the population and to treat people equally is not to provide significant social benefits. In this context, it is hard to speak of social citizenship in Marshallian sense (cf. Marshall 1992), as the benefits are limited but accessible irrespective of nationality. With regard to the relation of the discourses on social citizenship and social aid, the Estonian public understanding is somewhat comparable to the American one (see Fraser and Gordon 1994).

An important but largely underestimated aspect is the restitution of nationality to former de-nationalised citizens. Such kind of underestimation is a source of confusion that is revealed when Baltic post-communist transition is discussed. In the context of the post-communist nationalist surge, this practice was not simply a necessary legal reparation for past injustices; it was also seen as a means of recreating the pre-communist citizenry and national community and as a means for the restoration of national identity, lost under the regime of Soviet occupation. The gap between the political visions of recreating the inter-war national 'imagined community' and the far-reaching practical complications this project generated led to a multitude of political and legal-procedural complications, with wide ranging domestic and international implications. In this respect, Estonia and other Baltic states share parallels with many post-communist Central and Eastern European countries (see also Iordahi 2009:178).

Estonia has secured its legal independence, but there still remain challenges to establishing statehood in terms of in terms of citizenship, i.e. a cohesive political community. Transformations of the Soviet regional administration into the administration of the Estonian state gave birth to a 'nationalising state'. At the same time, Estonia is opening up to the post-modern socio-cultural context and an increasingly globalised world. What do the people make out of this, keeping in mind that accession to the EU adds a 21st century flavour to the above mentioned dimensions?

Based on this background, we will discuss our main findings of the Estonian survey in three stages after presenting the main background information of the survey.

1. General attitudes on dual (multiple) citizenship and citizenship.
2. The content of citizen rights and duties as indicated by attitudes with respect to dual citizens.
3. Attitudes on the European Union citizenship.

There is a possibility that the results presented will be used to understand the situation in new EU member states from Central and Eastern Europe more generally. While many patterns are likely to be broadly similar, caution should be exercised. Some trends may occur only at a national or the Baltic regional level.

General description of research

The following discussion is based on a survey conducted during the EU 5th Framework Programme research project 'Dual Citizenship, Governance and Education: A Challenge to the European Nation-State' (D.C.E.). The DCE project aimed to clarify state policies and their implementation in the area of citizenship, with an emphasis on multiple citizenship.

The data were collected in 2003 in eight countries: Estonia, Finland, France, Germany, Greece, Israel, Portugal and United Kingdom. The number of respondents in Estonia was 208 and 4 main subgroups of decision-makers were targeted: (1) members of parliament, (2) national (central government) officials, (3) local authority officials, (4) leaders of civic society.

The data was collected by interviews on the basis of a questionnaire containing mostly multiple choice questions, but there were also some additional open questions. Multiple choice questions was chosen in order to ensure comparability, but the additional open questions offered better understanding of the context of the answers. In addition to the common DCE questionnaire, some country specific questions were included in order to investigate more thoroughly the identity aspects of citizenship.

The composition of the main groups of respondents refers first of all to the individuals and professional groups that are likely to be engaged with citizenship issues (leading politicians, governmental officials, NGO leaders, local government officials). The distribution of the 208 respondents according to occupation, ethnicity and gender was as follows.

Table 2. Distribution of respondents of the Estonian survey by occupation, gender and ethnicity

| | Gender | | Female | | Ethnicity | | Other | Share | Total |
|---------------------------|-----------|-------------|------------|-------------|------------|------|-----------|-------|------------|
| | Male | Share | Share | Estonian | Share | | | | |
| Members of Parliament | 32 | 86,5 | 5 | 13,5 | 34 | 91,9 | 3 | 8,1 | 37 |
| Ministry officials | 18 | 34,6 | 34 | 65,4 | 48 | 92,3 | 2 | 7,7 | 52 |
| Local authority officials | 27 | 44,3 | 34 | 54,7 | 56 | 93,3 | 4 | 6,7 | 62 |
| NGO leaders | 12 | 44,4 | 15 | 54,6 | 23 | 85,2 | 4 | 14,8 | 27 |
| Other | 10 | 33,3 | 20 | 66,7 | 28 | 96,6 | 1 | 3,4 | 30 |
| Total | 99 | 47,8 | 108 | 52,2 | 191 | | 14 | | 208 |

Source: Estonian DCE survey data, 2004

The selection technique we used can be labelled 'probability sampling' (based on the available information). Generally, the main ethnic, gender and other divisions in society were observed and in broad terms achieved. Alongside e-mails, telephone calls and letters, personal contacts played an important role in the distribution and collection of questionnaires. About half of the delivered questionnaires have been returned.

In the national parliament, the aim was to have a proportional representation of all the parliament parties. In order to achieve this, we systematically contacted the staff and members of all the factions of the parliament. On a very broad scale, the main structural qualities of the sample which represents parliament members (ethnic composition, male/female ratio, education, age groups) also corresponds well with the structure of the parliament. However, the share of minorities in public service is rather low, which also reflects the current situation in Estonia.

There is a considerable difference in the age structure of the target groups also indicated in our research. Half of the MPs (57%) make up the age group over 50 years of age, whereas the majority of government officials (79.6%) are below 40 years of age with the highest percentage (over 60%) belonging to the age group of 20-29 years.

The younger group among respondents who made up the sample of the government officials looks somewhat over-represented. However, in the broader context the big share of the younger generation (up to 29 years of age) is explained by the dynamic of administration building in the post-communist Estonia. The substantial differences in the age/generation structure between the groups of MPs and government officials mean that it must be considered as a significant determinant, which could make an impact on the perception of political issues.

The MPs represent mainly the generation who grew up in Soviet era, while the governmental officials dealing with citizenship issues belong to the group that has received its training in a post-communist Estonia and sometimes abroad. The formative impact of the surrounding environment on shaping basic value structures of individuals as they mature has been one of the basic findings of World Value Survey. Its role has been observed also in Estonia.

The respondent group of local authority officials is also composed of younger people (ca 35% belongs to the 20-29 age group). The youngest are the NGO leaders (20-29 age group makes up 54% of representatives). This is explained by the fact that the use of part-time employment is a constitutive element of NGO activities and those among the younger generations are better adapted to this new political environment.

The level of education of all status group samples is high. Less than one-third of the total amount (26,7 %) of the people involved didn't have a university degree. The group with the lowest educational level are the NGO leaders. This is explained by the fact that the necessary prerequisite for obtaining a position was not so much the experience and qualification than belonging to the post-Soviet generation and being trained as modern civil servant (English language competence, some training abroad, etc.) are discriminators with decisive importance. The relative youth of the group also indicates that part of the NGO leaders may still be studying at an undergraduate level.

The data collected was analysed using both quantitative and open-ended questions. The analysis of the open questions of the questionnaires was used as a source of additional information about the attitudes of the respondents. The statements of the respondents were sampled as political, moral, legal and instrumental statements. The proposals and issues raised by the respondents during the interviews and in the answers to the open-ended questions reflect that the absolute majority of respondents (this also concerns members of the polity) are neither well informed about the issues and perspectives of the EU and EU citizenship, nor able to calculate the practical effects of different alternatives of citizenship policy on the future of Estonia. The positions of respondents usually seemed to be close to declarative statements, i.e. they contained little argumentation.

Open questions also contributed much to understanding the context of the study and the true value of the 'expertise' of the respondents. Alongside government officials, only a small number of the MPs and local government officials can be treated as some kind of experts. They mainly appeared to be kind of 'observers', representing common sense without the expertise. The NGO leaders and activists might have day-to-day experience with multicultural people. This does not necessarily mean that they have an elaborated position of reflection, since multiple citizenship generally is neither a practical problem nor an issue of debate in the Estonian society.

Attitudes on multiple citizenship

Mapping the general approach

While analysing the results of this survey, it must be considered that there has not been much, if any, public debate on dual citizenship in Estonia. In general, it has been observed that Estonians don't have a well-informed image of the European Union (Past, Vihalemm 2004:196). This means that respondents' visions don't reflect more or less deliberately crystallised positions. When studying the positive and negative stands of the respondents, it must be considered that our respondents represent the more well-situated part of the population, whose position is generally much more positive than the one of the 'losers' of the post-communist transformation. Scholars, who have studied the attitudes of the latter, have come to the conclusion that xenophobia may potentially shape the practical behaviour (Raik 2001:54).

Multiple citizenship is not legally allowed in Estonia, but a conflict between the constitution and the citizenship law makes it in some cases impossible to sanction by the state.¹ However, the prohibition of multiple citizenship constitutes a substantially different public environment for the formation of popular attitudes compared to most of the other DCE states. This must be taken into account in interpreting the results.

¹ Article 3 of citizenship law on avoidance of multiple citizenship states that any person who by birth in addition to Estonian citizenship acquires the citizenship of another state must within three years after attaining the age of 18 years renounce either Estonian citizenship or the citizenship of another state. However, article 5 section 3 states that no person may be deprived of Estonian citizenship acquired by birth. There is no legal mechanism to deprive native multiple citizens of Estonian citizenship.

Some studies from the last decade inform us that dual citizenship was favoured by two thirds of non-Estonians and overwhelmingly by the Russian citizens residing in Estonia or by residents of Estonia without citizenship. A general explanation was that “choice hints a very high degree of insecurity prevailing among non-Estonians, where one appeasing factor should be security with regard to both countries” (Estonia’s Experiment 1997:17), but practical calculations about the benefits of being a dual citizen were not less important (Estonia’s Non-citizens 1997:15).

The main contribution of the DCE project is that the results of this study give the first insight into the mentality and political position of the Estonian authorities and an influential part of the non-governmental sector, which heavily influences public opinion on the issues of multiple, national and EU citizenship.

Table 3. General stand towards dual citizenship

| Dual citizenship... | | | Dual citizenship... | | | | |
|---------------------|---------|---|---------------------|---------|------|---|--------|
| Rank | dualc_x | Mean | Rank | dualc_x | Mean | | |
| 1 | 1 | should be allowed | 1,6988 | 1 | 7 | should not be offered to immigrants from non-EU | 3,7850 |
| 2 | 3 | should be forbidden because holders owe allegiance to another state | 1,7711 | 2 | 1 | should not be allowed | 3,5327 |
| 3 | 5 | if previously held illegally, a person should not be allowed to obtain it legally | 1,8313 | 3 | 2 | is not a positive idea that I consider ought to be encouraged | 3,5140 |
| 4 | 9 | should be offered to children of long term residents | 1,8795 | 4 | 4 | should not be available to all who apply | 3,4766 |
| 5 | 2 | is a positive idea that I consider ought to be encouraged | 2,0843 | 5 | 8 | should not be offered to immigrants needed to join the workforce | 3,4766 |
| 6 | 6 | should be offered to immigrants from non-EU countries | 2,3373 | 6 | 5 | if previously held illegally | 3,3832 |
| 7 | 4 | Should be available to all who apply | 2,4217 | 7 | 6 | should not be offered to immigrants from the EU | 3,3832 |
| 8 | 8 | should be offered to immigrants needed to join to workforce | 2,5422 | 8 | 3 | should not be forbidden because holders owe allegiance to another state | 3,2336 |
| 9 | 7 | should be offered to immigrants from EU countries | 2,7831 | 9 | 9 | should not be offered to children of long term residents | 2,8224 |

The scale for the answers was 1.4, where responses 1 or 2=agree and 3 or 4=disagree.

Source: Estonian DCE survey data, 2004

Dual citizenship is not a value for the Estonian decision makers. Broadly comparing the ‘negative’ and ‘positive’ stands, we can see that the general position towards dual citizenship is overwhelmingly negative. Decision makers in general believe that dual citizenship should not be allowed or should be forbidden and it is not a positive idea at all. Even the most positive attitudes as expressed in respect to allowing dual citizenship to immigrants from EU countries do not encourage it much.

The general attitude of the Estonian decision makers concerning multiple and EU citizenship tends to be conservative. It is mostly in accord with the logic of building a modern nation-state. Multiple and supranational citizenships are not regarded as positive ideas and are both excluded as alternatives to national citizenship. A nation-state is perceived as the main stronghold of the national community.

Knowledge of the official language of the country of residence seems to be the clearest requirement for multiple citizens, indicating the importance of national and republican conceptions. Recent studies indicate that the quite conservative or even very conservative general attitudes of Estonians on citizenship requirements in terms of naturalization have remained the same. (Nimmerfeldt 2008).

At the same time, the decision makers tended to be unable to calculate the practical effects of the different alternatives of the citizenship policy on the future of Estonia. Much of the discussion remained at a very general level, with little separation between citizenship and nationality on one hand and purely instrumental positions concerning everyday issues on the other. In accordance with the influence of the *ius sanguinis* principle, the rights and duties of multiple citizens are expected mainly to be turned into practice in the country of origin as contrasted with the country of residence. In terms of socio-economic citizenship, the country of residence is ranked higher.

Estonian decision makers are the most negative towards people who have held dual citizenship illegally as well as towards giving dual citizenship to people from non-EU countries. However, the weight of the argument that people with dual citizenship owe allegiance to another state is also very important. Answers to the open questions confirm that the respondents, first and foremost, kept in mind those imagined to owe allegiance to Russia. A pragmatic argument about the 'workforce' has some weight, but it doesn't change the general position. There is a somewhat more shared understanding that the children of the long-term residents should have some privileges in obtaining citizenship. This is also in accordance with the Estonian legislation that has supplied such a right to the children of permanent residents without citizenship.

Observations that are based on this part of the survey are supported with the results from another sample of questions asked about the future of citizenship. Estonian decision makers prefer to maintain national citizenship.

Table 4. Responses on evaluation of national, transnational and dual citizenship

| | Agree | Disagree |
|---|-------|----------|
| National citizenship should be replaced by European citizenship | 13,6 | 86,4 |
| National and dual citizenship are unnecessary when a European citizenship exists | 25,1 | 74,9 |
| Even if full European citizenship existed, it could not replace dual or national citizenship, because they are important for the organisation of the political system | 73,3 | 26,7 |

Source: Estonian DCE survey data, 2004

The formulation of questions that were asked about the preferences/positioning of Estonian nationality in respect to European Union and/or dual citizenship doesn't make it possible to separately compare and analyse support towards a supranational type (EU citizenship) and transnational type of citizenship (multiple citizenship). Nor does it allow clarification on which kind of belonging was the main priority for the Estonian decision makers and which form was not a real alternative to the national one (EU citizenship and dual citizenship were not asked as alternatives and EUC and DC were contrasted to the national one in the same question). The argument about the significance of national citizenship for the organization of the national political system informs us that the national-political aspect of citizenship is the dominant one (the statement about the integrative value of the EU citizenship was not formulated as an alternative).

Along with the overwhelming support for maintaining the national citizenship, Estonian respondents favour citizenship education full heartedly. Only 10.9 percent of respondents stated that citizenship education is not needed. 95.5 percent supported the idea that citizenship education should be provided in schools and 74 percent expressed the opinion that dual citizens need more education for active citizenship than other citizens. Citizenship as an institution is highly valued and dual citizens make a case for special attention in this respect.

Costs and benefits

Dual citizenship can also be discussed in terms of costs and benefits. A balance of calculating costs and benefits in perspective of the development of the Estonian society is leaning very clearly towards the aspect of the 'costs' – scores related to negative expectations/stands are higher. Security risks are unexpectedly not perceived as very high and did not rank high on the list. This doesn't fit with some popular arguments on awarding citizenship to permanent residents without citizenship. This may indicate that Estonians perceive the international status of the state to be more stable after the accession to the EU.

Estonians perceive dual citizenship as risky business first of all in the area of economy and culture. They don't believe that this status contributes to economic development and are afraid that citizens who hold dual citizenship will become a burden to the economy. Hoping that dual citizenship will enrich national culture is outweighed by the fear that it will damage national culture instead. So despite the shared vision that all cultures, religions, etc., are equal (as observed below) a large part of the Estonian decision makers remain strongly nationalist when it comes to culture and hold a conservative and defensive stand.

Table 5. Dual citizenship in a perspective of contribution to national independence and possible risks

| Dual citizens as a resource for the Estonian society | Dual citizens as a threat for the Estonian society |
|---|--|
| 1. Dual citizenship holders contribute to economic diversification and prosperity 2,43 | 1. Dual citizenship is risky for the countries because a person with dual citizenship may act in a way that undermines national security 2,56 |
| 2. Dual citizenship holders enrich the cultural resources of the country 2,60 | 2. Dual citizenship holders damage the native culture 2,85 |
| 3. Dual citizenship enhances the ability of society to deal with social problems 2,78 | 3. Dual citizenship constitutes a burden on the economy 3,10 |
| 4. Dual citizenship enriches the socio-cultural fabric of the nation 2,83 | |

The scale for the answers was 1-4, where responses 1and 2=agree and 3 and 4=disagree

Source: Estonian DCE survey data, 2004

The decision makers were not able to calculate the practical effects of the different alternatives of citizenship policy on the future of Estonia. While multiple citizenship is perceived as a threat to national security in general, the respondents agree that multiple citizens should generally enjoy the same rights and duties as other citizens. It is doubted multiple citizens could facilitate social cohesion, contribute to the economic development of the country, or enrich the socio-cultural fabric of nation. At the same time, a majority of the respondents do not agree that multiple citizens damage the national culture. Here it must be underlined that the dominant attitude is defensive and not hostile. There are no visible signs of principal idiosyncrasy towards contacts with other nations, which can be perceived as the principal problem for EU integration.

Variations of the respondent groups

Throughout the questionnaire we found that the top national decision-makers were the most conservative group. The members of parliament (MPs) constitute a particularly conservative and somewhat more welfare chauvinist category. On the other hand, the leaders of NGOs and the category 'others' seem to be more liberal. The officials are between the MPs and NGO leaders government officials, generally more conservative than local officials.

There may be many variables explaining the relative conservatism of top decision makers. This is at least partly related to the recruitment of the political elite during the period of regaining and securing independence. More firm explanations need more inquiries into problems not covered by the current study.

Table 6. Responses to the statement: Dual citizenship is a positive idea that I consider should be encouraged, 2004 (subcategories and total, percentages)

| | Strongly agree | Agree | Disagree | Strongly disagree |
|----------------------|----------------|-------|----------|-------------------|
| Parliament members | 9,7 | 9,7 | 35,5 | 45,2 |
| Government officials | 6,1 | 26,5 | 32,7 | 34,7 |
| Local officials | 5,3 | 38,6 | 24,6 | 31,6 |
| Leaders of NGOs | 25,9 | 33,3 | 7,4 | 33,3 |
| Others | 10,3 | 27,6 | 24,1 | 37,9 |
| Total | 9,8 | 28,5 | 25,9 | 35,8 |

Source: Estonian DCE survey data, 2004

The content of citizenship

Civil and political citizenship

In general, the attitudes of Estonian decision makers reflect an overwhelming influence of the *ius sanguinis* principle, a strong conception of the nation-state and a strong influence of the current legislation on attitudes (legalism). The rights and duties are mostly linked to the country of origin and there are much more hesitations in linking them to the country of residence.

This is clearly reflected in the attitudes concerning political rights and duties (cf. table below). The patterns are relatively similar in all subcategories, while the variations between subcategories reflect the general trends, with MPs being the most conservative and NGO leaders more liberal. Thus, the selected data is presented by totals.

Table 7. Attitudes of Estonian decision makers on the political rights and duties of dual citizens (total percentages)

| | In the country of origin | | In the country of residence | |
|---|--------------------------|------|-----------------------------|------|
| | Yes | No | Yes | No |
| Holders of dual citizenship should be allowed to vote in national elections | 71,4 | 28,6 | 53,8 | 46,2 |
| Holders of dual citizenship should be allowed to vote in local elections | 55,1 | 44,9 | 77,0 | 23,0 |
| Their citizenship should be revoked if they move permanently to another country | 26,4 | 73,6 | 58,6 | 41,4 |
| Their citizenship should be revoked if they commit a serious criminal act | 22,0 | 78,0 | 70,2 | 29,8 |

Source: Estonian DCE survey data, 2004

The attitudes on electoral rights reflect that the practical setting of legal regulation may influence the positions of decision makers. The respondents supported the voting of dual citizens in their country of residence in local elections, but in the country of origin in national parliament elections – a situation that is totally in accordance with Estonian legislation.

Similar conservatism can also be found when comparing the general attitudes on dual citizenship of Estonian decision makers to the ones of the other DCE countries. However, it should be mentioned that while dual citizenship is prohibited in Estonia, it is legal in most of the other countries and this no doubt has an influence on the attitudes of the respondents (cf. difference between local elections and national elections in table 4²).

Social citizenship

One of our topics of interest was the situation concerning the dimensions of citizenship in the Marshallian sense, especially that of social citizenship. In practical terms, the status of denizens in Estonia is very close to the one of full citizens in the fields of civil and social citizenship. This is well reflected by the factual indifference among a significant part of the non-citizen permanent residents towards obtaining Estonian (or any other) citizenship. If you aren't interested in politics, there is almost no practical difference between the statuses of a citizen and a denizen. Hence – why make the effort to pass the citizenship exams?

Our interest is focused here on the possible effects of the minimal state policy and an underdeveloped public discourse in the field built on the basis of social aid and not on social citizenship. The general model of state-citizens relations has also shaped dominant views about the rights and duties of dual citizens. Are there any differences compared to the more elaborated sphere of political citizenship?

Studying the attitudes on social rights and duties, we can see some vagueness in the attitudes (cf. table below). The influence of the minimal state idea seems to be heavier among top politicians, while NGOs and others show more solidarity. The influence of the *ius sanguinis* approach decreases, but it still exists. In the sphere of social citizenship, legalism partly acts contrary to *ius sanguinis*; this may partly explain the variance.

Table 8. The attitudes of Estonian decision makers towards the social and economic rights and duties of dual citizens (total percentages)

| | In the country of origin | | In the country of residence | |
|---|--------------------------|------|-----------------------------|------|
| | Yes | No | Yes | No |
| <i>Dual citizenship holders:</i> | | | | |
| should pay taxes as any other citizens | 46,2 | 53,8 | 96,9 | 3,1 |
| have obligatory military service as any other citizen | 58,8 | 41,2 | 65,0 | 35,0 |
| have rights to health care as any other citizen | 69,4 | 30,6 | 94,7 | 5,3 |
| have rights to public social benefits as any other citizen | 68,4 | 31,6 | 87,9 | 12,1 |
| have rights to free and compulsory education as any other citizen | 82,8 | 17,2 | 87,4 | 12,6 |

Source: Estonian DCE survey data, 2004

The decision makers generally acknowledge the rights of multiple citizens to medical care and social protection. This is not too surprising if the limited scope of the Estonian welfare system is taken into account. However, there seems to be conceptual confusion on which titular state should a dual

² In Estonia, the permanently residing non-citizens are allowed to vote in local elections but not in national elections.

citizen meet his/her duties in and where should they use the corresponding benefits, with most respondents expecting dual contributions and benefits. Nevertheless, the country of residence is ranked higher. This tells us about an ongoing process in interpreting the field of social citizenship, which could possibly lead to a more liberal (social) concept in the future.

Attitudes towards EU citizenship and general cultural attitudes

The EU accession process has been, in general, qualified first of all as an elite project (Raik 2004:217). However, along with the larger historical context, the pre-accession debates contribute to understanding the main results of our study (unfortunately the basically instrumental type of questionnaire did not include questions that could 'enlighten' us on the wider context).

The role of the discursive integration of Estonia into the EU should not be underestimated. The fact that citizenship as a modern democratic institution belongs to these particular institutions in post-communist Estonia is to a quite considerable extent a result of the transfer from the West (especially the application of the *ius soli* principle for stateless minors). However, the dominant nationalist and ultra-liberal discourse has hindered the rooting of citizenship as a modern institution. Citizenship seems to belong to these cases where the democratic institutions are still in flux because of the transition process, which enhances the constitutive effect of integration into the EU (Raik 2002:138-157). EU integration adds a new dimension to this fundamental identity and security issue.

Further studies on citizenship should be mindful of the fact that Estonia was singled out as a case where security had a higher priority in pre-accession debate than the anticipated economic benefits (Kuus 2002:92). By today, the post-colonial Estonian citizenry at the turn of the millennium got divided into 'losers' and 'winners'. The 'Two Estonias' have emerged – a poor and a (egregiously) rich Estonia. In the context of the demolishing of social citizenship, the 'utilitarian' type of argumentation for supporting EU accession has gained weight (Vetik 2004).

According to popular expectations, in a long-term perspective the EU is expected to dispute the domestic strategy of coping with transitions and produce substantial arguments against the ultraliberal model of Estonian economic policy and building of minimal state (involvement?). It seems that Delanty was correct when he argued, "unless the European Union can reproduce the welfare state on a supranational level there is little point in making plans for a meaningful kind of EU citizenship" (Delanty 1997:293). Estonians have more and more realized that welfare rights could belong to the EU citizen status, offering material benefits as well as the chance to become someone or something else through education, shelter, health care and so on. This has brought along both supportive and rejecting attitudes, especially among the decision makers.

A comparison of the results of the Eurobarometer and the findings from sociological studies provided in Estonia demonstrates that the approaches of citizens of 'old Europe' and the citizens of applicant countries remained very different in terms of the fundamental expectations related to the EU integration and EU citizenship.

Very clearly the dominant fears among the citizens of EU countries at the turn of millennium (such as the transfer of jobs to the low-cost countries, the increase of drug traffic and organized crime, the loss of social benefits, etc. (Amin 2004:7)) have had little significance in Estonia, where the dominant fears are the loss of language, national identity, etc. The 'old EU' citizens give priority to guaranteeing of the rights of the individual and respect for the principles of democracy in Europe (Olsen 2003:93).

This is also supported by our data. The data shows a strong will to maintain national sovereignty, especially among the political and administrative elite. Naturally, this sets limits to agreement with possible deeper supranational developments. This is understandable because Estonia is a small state that has only recently become free of foreign occupation.

The issues raised by decision makers in the open-ended questions reflect that an absolute majority of the respondents is not informed about EU perspectives. Even some of the decision makers didn't know that EU citizenship existed. There was very little knowledge on EU citizenship rights. Thus, EU citizenship is in general treated as a vague concept describing the EU as an institution.

Table 9. Responses to the statement: National citizenship should be replaced by an EU citizenship, 2004 (subcategories and total, percentages)

| | Strongly agree | Agree | Disagree | Strongly disagree |
|----------------------|----------------|-------|----------|-------------------|
| Parliament members | 0,0 | 3,2 | 19,4 | 77,4 |
| Government officials | 6,0 | 10,0 | 26,0 | 58,0 |
| Local officials | 5,1 | 6,8 | 23,7 | 64,4 |
| Leaders of NGOs | 18,5 | 3,7 | 18,5 | 59,3 |
| Others | 7 | 14,3 | 32,1 | 46,4 |
| Total | 6,7 | 7,7 | 24,1 | 61,5 |

Source: Estonian DCE survey data, 2004

On the basis of complementary open-ended questions, it is possible to conclude that despite the fragility of the ‘European order’, the existing degree and intensity of the European integration is seen mainly as a sufficient one by the respondents in Estonia. The decision makers prefer the integrated Europe to be a safe framework that isn’t too tight and where strong positions of nations are retained.

EU citizenship is welcomed in its current form by the decision makers, but it is not considered to be appropriate for it to replace national citizenships. The attitudes concerning European citizenship are related to patriotism and interest in preserving national culture. EU citizenship is continuously seen as a complementary citizenship.

Quite understandably in this context, the idea that EU citizenship could eventually replace national citizenships would be unpopular. In such a case, the national citizenship would become a residual and subordinate form of membership similar to the regional citizenships that exist in the federal states. This would mean that the EU developed towards a true federation and this perspective is not too popular among Estonian decision makers.

Future development towards a more consolidated (federation-like) EU has its supporters and critics in Estonia. Transferring significant political content to EU citizenship (as well as supplying the EU institutions with legislative power) is generally perceived as a danger to national sovereignty. The resistance to some modest kind of western federalism may be smaller if the regulation had features assuring that it would be possible to maintain the Estonian culture and identity.

At the same time, Estonians generally respect other nations and national cultures. (This was evident via the country specific part of our questionnaire.) Scepticism towards more supranational structures doesn’t speak of chauvinism, but reflects protective attitudes instead. This understanding is supported by the material displayed below. The same groups that are the most concerned about the disappearing of national citizenship (as MPs) are of the mindset that cultures are equal (answers on religions and languages show similar positions).

Table 10. Responses to the statement: *Even if full European citizenship existed, it could not replace the dual or national citizenship, because they are important for the organisation of the political system*, 2004 (subcategories and total, percentages)

| | Strongly agree | Agree | Disagree | Strongly disagree |
|----------------------|----------------|-------|----------|-------------------|
| Parliament members | 80,6 | 19,4 | 0,0 | 0,0 |
| Government officials | 52,0 | 26,0 | 16,0 | 6,0 |
| Local officials | 60,3 | 24,1 | 12,1 | 3,4 |
| Leaders of NGOs | 44,4 | 33,3 | 11,1 | 11,1 |
| Others | 60,7 | 17,9 | 17,9 | 3,6 |
| Total | 59,3 | 24,2 | 11,9 | 4,6 |

Source: Estonian DCE survey data, 2004

Without a big leap in popular consciousness, prioritising freedoms and individual perspectives of success, liberal values, which remains unlikely in the near future, fears and resistance continue to dominate the reaction to perceived erosion of boundaries and threatened identities.

European comparison

The DCE project revealed that Estonians have some specific concerns related to multiple citizenship that are different from those of older EU members. Compared to the rest of Europe, Estonia is quite conservative. Attitudes on multiple citizenship appeared to be generally positive in most DCE countries, while Estonia and Israel showed negative attitudes. Respondents in Estonia and Israel were also the only ones regarding multiple citizenship as a loyalty problem.

On one hand, Estonia and Israel are the youngest nation-states among the DCE countries and their connection to the EU is a fresh membership in the case of Estonia and no membership in the case of Israel. At the same time, Estonia is the only state fully prohibiting multiple citizenship in legislation and attitudes towards the subject tend to be influenced by the content of laws.

In line with the other DCE EU member states and in contrast with Israel, considerable agreement prevails among the participants of the study as to multiple citizens having the same rights and duties as other citizens. Thus, the attitudes concerning the legal position of persons can be seen as remaining on a firmly legal basis in Estonia.

Table 11. DC should be allowed (A); DC should entail the same rights and duties as native citizenship (B); and DC can pose a loyalty problem (C).

| | (A) Agree % | (A) Disagree % | (B) Agree % | (B) Disagree % | (C) Agree % | (C) Disagree % |
|------------------|----------------|-------------------|----------------|-------------------|----------------|-------------------|
| Estonia | 43.0 | 57.0 | 69.1 | 30.8 | 51.2 | 48.8 |
| Finland | 93.7 | 6.3 | 91.5 | 8.5 | 5.4 | 94.5 |
| France | 85.4 | 14.6 | 94.0 | 6.0 | 20.4 | 79.6 |
| Germany | 78.1 | 21.8 | 95.8 | 4.2 | 17.1 | 83.0 |
| Greece | 85.5 | 14.5 | 94.0 | 6.0 | 15.4 | 84.6 |
| Israel | 19.9 | 80.2 | 18.4 | 81.7 | 84.9 | 15.1 |
| Portugal | 89.8 | 10.2 | 91.8 | 8.1 | 1.1 | 98.9 |
| UK | 95.4 | 4.6 | 92.2 | 7.8 | 6.4 | 93.6 |
| EU/CoE Officials | 90.9 | 9.0 | 95.6 | 4.3 | 8.7 | 91.3 |
| Total | 74.7 | 22.7 | 83.6 | 12.9 | 19.9 | 75.7 |

Source: Toropainen *et al* 2008, modified

Compared to the other DCE countries, the Estonian decision makers hold relatively mainstream positions with regard to European citizenship. European citizenship is regarded as a positive tool for co-operation but more in terms of complementing rather than substituting the national political community.

On the basis of the supplementary open-ended questions, it is possible to conclude that it seems that despite the fragility and unequal character of the 'European order', the existing degree and intensity of European integration is mainly sufficient according to the respondents in both Estonia and other DCE countries, and they do not even want the community to be too tight. They want an integrated Europe to create a safe framework, where national cultures are well alive and respected. People want to preserve EU citizenship primarily as a complementary citizenship that does not force people into excessive uniformity.

Table 12. EC makes national citizenship unnecessary (A) and EC strengthens the allegiance of European nations (B).

| | (A) Agree % | (A) Disagree % | (B) Agree % | (B) Disagree % |
|------------------|-------------|----------------|-------------|----------------|
| Estonia | 25.1 | 74.9 | 59.8 | 40.2 |
| Finland | 8.9 | 91.1 | 63.8 | 36.2 |
| France | 35.9 | 64.0 | 92.3 | 7.8 |
| Germany | 25.5 | 74.6 | 84.6 | 15.3 |
| Greece | 21.4 | 78.6 | 78.6 | 21.3 |
| Israel | 82.6 | 17.4 | 19.6 | 80.4 |
| Portugal | 24.4 | 75.6 | 88.3 | 11.7 |
| UK | 26.9 | 73.0 | 63.5 | 36.5 |
| EU/CoE Officials | 13.6 | 86.4 | 85.7 | 14.3 |
| Total | 21.5 | 71.5 | 68.7 | 22.4 |

Source: Toropainen *et al* 2008, modified

Discussion

The general attitude of the Estonian decision makers understandably tends to be conservative. It is mostly in accord with the building of a nationalising modern state. Very broadly, the necessity to treat dual citizens as citizens is understood – at least in one of their titular nationality countries. However, the rights and duties of multiple citizens are, as a rule, expected to be effectively realised in the country of origin instead of the country of residence. The influence of the historical *ius sanguinis* principle is clearly pushed to the background here.

There are some objective risk factors that define the defensive attitude towards dual citizenship.

1. Estonia is one of the tiniest states – a big number of dual citizens can be a challenge to its political stability.
2. Estonia is a relatively poor country that exercises minimal state policy. Immigrants are perceived as a challenge to the economy.
3. Geopolitical and security factors play an important role. Dual citizens can build a well-organized community, which hardly identifies itself with Estonia.

Estonian respondents in general are quite conservative with respect to dual citizenship and supranational memberships. DC is seen as something that should not be allowed and not perceived as a positive idea. The nation-state is perceived as the main stronghold of the national community. The position of decision makers on promoting multiple citizenship is determined by the strong concept of a nation-state and specific problems related to the post-colonial residents.

However, there are differences between general positions and attitudes on more practical situations. While multiple citizenship is perceived as a threat to national security in general, the respondents agree that multiple citizens should generally enjoy the same rights and duties as other citizens. For example, a majority of the respondents do not agree that multiple citizens damage the national culture. The attitudes on electoral rights reflect that the practical setting of legal regulations may influence the positions of decision makers.

The Estonian decision makers are more eager to bestow multiple citizens with rights than demand the fulfilment of obligations. This is especially evident in the sphere of economic and social citizenship and in the case of the country of origin. This is a sign of the strength of the liberal understanding of citizenship. This finding is not surprising if the historical and legal tradition is taken into account.

In terms of economic citizenship, loyalty to the country of residence is ranked higher. This ranking may be interpreted as an impact of economic globalisation. Differences between more general positions and answers pertaining to practical questions of daily life obviously refer to the incongruence between normative perceptions and practical experiences.

The top national decision makers form a group where the majority favours a mixture of a republican and communitarian understanding of citizenship. The members of parliament (MPs) constitute a

particularly conservative and somewhat more welfare chauvinist category. On the other hand, the representatives (leaders) of NGOs and those who fall in the category 'others' seem to be more liberal. The officials are between the MPs and NGO leaders, with government officials being generally more conservative than local officials. The dominant factor here is a relatively young age of all groups alongside that of the MP-s. But even the NGO leaders have a relatively conservative stand, despite belonging to the younger age group.

The age factor reveals that a big share of decision makers have been educated in the Soviet era, where they didn't have any exposure to a more contemporary conceptualisation of citizenship, comparable even to the relatively modest courses of civics in the Estonia of nowadays.

With respect to social citizenship, the attitudes are more vague. The decision makers generally acknowledge the rights of multiple citizens to medical care and social protection. This is not too surprising if the limited scope of the Estonian welfare system is taken into account. In which titular state should a dual citizen meet his/her duties and use the corresponding benefits and should there be any correspondence at all is a topic that seems to require additional investigation. Education, for example, is highly valued and allowed to be provided in any case. This tells us about an ongoing process in interpreting the field of social citizenship that could possibly lead to a more open approach in the future.

The majority of the respondents tend to deny or limit the political rights of the holders of dual citizenship in the country of origin, but also in the country of residence. This may be a sign of a strong communitarian approach as reflected by the interest of national survival. However, a possible explanation may also be the strength of republican attitudes in defining the relations between the state and its citizens. Citizenship is perceived as an institution of fundamental value. The strong concept of a nation-state is negative towards any kind of multiple citizenship. Citizenship is interpreted as a relationship of trust and loyalty and it is argued that one cannot be loyal to two states at the same time.

Conclusions

Generalising on the above discussion, we can bring out the underlying mental factors that should be considered as broadly explaining the attitudes of respondents.

1. Historical legal tradition – the national concept of citizenship is closely related to the concept of a cultural nation.
2. The background of dual citizenship practices in Estonia is a challenge related to the post-colonial status and a great number of Russian citizens, whose demands (supported also in international context by Russia) have included legalising dual citizenship.
3. A long isolation of the country from the developments of modern citizenship as an institution, limited practices in treating legal immigrants and parochial elements in habits.

In Estonia's case, we can distinguish three main periods in the re-conceptualising of citizenship as an institution. The first period or the years 1988-1995 can be interpreted as one of reconstituting nationality, while the second period of 1995-2001 dealt with the consolidation of nationality as citizenship. For us, the key interest is in the third period that started from 2001 with the launching of the pre-accession period to the EU.

After accession, coming to terms with the past in the context of shaping the EU citizenship got new dimensions. Today the developing of a new supranational republican citizenship and the institutionalising of liberal citizenship with the corresponding collective rights is at stake. The context of these challenges defines the positions of Estonians towards EU integration and citizenship.

The decision makers welcome EU citizenship in its current thin form, but it is not considered to be appropriate for it to replace national citizenships. The attitudes concerning European citizenship are related to patriotism and interest in preserving national culture. Multiple citizens generally expressed the same topics in the interviews with supplementary emphasis on the freedom of movement.

Quite understandably in this context, the idea that EU citizenship could eventually replace national citizenships would be unpopular. In such a case, national citizenship would become a residual and subordinate form of membership similar to the regional citizenships that exist in the federal states.

This would mean that the EU developed towards a true federation and this perspective is not too popular among Estonian decision makers and even many multiple citizens.

The issues raised by respondents reflect that an absolute majority of the respondents are not informed about European Union perspectives or able to calculate the practical effects of different alternatives of citizenship policy on the future of Estonia. Dual citizenship and EU citizenship both are excluded as alternatives to national citizenship. Even immigrants from EU countries as potential holders of dual citizenship are not tolerated as an exception.

Transferring significant political content to EU citizenship (as well as supplying the EU institutions with legislative power) is generally perceived as a danger to national sovereignty. The responses to the open-ended questions also show that the EU is expected to maintain its nature as a liberal (i.e. market based) 'community' and not to be developed towards a (unitary or federal) state. A popular slogan of EU-critics 'From one Union [i.e. from the USSR] to another Union [i.e. European Union]' has obvious relevance in the mind of the populace. Resistance to a modest kind of western federalism may be smaller if the regulation had features assuring the state that it is possible to maintain the Estonian culture and identity.

The main concern of the Estonian decision makers looks to be, first of all, maintaining control over their destiny as a nation. Their position that, in general, tends to deny the revoking of citizenship is in line with Estonian legislation that in principle denies revoking the citizenship of those who are citizens by birth. This is one of the signs of legalism, i.e. the accordance of the content of legal regulation and the attitudes seen in connection to electoral rights.

We see a curious set of attitudes: the general description of respondents may be 'nationally minded liberals' influenced by the needs of nation building, but simultaneously by the relatively open legal tradition and instrumentalist positions concerning everyday legal issues. This means that some effort is required for Estonia to adapt to the context of the participatory and social 'Citizens' Europe' as put forward by many in the traditional core of the EU.

However, there are clear avenues for progress as there are some intrinsic tensions in the attitudes of Estonian decision makers and many of their positions are not incongruent to the ones in the other EU states. As the Estonians show a firm appreciation for learning and education, a positive development is possible. Even though Estonia mostly accommodates to the European mainstream, the local context should be taken into account. In order to achieve lasting results, learning and adaptation must happen on both sides.

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