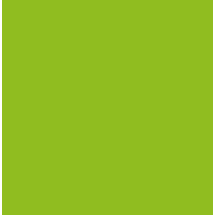




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COMPARATIVE
REPORT

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2018

COMPARATIVE REPORT: CITIZENSHIP IN CENTRAL ASIA



AUTHORED BY

MEDET TIULEGENOV



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Comparative Report

Citizenship in Central Asia

Medet Tiulegenov

1. Introduction

The report analyzes citizenship laws in 5 post-Soviet Central Asian countries - Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan, all of which gained independence after the breakup of the Soviet Union in 1991. The first section provides an analysis of legal provisions and it is structured along the three key aspects – acquisition of citizenship at birth, acquisition of citizenship after birth and loss of citizenship and also in some cases compares citizenship policies with the rest of post-Soviet space (with addition of Mongolia and without covering Baltic countries). The third section analyzes aspects of ethnicity and migration in acquisition of citizenship acquisition in Central Asia.

2. Comparative analysis of citizenship laws

After the breakup of the USSR the Central Asian countries, as other successor states, had to develop their own citizenship policies. Unlike some other post-soviet states, countries in the region were less concerned about issues of immigration and ethnic demographics. Also being newly created, rather than restored states, they constituted their citizenries inclusively on a territorial basis (Brubaker 1992). In the early 1990s the Central Asian states thus ascribed citizenship in territorial terms to those who resided there at independence, although the later replenishment of the citizenry was more based on descent.

2.1. Acquisition of citizenship at birth

Generally, citizenship is acquired due to a birth in a territory (*ius soli*) or due to birth to citizen parents (*ius sanguinis*). The automatic application of the *ius sanguinis* principle is spread worldwide, and countries of Central Asia are no exceptions in this.

2.1.1 *Ius sanguinis*

In Central Asian countries *ius sanguinis* is applied automatically and in some countries, such as Kyrgyzstan (see Table 1), there are stipulations of acquiring consent from a foreign parent.

Table 1. Rules of *ius sanguinis*

	Child born in the country		Child born outside of the country	
	General rule	Special cases	General rule	Special cases
Kazakhstan	Automatic	-	Automatic	If one parent is stateless or of unknown citizenship
Kyrgyzstan	Automatic	Consent of a foreign parent	Automatic	Consent of a foreign parent
Tajikistan	Automatic	-	Automatic	Consent of a foreigner parent (automatic if the parents fail to agree within 3 months from the child's birth and the child remains stateless).
Turkmenistan	Automatic	-	Automatic	Consent of a foreign parent, if there was no residence (unless the child does not acquire another citizenship).
Uzbekistan	Automatic	-	Automatic	Consent of a foreign parent, if no residency

Data source: GLOBALCIT (2017)

Kazakhstan's provisions on automatic acquisition applies in cases when parents are abroad or if one parent is stateless or of unknown citizenship. In Tajikistan and Turkmenistan joint written consent is required. The same rule exists in Uzbekistan.

2.1.2 *Ius soli*

Among Central Asian countries Kyrgyzstan offers a possibility to acquire citizenship if a child is born on its territory provided that there is a consent from a foreign parent (the same provision also exists in another post-Soviet country, Armenia). Other countries of the region do not have general rules of *ius soli*.

2.1.3 Special rules of acquisition of citizenship at birth

Special rules concern children born to stateless parents or to parents of unknown origins and children who are found in the country. There are 230 million stateless children in the world that are not registered (Lois, 2017) and in Kyrgyzstan alone a survey done in 2007-2008 identified more than 6,000 children of stateless persons who had difficulties to obtain passports (UNHCR, 2011). In Central Asia if a child is born to stateless parents in most of the cases special *ius soli* rules apply to a child born to parents who are both without citizenship and are permanently residing in the country – or, as in Tajikistan, at least one parent resides permanently in the country.

Acquisition of citizenship at birth for stateless children or for foundlings is automatic for all countries in the region (see Table 2).

Table 2. Special rules of acquisition of citizenship at birth

	Stateless at birth	Foundlings
Kazakhstan	Automatic	Automatic
Kyrgyzstan	Automatic	Automatic
Tajikistan	Automatic	Automatic
Turkmenistan	Automatic	Automatic
Uzbekistan	Automatic	Automatic

Data source: GLOBALCIT (2017)

2.2. Acquisition of citizenship after birth

Unlike in the case of acquisition of citizenship at birth, acquiring citizenship after birth is more burdensome and entails various requirements. There are generally two ways of acquiring citizenship after birth – ordinary naturalisation and special naturalisation. The former is based mostly on grounds of a minimum period of residence in the country, language, etc., whereas the latter takes into account various other considerations – co-ethnics, refugees, special contributions made to the country and other factors.

2.2.1. Rules of ordinary naturalisation

Status of residence is one of the major factors considered in the rules of ordinary naturalisation. Conditions other than residence include language proficiency, renunciation of other citizenship, family relations, good character of an applicant, knowledge about the country, etc.

All countries of the region require at least 5 years of residence for ordinary naturalisation (see Table 3) as well as proof of good character. In the case of Uzbekistan an applicant should renounce another citizenship, a stipulation which has existed since the country's law was adopted in 1992. Two countries in the region – Kyrgyzstan and Turkmenistan – require proof “of legal sources of sustenance” though without stipulating how these should be demonstrated.

Table 3. Rules of ordinary naturalisation

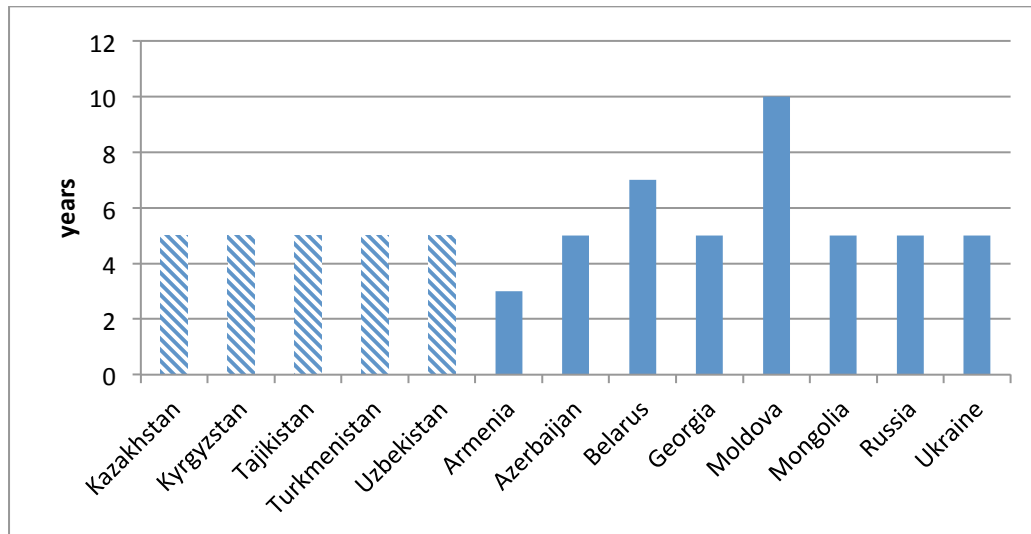
	<i>Residence (years)</i>	<i>Renunciation of other citizenship</i>	<i>Language</i>	<i>Knowledge about country</i>	<i>Good character</i>	<i>Self- sufficiency</i>
Kazakhstan	5	-	-	-	Yes	-
Kyrgyzstan	5	-	Yes	-	Yes	Yes
Tajikistan	5	-	Yes	-	Yes	-
Turkmenistan	5	-	Yes	-	Yes	Yes
Uzbekistan	5	Yes	-	-	Yes	-

Data source: GLOBALCIT (2017)

All Central Asian states require thus five years of residence and this applies also to other post-Soviet states including Mongolia (excluding Baltic states, see Figure 1). Only three countries have other residence requirements – Moldova and Belarus much higher ones, with 10 and 7 years respectively, and Armenia a much shorter one of only 3 years.

Central Asian states do not impose knowledge about countries as a prerequisite for ordinary naturalisation. Some of the countries, such as Kyrgyzstan and Turkmenistan require self-sufficiency though. One country in the region, Uzbekistan, requires renunciation of another citizenship.

Figure 1. Years of residence required for ordinary naturalisation in Central Asia and other post-Soviet countries and Mongolia



Data source: GLOBALCIT (2017)

Good character quite often means absence of criminal record. In Kazakhstan this is specified as not having committed crimes against humanity, illegal activities, no records of instigating interethnic or inter-confessional hatred, and no ongoing criminal penalty. Kyrgyzstan also lists many of these conditions and excludes also those who were temporarily or constantly expelled from a country. In Uzbekistan the list of good character attributes includes non-membership in “parties or other organisations whose activities are incompatible with the constitutional principles”. The five year residence requirement is not applicable in Uzbekistan if an applicant has a proof that she or at least one of her parents or grandparents were born in the country. The residence term is reduced to half in Tajikistan if one of the parents was a citizen of the country at the time of birth. Kyrgyzstan and Turkmenistan stipulate in detail what is considered as uninterrupted residence (if a person did not spend more than three months in a year outside the country).

None of the Central Asian states has requirements about knowledge of the country. Yet some of them introduce language proficiency for ordinary naturalisation. In Kyrgyzstan an applicant should provide a document proving knowledge of either the Kyrgyz or Russian language. This requirement is waived in case of providing a diploma from an educational institution where the language of instruction was either Russian or Kyrgyz. Tajikistan and Turkmenistan require “knowledge of the state language at the communication level”.

2.2.2. *Special naturalisation*

Persons who can access special naturalisation are spouses of citizens, former citizens, co-ethnics and people who have distinct achievements. Two countries in the region, Kazakhstan and Kyrgyzstan, have special procedures for spouses (see Table 4). In Kazakhstan the

residence requirement can be reduced from five to three years if a spouse is a citizen of the country. A target person in Kazakhstan is one who is married to a citizen and has been lawfully and permanently resident for 3 years. In Kyrgyzstan a person considered is a female foreign citizen or stateless person, is married to a citizen, has been resident for 1 year and has arrived in the country with the purpose of having permanent residence.

Table 4. Special naturalisation – spouses of citizens

	<i>Procedure</i>	<i>Residence (years)</i>	<i>Renunciation of other citizenship</i>	<i>Language</i>	<i>Other conditions</i>
Kazakhstan	Discretionary	3	-	-	-
Kyrgyzstan	Registration	1	-	Yes	-
Tajikistan	n/a	-	-	-	-
Turkmenistan	n/a	-	-	-	-
Uzbekistan	n/a	-	-	-	-

Data source: GLOBALCIT (2017)

There are special procedures if a person is a child of someone who acquires citizenship. In Kazakhstan a person is under the age of 14 and his/her parent(s) are acquiring citizenship. If one parent remains a foreigner, the child can acquire citizenship provided that the parents submit a joint written application and provided the child has permanent residence in the country. There is a requirement for the child's consent between 14 and 18 years of age. In other Central Asian countries similar conditions apply and in Kyrgyzstan, if one parent is without citizenship, the child shares in the acquisition of citizenship by the other parent automatically (if the child is resident in the country) or upon the request of the parent acquiring citizenship (if the child is resident abroad).

Many countries have special provisions for citizenship acquisition by former citizens or people who belong to certain ethnic groups. In post-Soviet countries reference to former citizens often implies provisions to those who were born in or were citizens of the USSR. While these conditions frequently mean reference to adjacent countries, proximity may also motivate special restrictions, as it is in case with dual citizenship restriction in Kyrgyzstan to countries with which it shares borders (article 22).

Repatriation programs and related laws have been adopted in some post-Soviet countries; in Central Asia this was the case in Kazakhstan, Kyrgyzstan and Turkmenistan – at least such programs were stipulated in the laws. Repatriates may still experience social exclusion, as was the case with Kazakh repatriates from Mongolia who belong well to their

new homes due to knowledge of language and traditions, but were excluded from society due to lack of knowledge of Russian and an absence of shared Soviet experience (Werner, 2017).

In Kyrgyzstan the residence requirement can be reduced to one year if a person was “born in the Kyrgyz SSR and had citizenship of the former USSR”. In Turkmenistan a similar rule applies to “former Soviet citizens who have a close relative in Turkmenistan and arrive with the aim of permanent residency”.

Table 5. Special naturalisation – former citizens and co-ethnics

	Former citizens/residents of specific states/territories		Co-ethnics	
	<i>Target</i>	<i>Main facilitations</i>	<i>Target</i>	<i>Main facilitations</i>
Kazakhstan	Certain categories of former citizens of USSR	Registration	Ethnic Kazakhs who moved to the country with the aim of permanent residence.	Residence requirement waived
Kyrgyzstan	Certain categories of former citizens of USSR and residence for 1 year.	Naturalisation (discretionary). Registration	Persons of Kyrgyz ethnicity	Residence reduced to one year
Tajikistan	Certain categories of former citizens of USSR and residence for 2.5 years. Person is a veteran of WW II, with citizenship of the former USSR	Naturalisation (discretionary). Restoration	n/a	n/a
Turkmenistan	Former citizens country.	Restoration	Persons of the Turkmen origin or their descendants	Residence requirement maybe shortened
Uzbekistan	Person is a former citizen of USSR.	Restoration	n/a	n/a

Data source: GLOBALCIT (2017)

In Kyrgyzstan residency could be waived altogether for “persons who are ethnic Kyrgyz and have citizenship of a foreign country or are stateless, former citizens of Kyrgyz republic upon returning for permanent residency to the Kyrgyz Republic, as well as foreign citizens and stateless females married to a citizen of Kyrgyzstan and arriving for permanent residency”.

In Turkmenistan the residency limit can be reduced or waived altogether for “Turkmens, and their descendants (children, grandchildren, grand-grandchildren and others)”.

Cultural affinity as a ground for citizenship acquisition exists not only in Central Asia, but also in other parts of the post-Soviet space (see Table 6). While in Central Asia the tendency of application of the rule is mostly associated with the degree of ethnic homogeneity of population, in other parts of the post-Soviet space identity politics could be assumed a factor.

Table 6. Articles in the law related to cultural affinity in Central Asia and other post-Soviet states and Mongolia

	Central Asia					Other states							
	Kazakhstan	Kyrgyzstan	Tajikistan	Turkmenistan	Uzbekistan	Armenia	Azerbaijan	Belarus	Georgia	Moldova	Mongolia	Russia	Ukraine
cultural affinity	yes	yes	no	yes	no	yes	no	yes	no	no	no	yes	yes

Data source: GLOBALCIT (2017)

All Central Asia countries have provisions to acquire citizenship for persons with special achievements (see Table 7). All of them stipulate in various ways grounds which are viewed as special achievements. These can be achievements in certain areas, such as a science, arts or technology and often in professions that are in high demand. Approaches to facilitate citizenship acquisitions vary from country to country. In Tajikistan there are no specific conditions. In case of Kazakhstan residence requirements can be waived and in Turkmenistan they can be shortened. In Kyrgyzstan a shortened residence is specified as for three years. In Uzbekistan, in addition to residence, the need of renunciation of other citizenship and self-sufficiency requirement can be waived.

Table 7. Special naturalisation – persons with special achievements

	Grounds	Main facilitations
Kazakhstan	Outstanding services to the country	Residence requirements can be waived
Kyrgyzstan	High achievements in science or culture or a profession or qualification that is in high demand	3 years residence
Tajikistan	High achievements in science, technology, healthcare or sports, the economic, social and cultural development of the country	No other conditions
Turkmenistan	Outstanding services to Turkmenistan, high achievements in science, technology, culture or sport, or having a profession or qualification of interest to the country	Residence requirements can be shortened
Uzbekistan	Outstanding services or high achievements in science, technology or culture or having a profession or qualification of interest to the country	residence, renunciation of other citizenship and lawful means of subsistence requirements may be waived

Data source: GLOBALCIT (2017)

Accepting refugees and facilitating their citizenship acquisition is a complicated process in Central Asia. Since the 1951 Convention Relating to the Status of Refugees and Protocol (1967) were adopted most countries in the world have signed it. Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan signed Convention in 1999, 1996, 1993, 1998 respectively, and signed the Protocol in 1999, 1996, 1993, 1998 respectively. Uzbekistan is the only country which did not sign either the Convention or the Protocol. The most acute case of the need of accepting refugees in the region was the flight of refugees from Tajikistan due to civil war in this country in 1992-1997. As of 2016, according to UNHCR in Central Asia, there were 130,000 stateless people and 3570 refugees. In the preceding two years 11 thousands stateless people acquired or confirmed their citizenship in four countries of the region.

Most of the countries in the region do not have provisions on special naturalisation of recognized refugees. Kyrgyzstan and Turkmenistan have such procedures and they are discretionary. In case of Kyrgyzstan there are facilitating conditions in regard to residence requirements as well as the provision of certain documents which are normally required.

Table 8. Special naturalisation – recognized refugees

	Procedures	Residence (years)	Other conditions
Kazakhstan	No provision	n/a	n/a
Kyrgyzstan	Naturalisation (discretionary)	3	Yes
Tajikistan	No provision	n/a	n/a
Turkmenistan	Naturalisation (discretionary)	n/a	Yes
Uzbekistan	No provision	n/a	n/a

Data source: GLOBALCIT (2017)

Compared to the post-Soviet Central Asia (see Table 9) almost all other post-Soviet states, except Belarus and Mongolia, have articles in their respective laws on citizenship regarding refugees. Citizenship provisions on stateless people are less frequent in Central Asia as well as in other post-Soviet states. In all of these cases the process of naturalisation is discretionary.

Table 9. Articles in the law related to stateless people and refugees in Central Asia and other post-Soviet states and Mongolia

	Central Asia					Other states							
	Kazakhstan	Kyrgyzstan	Tajikistan	Turkmenistan	Uzbekistan	Armenia	Azerbaijan	Belarus	Georgia	Moldova	Mongolia	Russia	Ukraine
Stateless or unclear citizenship	no	no	yes	no	no	no	yes	no	no	yes	no	yes	yes
Refugees	no	yes	no	yes	no	no	yes	no	yes	yes	no	yes	yes

Data source: GLOBALCIT (2017)

3. Loss of citizenship

Turkmenistan and Uzbekistan do not have specific provisions on voluntary loss of citizenship. Three other countries, Kazakhstan, Kyrgyzstan and Tajikistan consider possession of another citizenship as a condition for voluntary loss of citizenship.

In all three countries which regulate voluntary loss of citizenship a precondition for this is lack of any unfulfilled obligations towards the state, property related obligations towards citizens or organisations in the country or ongoing criminal investigation and unfinished sentencing. Kazakhstan considers “contradiction to national interests” as a condition justifying denial of renunciation of citizenship and Tajikistan besides that includes incomplete military service.

Table 10. Voluntary loss of citizenship

	<i>Possession of another citizenship</i>	<i>Residence abroad</i>	<i>No ongoing charges or convictions</i>	<i>Completed military (or alternative) service</i>	<i>No other obligations towards the state (others)</i>
Kazakhstan	Yes	No provision	No provision	No provision	No provision
Kyrgyzstan	Yes	No provision	No provision	No provision	No provision
Tajikistan	Yes	No provision	No provision	No provision	No provision
Turkmenistan	No provision	No provision	No provision	No provision	No provision
Uzbekistan	No provision	No provision	No provision	No provision	No provision

Data source: GLOBALCIT (2017)

Grounds for involuntary loss of citizenship are quite broad and include a variety of situations – acquisition of another citizenship, residence abroad, service in other states’ armies and engagement in their services, and others. Only Uzbekistan’s law stipulates that a person loses citizenship in case of “permanently living abroad and not having consular registration without good reasons within five years”.

While Turkmenistan and Uzbekistan do not have special provisions on the issue of voluntary acquisition of other citizenship, Kazakhstan, Kyrgyzstan and Tajikistan do have such provisions. Traditional conceptions of citizenship according to which acquisition of another citizenship is viewed as a violation of exclusive political membership dominate policies of many post-communist countries (Herzog, 2012). In Central Asia only one country,

Kyrgyzstan, while having a ground for loss of citizenship in case of voluntary acquisition of another citizenship, yet envisions the possibility of dual citizenship. That provision applies if “there are international agreements on dual citizenship wherein the Kyrgyz Republic takes part” and in fact there have not been such agreements yet. Turkmenistan was the only country in the region which has a dual citizenship agreement with Russia since 1993, but it denounced it in 2002 and applied this rule to a hundreds of thousands of those who had acquired this status before (Shaver, 2003).

Table 11. Involuntary loss of citizenship – grounds of loss

	<i>Residence abroad</i>	<i>Voluntary acquisition of other citizenship</i>	<i>Service in other army/other services</i>	<i>Disloyalty of treason</i>	<i>Fraud in acquisition</i>
Kazakhstan	No provision	Yes	Yes	No provision	Yes
Kyrgyzstan	No provision	Yes/dual citizenship	Yes	No provision	Yes
Tajikistan	No provision	Yes	Yes	No provision	Yes
Turkmenistan	No provision	No provision	Yes	No provision	Yes
Uzbekistan	Yes	No provision	Yes	No provision	Yes

Data source: GLOBALCIT (2017)

The changes in constitution of Kyrgyzstan made at the end of 2016 however stipulate that a person can be deprived of citizenship “in cases and according to a procedure stipulated in a constitutional law” (which has not been proposed yet at the time of writing this report

4. Citizenship, ethnicity and labour migration in Central Asia

Unlike some other post-Soviet states, the countries in Central Asia acquired independence within territorial boundaries which were arbitrarily drawn in the 1920s and 1930s within the Soviet Union and this left a legacy of border disputes, enclaves and exclaves as well as mixed ethnic composition across borders. All of these circumstances had a certain impact on citizenship policies.

Most post-Soviet states were nationalizing states (Brubaker, 2011) that tried to ensure a control of a major ethnic group in regard to official identification of a nation. Multiethnic composition requires specific approaches to identity politics, which include policies towards citizenship. Kazakhstan is the most ethnically heterogeneous country in the region and Tajikistan is relatively more homogeneous. As the most ethnically diverse country, Kazakhstan attempted to overcome this dilemma by developing a supra-ethnic identity asking individuals to set aside their ethnic identities or advancing Kazakh identity as paramount (Rees et al, 2017). As Table 12¹ below shows there is a significant variation among Central Asian countries with regard to the ethnic composition of their population.

Table 12. Ethnic composition in Central Asian countries (%)

Kazakhstan (2016)	Kyrgyzstan (2017)	Uzbekistan (2017)	Tajikistan (2010)
Kazakhs 66,5	Kyrgyz 73,2	Uzbeks 83,8	Tajiks 84,31
Russians 20,6	Uzbeks 14,6	Tajiks 4,8	Uzbeks 12,2
Others 9,8	Russians 5,8	Others 3,5	Others 2,19
Uzbeks 3,1	Others 4,9	Kazakhs 2,5	
		Russians 2,3	
		Karakalpaks 2,2	

Data source: statistical committees of these countries (stat.kg, stat.uz, stat.tj, stat.gov.kz)

Citizenship policies which were aiming to affect the ethnic balance were present in pre-Soviet and also in Soviet times (Lohr, 2012). The demographic trends since the 1990s in all countries in the region were reflected in an increase of a core ethnic majority, mostly due to larger out-migration as well as different fertility rates among some other ethnic groups.

¹ Ethnic groups with at least 2% in population of a country are indicated. The data for Turkmenistan was not available.

4.1 Labour migration and citizenship

Internal migration affects citizenship in post-Soviet Central Asia states (Hojaqizi, 2008), but more so does labour migration which countries in the regions have been experiencing since the 1990s. Labour migration is a significant contributor to social mobility, much of which eventually results in citizenship acquisition in a recipient country. In 2017 (as of October, according to the World Bank) Central Asian states such as Kyrgyzstan, Tajikistan and Uzbekistan received around 2.5, 2 and 2,7 billion USD in remittances respectively. For the first two countries these constitute from one third to almost a half of their GDPs.

Labour migrants tend to go towards neighbouring regions and countries with higher GDP and OECD countries have become a destination for migration from Central Asia. The overall trend of citizenship acquisition by Central Asian citizens in this group of countries has been mostly steady (see Table 13) over a period of two decades, except for Kyrgyzstan and Turkmenistan, whose citizens, due to different reasons, have been acquiring citizenship in OECD at an increasing rate.

Table 13. Acquisition of citizenship in the OECD countries, 2000-20015

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	
Kazakhstan	3091	3256	3795	4921	3315	5041	5438	4151	3814	3502	3484	3984	4070	3970	3940	3386	
Kyrgyzstan	529	461	642	774	810	1031	1035	1162	1137	885	1131	1158	1276	1256	1223	1303	
Tajikistan	526	514	401	274	245	231	266	218	268	340	341	294	249	286	329	279	
Turkmenistan	106	108	265	217	172	188	232	204	222	222	297	301	283	290	281	288	
Uzbekistan	3442	2870	3193	2128	1903	2518	2850	2341	2502	2380	2693	3458	4503	3819	3513	3204	

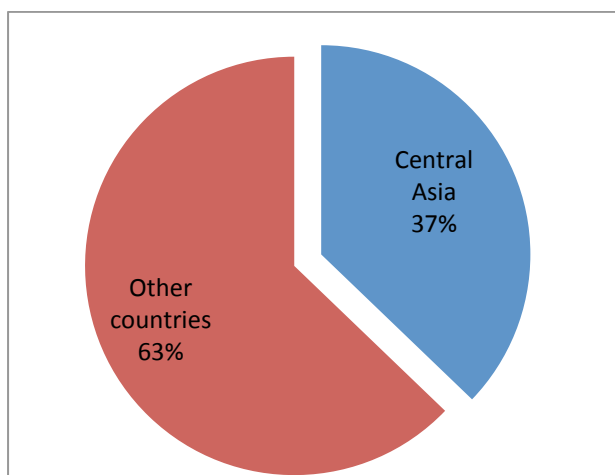
Data source: OECD statistics, www.stats.oecd.org

However, it is Russia (the second largest recipient of labour migrants in the world) where many migrants from central Asia are heading to. Millions of Central Asians working in Russia can become important constituencies for their home countries (Ruget, 2014) and that affects the way policies towards citizenship acquisition, including in regard to dual citizenship, are shaped in some countries of the region. Although labour migration does not occur without tension in the countries of work (Sahadeo, 2007) many migrants are acquiring citizenship in Russia. Back home usually governments openly or tacitly welcome labour migrants' remittances, though the previous president of Uzbekistan publicly reprimanded labour migrants.² Yet concerns about brain drain and threat to sovereignty arose back home when Russia introduced in 2014 a fast track citizenship legislation for Russian speakers from

² Karimov: Uzbek Migrants Are 'Lazy,' Beggars Don't Exist. June 26, 2013, <https://www.rferl.org/a/uzbekistan-karimov-beggars-migrants-remittances/25028531.html>. Accessed May 4 2018

throughout the post-Soviet space.³ Persons from Central Asian countries constitute more than one third of those who acquired Russian citizenship (see Figure 2).

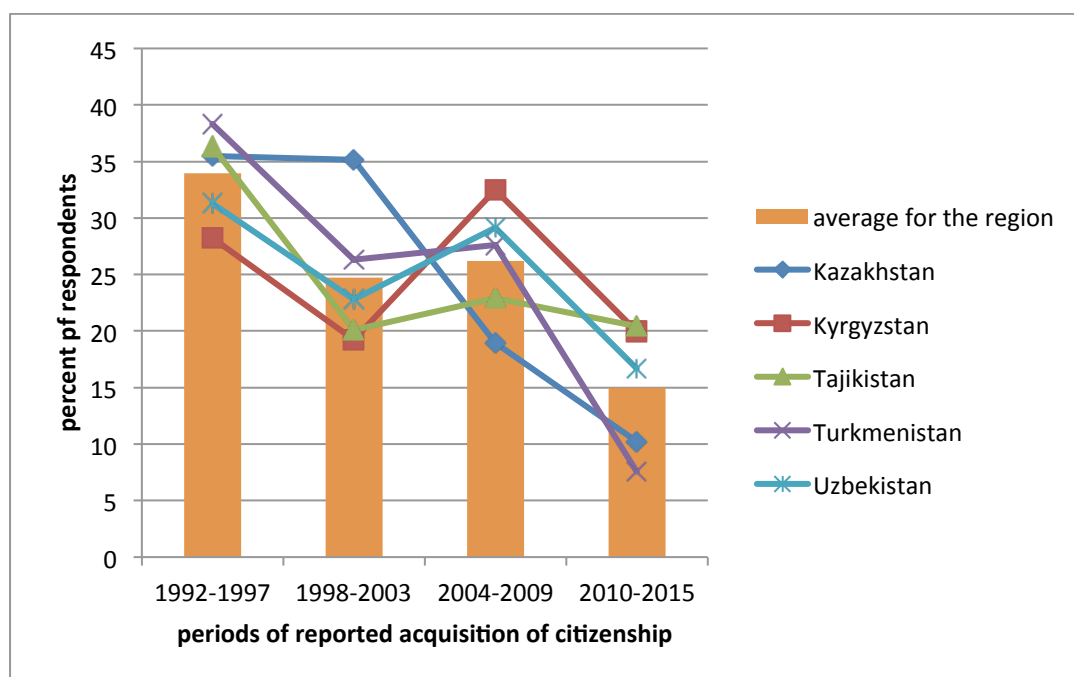
Figure 2. Prior citizenship of countries, survey 2016



Source: State Statistics Service of Russian Federation, <http://www.gks.ru>

Over time (see Figure 3) the proportion of those who acquire Russian citizenship generally declines slightly; the only drastic decline is observed in Kazakhstan, but this could be explained by the ethnic composition of those changing their citizenship.

³ Kyrgyzstan Ponders the Impact of Russia's Citizenship Law Amendments. Apr 25, 2014. <https://eurasianet.org/s/kyrgyzstan-ponders-the-impact-of-russias-citizenship-law-amendments> Accessed May 5 2018

Figure 3. Central Asians acquiring Russian citizenship, time of acquisition, survey 2016

Source: Mini-survey of the State Statistics Service of Russian Federation, <http://www.gks.ru>; NB: only respondents who indicated prior citizenship

These variations could be also explained by the effect of two citizenship laws of the Russian Federation in 1991 and 2003 and in 2009 more tightening regulations were introduced (Chudinovskikh, 2014). According to Chudinovskikh (2014) who based her estimates on data from the Russia Federal Migration Service the trend of overall decline is also observed except for Kyrgyzstan and Tajikistan (see Table 14).

Table 14. Acquisition of Russian citizenship (country of previous citizenship/percent of all acquired citizenship)

Country/ Percent from total	1992-2013	1992-2002	2003-2009	2010-2013
Kazakhstan	27,7	34,4	20,4	20,1
Kyrgyzstan	9,0	5,1	11,1	22,9
Tajikistan	5,2	5,1	5,0	7,1
Turkmenistan	1,5	1,7	1,4	0,6
Uzbekistan	10,8	8,8	13,5	9,6

Source: Chudinovskikh (2014), based on data from Russian Federal Migration Service

5. Conclusions

Citizenship was developed from scratch by the countries of Central Asia as they had to engage in simultaneous nation- and state building after the collapse of the USSR. The nation-building process (Brubaker, 1992) can partially explain citizenship policies adopted by the Central Asian states. In regard to various issues they have developed a similar and standard approach while on some issues they diverged. There was an overall trend for the post-Soviet states to start with universal approaches to citizenship policies and then over time to undergo particularisation of their laws to reflect their specific contexts (Makaryan, 2006) and Central Asia countries shares the same experience.

Particularisation of citizenship policies have taken place due to different political regimes and unequal power of the state in matters of in defining citizenship (Koch, 2015), and also due to ethnic composition and policies towards adjacent countries. Besides, recent statehood, strong sub-national identities and labour migration affected the way citizenship policies are formulated in Central Asian countries (Ruguet, 2014).

On many issues which are commonly present in laws there were no provisions in the legislation of Central Asian states. Institutionalisation of ambiguity has been argued to be characteristic of Russia (Shevel, 2012) and this could be said about Central Asia as well.

All countries rely on the *ius sanguinis* principle in their citizenship policies and their residence terms ordinary naturalisation are similar. There are some policies on dual citizenship in the region though they vary from country to country. Although, for example, Kyrgyzstan has provisions regarding dual citizenship in the law, it has not implemented these in practice, and Turkmenistan had in the past such provision, but abolished it. Divergence is manifest regarding policies towards co-ethnics which are prevalent in cases of less homogenous countries. Granting citizenship to the former USSR citizens is a result of similar legacies of being successor countries.

Ongoing labour migration from Central Asia, primarily to Russia, would not only affect relationship among these countries, but also citizenship policies. Adjacent countries may find themselves in more precarious positions unlike more distant countries who may tolerate dual citizenship amongst each other.

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