Dual Citizenship Debates in Armenia: In Pursuit of National Identity since Independence

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Abstract: Dual citizenship has been a highly contested issue in Armenia since independence. Contesting perceptions of Armenian national identity have largely contributed to diverging policies on dual citizenship. On the one hand, pragmatists have emphasized state security concerns, endorsed a civic type of national identity and rejected dual citizenship. Nationalists, on the other, have emphasized pan-national/ethnic security concerns, endorsed an ethnic vision of national identity and advocated dual citizenship based on ethnic criteria. Following a liberal nationalist approach, this article argues that national identity is not just a function of a pre-existing ethnicity or religion. It is primarily a political phenomenon and requires shared political experiences within a bounded political community. Therefore, granting citizenship to diaspora Armenians with different political experiences and worldviews most probably will restrict the capacity for self-determination among local citizens and will aggravate the existing democratic deficit and endemic lack of trust in government.

Key words: Armenia, democracy, dual citizenship, national identity, nationalists, pragmatists

Constitutional amendments are a pivotal political issue for Armenia. Among several changes that the amended constitution does not contain is a clause banning dual citizenship, specified in Article 14 of the constitution. The issue of dual citizenship in Armenia has been at the heart of political debate since independence. As the National Assembly’s (NA) Deputy Speaker, Ara Sahakyan, announced in 1994, debates around dual citizenship and citizens’ rights and obligations divided the NA into two extreme poles.
This article discusses two interrelated themes. First, it will present official and opposition attitudes on dual citizenship in Armenia from 1994 to 2005. In this section it will be argued that the dual citizenship debate in Armenia is essentially a result of differing perceptions of national identity. While the pre-1998 official discourse on national identity clearly leaned toward a civic type, the post-1998 official discourse is marked by a tendency toward an ethnic definition of national identity. A great deal of the literature on citizenship indicates that the historical link between citizenship and nationality is disappearing as a result of processes such as globalization and the proliferation of human rights. The importance and impact of those processes is undeniable. Yet the Armenian case indicates that the current debates on citizenship are also debates about nationhood. As William Rogers Brubaker argues, debates on citizenship “are debates about what it means, and ought to mean, to be a member of a nation-state in today’s increasingly international world.” Moreover, while adopting international norms and the standardized language of universal rights, states are in a position to mold and adjust the discourse to domestic priorities and security concerns.

Second, based on the theory of liberal nationalism, an argument will be made against dual citizenship in Armenia. It will be argued that concessions and tolerance are possible only when there is trust within “ethical communities,” that is, states whose citizens have special moral obligations to each other, but not to outsiders. The sense of shared national identity (based on shared political experiences), and belonging to a bounded political community, helps sustain the trust and solidarity needed for citizens “to accept the results of democratic decisions and the obligations of liberal justice.”

Some Theoretical Considerations on Civic and Ethnic Typology of National Identity

Since the mid-twentieth-century, scholars have categorized nationalism based on a Western/civic/liberal and Eastern/ethnic/organic definition. According to this definition, civic national identity, which emerged in the late sixteenth-century in Western Europe, and later in North America, is based on concepts of individual liberty, choice, and rational cosmopolitanism. Ethnic identity, which emerged in Central and Eastern Europe in the late nineteenth-century, is based on cultural heritage, ethnic descent, rejection of a rational conception of society, and the absence of individual choice.

Scholars from various disciplines have challenged these assertions by pointing out the cultural foundation of politics—both in ethnic and civic nationalism. In addition to democratic principles, there is always a cultural component to civic nationalism, and thus, there is no such thing as genuine civic nationalism. The most famous examples of civic nationalism, such as the United States, Canada, and Britain, have engaged in both a cultural interpretation of their nation, and the realization of state-building. Switzerland, Belgium, Britain, and the U.S. have cultivated encompassing national identities, despite divisions along linguistic, religious, ethnic, regional, and cantonal lines. Distinct national identities have been cultivated through “inventions” of national myths and...
symbols, and the establishment of democratic, political institutions. Hence, civic national identity, just like ethnic identity, requires “markers of identity,” and shared myths.8

Nevertheless, one should not underestimate the various manifestations and interpretations of ethnic national identity. In his analysis of identity typology, Ronald Beiner notes “the crucial difference is that according to the civic vision, these markers of identity are relevant for every member of the civic community, whereas the national vision applies only to members of the nation . . . So the difference is not the existence of a politically relevant shared culture, but the class of citizens among whom this culture is shared.”9 Similarly, Will Kymlicka notes that unlike some nations, other nations might define their culture in ethnic and religious terms, and that “these variations are crucial to understanding why some nationalisms are peaceful, liberal, and democratic, while others are xenophobic, authoritarian, and expansionist.”10

Since independence, political discourse in Armenia has evolved around contending civic and ethnic interpretations, properly understood. Dual citizenship debates in Armenia are essentially a result of varying perceptions of national identity between pragmatists and nationalists. While the pre-1998 official discourse on national identity clearly leaned toward a civic definition, the post-1998 official discourse has been marked by a tendency to define national identity through an ethnic paradigm. Identity politics represents different ways of understanding national security concerns. While the former emphasizes statehood security concerns, the latter emphasizes pan-national or ethno-national security concerns.

The Challenge of Contesting National Identities in Armenia

The long history of Armenian survival “between, and within, rival imperialisms” gave rise to mixed perceptions of the nation’s self-image. Ronald Suny argues that “an exclusive concentration on survival” has resulted in an “essentialist” understanding of the nation.11 It endorsed the image of Armenians as the “chosen people,” and emphasized the uniqueness of the Armenian Church, which has survived despite historical and political upheavals. Nevertheless, since the collapse of the Soviet Union, Armenia, like other post-Soviet republics, has had to face the challenge of multiple transitions. Forming a comprehensive definition of national identity has emerged as one of the most challenging tasks.12

One component integral to Armenian identity is fear. Gerard Libaridian notes that “the Genocide, its exploitation, and its denial by Turkey have paralyzed the collective psyche of the Armenian people . . . A nation cannot imagine a future if the only thing it can imagine the future bringing is further victimization.”13 Fear of victimization has been cultivated and legitimized throughout Armenian history by intellectuals and political elites. A dramatic consequence of fear has been a constant search for outside protection. While external forces have used fear to justify domination as “protection” from Pan-Turkish attacks, local and diaspora intellectual elites “have managed to nurture among the people a distrust of the ability of Armenians to adequately define their own interests, . . . in short, to govern themselves.”14
Theoretical approaches such as perennialism and ethno-symbolism emphasize the central role of collective memory in defining national identity. Scholars, however, note that nations, while having collective memory, do not possess an accurate knowledge of historical events. Ultimately, these inconsistencies lead to different interpretations of the collective past, and therefore to different visions of the collective future. Indeed, Suny contends that history, which is poorly understood by many Armenians, “was itself a field of contestation between official historians forced to conform to state dictates and the needs of nationalists to recover their own understanding of the Armenian experience.” This has been the case with both Armenian Sovietologists and diaspora intellectuals. It is also the case today between rival local and diaspora political parties in Armenia. Their contesting visions of Armenian national identity is essentially a struggle over the meaning of the past for redefining the present and future.

Libaridian notes that, “Ter-Petrossian’s resignation . . . marked fundamental differences in the understanding of statehood and nationhood between those who want to shape the future of Armenia after Ter-Petrossian.” Pragmatists’ and nationalists’ opposite perceptions of national identity have comprised the core of Armenian politics since independence. Pragmatists question the politics of fear and the viability of an inevitable Pan-Turkish threat argument. Nationalists operate based on the politics of fear, keeping the Pan-Turkish threat argument alive. Pragmatists endorse “negative freedom,” rejecting the one nation–one ideology concept, which eliminates individual choice and self-determination, and hence, is undemocratic. Nationalists endorse the ideology of “positive liberty” and demand that people think of a unifying pan-national ideology as the highest moral end. Pragmatists see Armenia as one nation existing in the world, nothing more nothing less, and believe that Armenia deserves a decent life just as much as any other nation. Nationalist ideology revolves around the vision of Armenians as a “special and unique people” with extraordinary potential and a historical mission.

Pragmatists emphasize the importance of cooperating with regional neighbors, including Turkey, and the international community. Nationalists strive to take on the role of regional leadership, encompassing political, educational, health, and cultural spheres in the South Caucasus. They believe that certain geographical and historical features, as well as Armenia’s high intellectual potential, will help Armenia become a bridge for dialogue and cooperation between states, thus making it a leader in the region. Considering certain geopolitical realities, some nationalists emphasize the need for a “third force,” such as Russia or the West. By aligning itself with Russia, Armenia will be rewarded with Karabakh and ultimately achieve sovereignty. For pragmatists, the desired solution of the Karabakh problem is the establishment of peace and security of the Armenians who live there. Compromises are acceptable to achieve these goals. For nationalists, victories in the Karabakh war justify the Armenian people’s uniqueness and ability to achieve a higher collective cause. The return of occupied territories without status recognition is a betrayal of pan-national dreams, and compromises are unacceptable. In light of state security interests, pragmatists believe that relations with Turkey should not hinge on the precondition of genocide recognition. For nationalists, the
genocide issue must be a part of Armenia’s foreign policy, and some argue that relations with Turkey must be based on the precondition of genocide recognition. Finally, for pragmatists genocide recognition is a moral issue, necessary for historical justice and national healing. Yet the establishment of a strong state, with democratic institutions, civil society, a growing economy, a balanced foreign policy based on realism, and the achievement of peace and security for Armenians in Karabakh, require temporarily putting aside territorial claims and reparation demands from Turkey. Rafayel Ishkhanyan, one of the main ideologists of the first administration, succinctly captures this strategy: “The steps of the Armenian people must be proportionate to the degree of our strength.” For nationalists, Hay Tad (the Armenian Cause, a concept encompassing both genocide recognition and territorial claims), is at the forefront of the political agenda. Therefore, the quest for the recovery of the Armenian territories must be welcomed.

Differences between pragmatists and nationalists encompass a wide array of domestic and foreign policy issues. Despite these differences, however, both pragmatists and nationalists adhere to a certain identity discourse as a reaction to security concerns. They both seek to define national identity on the basis of security concerns. In other words, security concerns are prior to and determine identity politics. Policy choices reflect identity choices. Yet identity choice itself is a dialectical process, as it is a direct result not only of internal political, cultural, and economic pressure, but also of the external package of political pressure and opportunities.

Security perceptions by pragmatists and nationalists are different, of course. This leads to different perceptions of national identity and ultimately to different understandings of citizenship. Intertwined issues of statehood and national security are at the center of Armenia’s political discourse, and there has been no shortage of arguments from either side. What makes them different is that they emphasize state and national security concerns differently. While pragmatists emphasize statehood security concerns, nationalists emphasize pan-national or ethno-national security concerns. This does not mean that pragmatists and nationalists are not concerned with pan-national or state interests, respectively. All it means is that their biggest priority (i.e., state or ethnicity) is emphasized with higher intensity.

_Dual Citizenship Debates: Comparing Pros and Cons_  

**National Identity and the Politics of Civic Inclusion**

Pragmatists emphasize national security and endorse an inclusive vision of state and civic national identity. One of the criticisms of the Armenian National Move-
ment (HHSh), has been the party’s emphasis of democratic and cosmopolitan values at the expense of national ones. In response, Levon Ter-Petrossian has argued that the contraposition of national, democratic, and universal values is artificial. Values endorsed by each concept are compatible and, indeed, complement each other. Referring to developed states he emphasized that in these states democratic values and human rights had been introduced primarily to serve to the well-being of their own people. As Ter-Petrossian argued, “It is difficult to imagine an objective that is more national than this one.”

It is important to note that Ter-Petrossian uses the word people as opposed to nation, drawing a parallel between the people’s well-being and national objectives. This is not an accidental confusion of two concepts. The primary goal of the first administration was the creation of an inclusive state with a civic community and a constitutionally ingrained legal framework, where all citizens, irrespective of ethnic, religious, racial, or any other differences could have equal rights and obligations (Article 15 of the 1995 constitution). This article contains two crucial declarations essential for liberal democracies. First, that citizenship cannot be denied based on discriminatory practices. Second, the legal equality of citizenship rights and obligations is constitutionally guaranteed. Scholars note that there is a strong association between the idea of citizenship and the idea of political equality. If balance is distorted then the creation of first- and second-class citizens with different set of rights and obligations is inevitable.

In his address to the NA in 1994, the first president made it clear that ethno-national ideology must be rejected as dangerous for national security. Instead, the first administration defined national ideology as endorsing a strong, secure, and self-governing democratic state, with civil society, a prosperous culture, and a vibrant economy. The primary objectives of pragmatists have included the establishment of fundamental equality among citizens, the creation of a civic community in which norms and rules of the political culture apply to all members of the political community equally, and the establishment of democratic political institutions, which will serve the citizens’ interests.

Those emphasizing state security perceive of a state as a political community with bounded citizenship, where nationality and citizenship are tied to the territorial boundaries of the country. Article 14 of the constitution reflects this strategy by stating, “a citizen of the Republic of Armenia may not be a citizen of another state simultaneously.” Considering the Armenian diaspora’s interests, and the importance of homeland-diaspora relations, the same article also stipulates, “Individuals of Armenian origin shall acquire citizenship of the Republic of Armenia through a simplified procedure.” Based on this constitutional provision, two important laws facilitating homeland-diaspora relations have been enacted. First, “The Law of the Citizenship of the Republic of Armenia,” was enacted in 1995. Article 13 of the law stipulates that the three-year residency requirement, necessary for obtaining Armenian citizenship, does not apply to ethnic Armenians establishing residency in Armenia. Second, “The Law on Legal Status of Foreign Citizens in the Republic of Armenia,” was enacted in 1994. It allows foreign citizens of Armenian ancestry (and other distinguished individuals rendering significant
services to the Armenian nation) to receive an Armenian passport with Special Residency Status in the Republic of Armenia, for a ten-year term (with the possibility of extension). Moreover, the survivors of the Armenian Genocide are granted this status through an expedited procedure. Bearers of this passport are released from visa requirements to travel to Armenia. While in Armenia, they are entitled to the full protection of Armenian law, and are granted economic rights, except the right of land ownership, which is only for citizens. However, they are denied the right to vote, be elected, or join political organizations. They are also exempt from military service. Charles King and Neil Melvin properly note that the homeland’s attempt “to create a privileged relationship with co-ethnics is a tricky enterprise; it depends on the state’s ability to distinguish between the privileges of membership in a trans-state cultural community from the rights and duties of membership in a legal community defined by citizenship.”

In several articles and publications pragmatists have emphasized their reasons for opposing dual citizenship. While realizing the crucial importance of homeland-diaspora relations, and recognizing that Armenia is the historical homeland for all Armenians, pragmatists believe that granting citizenship based on ethnic criterion threatens state and national security in several respects.

First, granting citizenship based solely on ethnicity is not acceptable in the international community. Ethnic selection must be rejected and cannot be a category for granting citizenship based on the principle of democratic equality. If dual citizenship is instituted, it must apply equally to both diaspora and current Armenian citizens, as well as to other ethnicities. Partial application of legal rights and obligations distorts the constitutionally guaranteed legal equality of citizens (Article 15), and will eventually lead to discriminatory practices.

Second, dual citizenship for ethnic Armenians abroad, particularly in Georgia and Russia, could potentially endanger their security, as they would be viewed as a “fifth column,” and a cause of instability in their respective states.

Third, one of the constitutionally defined citizens’ duties is obligatory military service (Article 47). Civil and political rights are useless if they are not honored and protected. If dual citizenship is instituted, dual citizens, based on bilateral agreements, will have a choice of military service either in the Armenian or in the second country’s army. Given the threat of war in Nagorno-Karabakh, both politicians and scholars agree that citizens will choose not to serve in the Armenian Army. Moreover, to avoid service in the Armenian Army, the number of local citizens seeking dual citizenship will increase, compounding the already existing problem of large-scale migration. Dual citizenship poses a threat to national security, because it will result in the weakening of the national army and the acceleration of emigration.

Finally, a number of states with Armenian communities do not provide the option of dual citizenship. In these countries ethnic Armenians could not obtain dual citizenship even if Armenia were to adopt it. Still, ethnic Armenians are citizens of a number of states, from Russia to the U.S., exercising dual citizenship. The number of Armenians living outside the country ranges from seven to ten million, while the official population of Armenia is three million. Vladimir
Nazaryan, the founding father of the Armenian Constitution, has argued that the constitution has to reflect the reality of an unbalanced population distribution. The possibilities of political influence from abroad, and of a radical distortion of the constitutionally guaranteed equality of citizens are of a magnitude that cannot simply be neglected in the constitutional provisions for citizenship.38

Denial of the diaspora’s political rights was not accepted well by the traditional diaspora political elites, particularly the Armenian Revolutionary Federation (HHD).39 Ter-Petrossian, in particular, has been accused of not living up to his announcement that Armenia is the homeland of all Armenians. This failure has been interpreted as an unjust partition of one historical nation into citizens and outsiders, nurturing distrust toward the Armenian government among parts of the diaspora population. One member of the HHD’s ruling council announced, “imposing distinctions between native Armenians and Diaspora when it comes to involvement in Armenia’s politics is insulting.”40

Among the diaspora population there was an impression they had been granted nothing more than “empty citizenship.”41 Gevorg Poghosyan notes, “diaspora Armenians have the ‘right’ to worry, to take care of Armenia . . . and to render financial assistance to the population of Armenia, but they do not have the right to become Armenian citizens.”42

Derogatory attitudes toward the government became prevalent in the diaspora’s political discourse. The negativity toward the government’s citizenship policy reached academic circles in the West, where the ban on dual citizenship was interpreted as a denial of both Armenian citizens’ and ethnic Armenians’ human rights. For instance, Astouryan writes: “The government decided to deny its citizens the right to be simultaneously a citizen of another country. For many diasporan Armenians who thought naively that their Armenian ethnicity entitled them to Armenian citizenship, this was a major disappointment. It meant that there was no such a thing as a one and indivisible Armenian nation.”43

Tensions in homeland-diaspora relations escalated to the degree where everything done by the homeland government was interpreted as wrong and fundamentally contradictory to pan-national aspirations. In addition to the diaspora’s political elites, particularly from the HHD, some local nationalist parties, such as the Communist Party of Armenia (HKK), National Democratic Unity Party (AJM), and National Self-Determination (AIM), as well as some intellectuals have joined this concerted antigovernment political discourse and action. In the end, the Armenian government and the HHSh, in particular, have been accused of leading the nation to total nihilism, self-denial, and cultural “genocide.”44

National Identity and the Politics of Ethnic Inclusion since 1998

During his 1997 presidential campaign, Vazgen Manukyan, leader of the AJM, made a statement that both captures and summarizes the political trajectory since 1998: “Azerbaijan has oil, Georgia has the sea, Armenia has the Diaspora.”45 Those emphasizing pan-national or ethno-national security perceive of a diaspora as an asset capable of solving economic and pan-national issues.46 Armenia is the homeland of all Armenians regardless of where they live, and there should be
no distinction between Armenian citizens and ethnic Armenians. There lies the
difference between the pragmatists’ and nationalists’ definition of citizenship.

Nationalistic propaganda extolling pan-national unification and ethnic mobi-
lization has become a recurring theme in presidential speeches, political parties’
announcements and platforms, activities of youth organizations funded by polit-
cical parties, and intellectual and religious discourse. The Catholicos of the Cili-
cian See in Antelias, who is traditionally controlled by the HHD, stated during
his meeting with Armenian intellectuals that, “We must rise above thinking locally
and approach issues with a pan-Armenian role in mind . . . it is necessary to
gradually abandon ‘romantic patriotism,’ and embrace a realistic approach to
nationalism.”47 The quest for a strong national identity based on ethnic criteria
has penetrated into the educational sphere as a result of which in August 2002 the
authorities signed an agreement with the Armenian Apostolic Church making the
study of the church’s history a compulsory school subject.48

Ethno-nationalistic discourse is reflected in several party platforms. It is par-
ticularly evident in the ideology of the Republican Party of Armenia (HHK). The
HHK, which is currently the largest party represented in the NA with 23 mem-
bers, and a member of the ruling coalition, endorses the ideology of tzeghagron
(race based religion), which was developed by Garegin Njdeh in the first part of
the twentieth century. The party has created a youth organization called Tzegha-
gron with the objective of raising youth’s awareness of values such as a “mili-
tary-patriotic and healthy lifestyle.” Since 2004, the youth organization has coop-
erated with the Armenian Apostolic Church in the “struggle” against religious
minorities.49

Finally, the quest for national identity based on ethnic criteria is reflected in
the amended constitution. Article 8.1 of the amended constitution establishes the
separation of church and state. However, it grants the Armenian Apostolic Church
special status as the national church, recognizing “the historically exceptional
role” of the church in the formation of Armenia’s spiritual life, culture and nation-
al identity.50

In general, at least at the ideological and constitutional levels, nationalist poli-
tics is a mirror image of the politics conducted up to 1998. There is, however, one
noteworthy shift. Since 1998, political elites’ arguments have been marked by the
parallels drawn between human rights and ethnicity-based rights. The discourses
on dual citizenship and ethnic identity are blended with international norms and
human rights, which blurs the boundaries between human rights and rights based
on ethnic criteria. Therefore, Armenian domestic politics cannot be analyzed apart
from the international community, in which Armenia is only one part.

Since World War II, the context and practice of citizenship has been steadily
changing. Universal declarations of human rights, European Union (EU) citizen-
ship policies, transnational communities, globalization, and technological innova-
tions constantly exert a considerable amount of pressure on governments’ citizen-
ship and immigration laws. Scholars agree that “as the globalization process
produces multiple diasporas,” relations between homeland and host-societies
become increasingly complicated.51 Meanwhile, the traditional idea of national cit-
izenship becomes increasingly problematic, as states are no longer the only source of authority in defining citizenship. Thus, domestic debates over who is a citizen must accommodate, and adjust to, a wide array of external pressures.

A steady trend of the “internationalization” of dual citizenship is undeniable. Dual citizenship is currently practiced by previous empires such as France, Great Britain, and Russia, and by traditional immigrant states such as the U.S., Canada, and Australia, and important labor exporting states such as Turkey, Mexico, and the Dominican Republic. The number of states aspiring to join this trend has yet to grow. Nevertheless, while adhering to international norms and standards, states are simultaneously addressing local issues. Peter Spiro argues that while one cannot ignore the impact of EU citizenship policies on member states, it is still only a regional enterprise. While the United Nations Human Rights Convention (UNHRC) is binding for all member states, the locus of immigration and citizenship laws and their implementation remain within states.52 In short, despite an almost universal adoption of international norms, reflected in lengthy listings of human rights in constitutions and laws, the same norms are revised and redefined in accordance with domestic politics.53

The same external pressures can turn into opportunities, which can solve a variety of domestic issues. Depending on the interests, the language of international norms can be accommodated to the domestic language of national security concerns. For instance, Article 11 of the Armenian Constitution reflects the intertwined relations between international norms and domestic security concerns, as perceived by pragmatists and nationalists. While the 1995 constitution defines the character of homeland-diaspora relations as primarily limited to the cultural sphere, the amended version emphasizes strong homeland-diaspora relations: “Within the framework of principles and norms of international law, the Republic of Armenia shall promote the strengthening of relationships with the Armenian Diaspora.”54

Another curious blurring of international norms with local security concerns is reflected in Article 30 of the amended constitution, which allows noncitizens the right to vote in local elections. This article is hardly intended to protect the interests of migrant workers, as Armenia itself is a labor exporting country. The provision cannot be for the thousands of refugees from Azerbaijan, Nagorno-Karabakh, and Northern Caucasus (total population 360,000), since the law “On Amendments to the Republic of Armenia Electoral Code” (enacted April 21, 2000), gives refugees the right to participate in local elections.55 In numerous articles, particularly since 2003, under the guise of European norms, political elites
have argued for noncitizens’ rights to participate in local elections. The only similar provision can be found in EU citizenship norms, specifically in the Maastricht Treaty, adopted in 1993. Articles 8 through 8e of the treaty specify migrant workers’ rights to vote and stand as candidates in municipal elections. These rights, however, are only applicable to citizens of the EU. Citizens of a country that is not an EU member, such as Armenia, are not entitled to these political rights. In short, international standards do not give noncitizens political rights, and they do not require states to adopt similar laws. Therefore, Article 30 must be construed as another step toward integrating the diaspora into local politics.

When pursuing security concerns, constitutional distortions can be justified on the basis of human rights. The amended constitution does not provide for the political equality of citizens, which is vital for democracies. Article 15 has been deleted and replaced by a provision consistent with the language of human rights. Article 14.1 of the amended constitution states: “People, regardless of race, sex, language, creed, and religious belief are legally equal, have all the rights, freedoms and obligations defined by the Constitution and law and shall be given equal protection of the law without discrimination.”

The above article is designed for people in general, which is, of course, welcoming. However, it does not add to the protection of human rights already protected by the 1995 constitution in Article(s) 4, and 16 through 43. That the amended article and constitution say nothing about the political equality of citizens is new. The two most essential criteria for liberal democracies, citizenship acquisition without discriminatory practices, and the equality of citizenship rights and obligations, are not protected at the constitutional level. The amended constitution provides an institutional framework for the creation of first- and second-class citizens, with different rights and obligations.

Nevertheless, the biggest question here is not whether citizens will have equal rights and obligations. According to defenders of dual citizenship, citizens’ political equality can be regulated through several laws, ranging from residency requirements to obligatory military service. Despite various justifications and explanations, the political equality of citizens will be very difficult to protect, at least through democratic procedures, because it is not protected at the constitutional level. The fact that constitutionally defined political equality has been neglected raises a fundamentally serious question that affects the very nature of democratic statehood. The biggest question is who will qualify to become an Armenian citizen.

The nationalists’ objective is to institutionalize citizenship, which, in practice, will make it available only to ethnic Armenians. Arguments for dual citizenship are only based on ethnic criteria. Both ethno-religious minorities (already citizens since independence) and other ethnic groups abroad are left out. According to the classical definition of ethnic nationalism, provided by Hans Kohn, nationalists do not aim to transform the state into a people’s state, they want to redraw political boundaries so that they conform with ethnographic demands. The current political discourse bears striking similarities with this definition. Questions such as the definition of Armenianness, the elements of Armenian ethnicity, and eligibility for Armenian citizenship, are at the forefront of political discussions.
The NA chairman of foreign affairs has argued that those who marry foreigners should not be eligible for Armenian citizenship. Because dual citizenship will increase emigration, the chairman has argued that restrictions on emigration must be implemented. A member of the Armenian Cause Committee has insisted that dual citizenship be made available only to ethnic Armenians. Among ethnic Armenians, priority must be given to able-bodied males ready to serve in the army. Only soldiers should be granted dual citizenship with full political rights. The NA chairman of state and legal affairs has argued that dual citizenship must be granted based on ethno-religious criteria. Equal access to dual citizenship, without discriminatory criteria, will endanger national security. Finally, the most ardent defenders of dual citizenship agree that the ultimate goal should be pan-national repatriation.58

National Identity, Trust, Democracy: A Liberal Nationalist Perspective
Since independence, Armenia has been facing the challenge of formulating a comprehensive definition of national identity. The battle over Armenian identity has evolved around civic and ethnic conceptions. The main argument has been that the dual citizenship debate in Armenia is essentially a result of contesting perceptions of national identity. Pragmatists, emphasizing statehood security concerns, endorse the civic type of national identity and reject dual citizenship. Nationalists, emphasizing ethno-national security concerns, endorse an ethnic definition of national identity and defend dual citizenship based on ethnic criterion. In this section, based on the theory of liberal nationalism, an argument will be made against dual citizenship in Armenia. Ethnicity (or religion, race, gender, or class) is an invalid criterion for denying political rights to residents of a country. Ethnicity is also unacceptable for granting political rights to nonresidents. Democracy requires a bounded political community where citizens can exercise self-determination through political choices. Nevertheless, effective democratic citizenship also requires a common national identity, which sustains trust within “ethical communities.”

John Stuart Mill wrote that the establishment of free institutions is “impossible in a country made up of different nationalities.”59 David Miller notes that Mill did not mean that free and democratic institutions could flourish only in ethnically homogeneous societies, but rather Mill thought “a common sentiment of nationality could co-exist with linguistic and other cultural differences, and indeed used the Swiss and the Belgians as examples to make his point.”60 Mill especially emphasized the political aspect, as opposed to the ethnic aspect, of national identity. Mill argues that effective cooperation and freedom in a political community can be realized if citizens share not only historical experiences but also political concerns. Ronald Beiner notes, “implicitly Mill suggests that nationality or national identity is not just a function of pre-existing ethnicity or culture, but is shaped by a history of shared political experiences.”61 In a community deeply divided along political concerns, worldviews, and a sense of belonging, democratic citizenship cannot be realized. In other words, “it will be hard for them [citizens] to experience their relationships as a community of shared citizenship, and civic agency (the pursuit of shared purposes) will be impaired.”62
Building on Mill’s premise of national identity, liberal nationalists treat states as “ethical communities”—that is, communities whose citizens have special moral obligations to each other, but not to outsiders. First and foremost, liberal justice and democratic citizenship require a bounded political community, whose citizens united—by common national identity—collectively engage in self-governing. National identity is crucial for enhancing the democratic values of an active and trustful citizenship. Democracy is not just a formula for aggregating votes. Besides the actual moment of voting, the process of self-governance also involves public debate on issues of concern and their solutions. For meaningful debate, citizens must trust each other. Trust enhances the acceptance of the “democratic bargain”; that is, the acceptance of the possibility that conflicting groups could lose in elections, “if they feel that they might win next time, and that others will abide by the results if and when they do win.”63 However, mutual trust is impossible in an unpredictable environment. Therefore, the instrumental dimension of national identity is its ability to provide a predictable and transparent environment in which individuals can have mutual trust and make meaningful choices.64

National identity is only one source of personal identity, but is an important component. Citizens are ready to make sacrifices for their country in a way that they would not make for other groups and organizations. Sacrifices should not only be understood as giving one’s life in defense of one’s country. They also include basic principles such as paying taxes and maintaining the general framework of social justice. To grasp the full force of obligations of national identity, Miller discusses an abstract state where rights and obligations of citizenship are tied to one another by nothing but the practice of citizenship itself. Here, citizens will still enjoy some package of rights provided by the state and in return they will have an obligation “to uphold the co-operative scheme” (e.g., paying taxes, obeying the law etc.). However, in this abstract state citizens will pay only for those services from which they stand to benefit. Therefore, political cooperation will be based on the “logic of strict reciprocity,” where each will contribute in proportion to an expected benefit.65

Once “the logic of strict reciprocity” is fused into the scheme of political cooperation, it becomes difficult to justify and explain several aspects of modern democratic politics. The range of difficulties includes, but is not limited to, providing opportunities to people with permanent disabilities, contributions for common public goods (where the costs carried by an individual are higher than returns), voting in state-wide elections (where an individual voter has almost no chance of affecting the final outcome), or complying with military obligations (where the benefits of a war could not possibly exceed the cost of death). In a hypothetical country under “the logic of strict reciprocity,” no one can reasonably complain about the failure of social justice and fairness.

But when the bonds of national identity enter into the scheme of citizenship rights and obligations, political cooperation, based on the logic of “strict reciprocity,” transforms into one based on the logic of “loose reciprocity.” The “logic of loose reciprocity” implies trust rather than a calculated immediate exchange. In ethical communities an individual or group can support others’ just demands at one
point in time, with the expectation of reciprocity at some future moment. Indeed, it is due to prior obligations of national identity that both modern states and citizens agree to redistributive practices and, in general, are capable of solving several collective action problems. Citizens of an ethical community can claim obligations by appealing to their common identity, and to sacrifices made in the past by one part of the community on behalf of the other. There are strong ethical reasons for establishing a common national identity, applying to all citizens of the bounded political community. This is because “the scheme of co-operation can be based on loose rather strict reciprocity, meaning that redistributive elements can be built in going beyond what the rational self-interest of each participant would dictate.”

Liberal nationalists argue that effective support for social justice is considerably enhanced in societies where there is trust not only within, but also among various groups. Several scholars have emphasized the importance of trust and its effect on democracy. Nevertheless, with a few remarkable exceptions, the literature emphasizing the intertwined relations between national identity, trust, and democratization remains rather limited. Hence, liberal nationalists contend that the aspiration to establish democracy must be accompanied by a search for common grounds of agreement based on which citizens can get involved in the process of democratic development. Political institutions and citizenship (although crucial for democracy) are not enough to engender tolerance, concessions, and trust. Unlike other identities, national identity emerges as one having a powerful mobilizing force that can generate trust and agreement around democratic causes.

Armenia is not only marked by contesting definitions of national identity, but also is marked by an endemic lack of trust and low democratic scores. Ronald Inglehart and Eric Uslaner report low levels of both interpersonal trust and trust in the government in Armenia. According to the World Value Survey of 1995, Armenia, along with Belarus, Moldova, Russia and Ukraine, showed the lowest levels of trust. Similarly, a survey conducted by the United States Agency for International Development (USAID) and the Armenian Sociological Association (HSA) showed very low levels of both interpersonal trust and trust in government. Armenia’s levels of trust have been followed by the marked decline of democratic performance in the country. According to a Freedom House report, from 1997 through 2003, Armenia’s democracy score ranged between 4.70 and 4.69 (transitional governments or hybrid regimes category). The democracy score declined to 5 in 2004, placing Armenia in the category of semi-consolidated authoritarian regimes. In 2005, the democracy score declined further to 5.18, leaving the country in the category of semi-consolidated authoritarian regimes for the second consecutive year. Adopting dual citizenship in a country marked by an endemic lack of trust, a deteriorating democratic trajectory, and contesting national identities, will most probably increase widespread alienation and political apathy.

**Conclusion**

Recent research indicates that trust, both interpersonal trust and trust in government, and social polarization are negatively correlated. Stephen Knack and Philip Keefer argue that individuals and groups in polarized societies have a greater
incentive to renounce policy agreements. “In polarized societies, individuals are less likely to share common backgrounds and mutual expectations about behavior, so it is more difficult to make self-enforcing agreements.” Uslaner finds that “Americans are increasingly likely to deny that their political opponents are part of our moral community. And this has made political life more contentious . . . Consequently, it is increasingly more difficult to arrive at compromises when there is a large ideological gulf between the parties.”

In Armenia, social polarization and the ideological gulf between parties have gone beyond the limits of “usual” political disagreements. Defenders of dual citizenship in Armenia should be cautious of Uslaner’s insightful analysis that in polarized societies both individuals and political parties are likely to deny that their political opponents belonging to the same moral community. Adoption of dual citizenship will most likely compound the existing democratic deficit.

National identity is not just a function of pre-existing ethnicity, culture, or religion. It is primarily a political phenomenon requiring shared political experiences within a bounded political community. Giving citizenship rights to ethnic Armenians around the world who have different political experiences and worldviews will increase social polarization. When citizens are deeply divided along political concerns, worldviews, and a sense of belonging, democratic citizenship cannot be realized. Moreover, ethnicity is unacceptable for granting political rights to nonresidents. Robert Dahl notes that “laws cannot rightfully be imposed on other persons who are not themselves obliged to obey those laws because this would violate the self-determination of all those subject to the laws.” Granting citizenship based on ethnic criterion limits the self-determination of local citizens, especially considering that the diaspora’s population is more than twice the size of Armenia’s population. Democracy requires a bounded political community where citizens can effectively exercise self-determination through political choices.

Finally, when political culture is not equally applied to all citizens, and when political equality of citizens’ rights and obligations are not guaranteed at the constitutional level, the possibility of shared political experiences is prevented. Shared political experiences are essential for sustaining a common national identity, and a common national identity is essential for solving a variety of collective action problems and sustaining liberal democratic values.

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NOTES

1. Recommendations by the Venice Commission, the Council of Europe’s advisory body on constitutional law, cover three main areas: balancing the distribution of power between the executive and legislative branches of the government; election of Yerevan’s mayor through a popular vote; and extending the independence of the judicial branch from the executive branch. A national referendum on constitutional amendments was held on November 27, 2005. Although fiercely contested, the referendum approved the changes, according to the Central Election Commission.


17. In an important respect the Armenian case challenges the “Soviet legacy” hypothesis, which would predict Armenia as having an institutionalized ethnic national identity inherited from the Soviet past. However, this otherwise important literature cannot capture the dynamic nature of national identity and current problems of democratic transition. See Stephen Jones, “Georgia: Nationalism from under the Rubble,” in *After Independence: Making and Protecting the Nation in Post-Colonial and Post-Communist States*, ed. Lowell Barrington (Ann Arbor: University of Michigan Press, 2002).

18. Gerard J. Libaridian, *The Challenge of Statehood: Armenian Political Thinking since Independence* (Watertown: Blue Crane Books, 1999), 45. According to Libaridian, pragmatism is represented by the Armenian National Movement party and nationalism is represented by the National Democratic Union, the Armenian Revolutionary Federation, and the Communist Party.

19. Armenian political discourse on Pan-Turkism is based on the assumption that “the only interest Turkey may possibly have with regard to Armenia is to destroy it and to exterminate its people.” See Libaridian, ed., *Armenia at the Crossroads*, 11 and appendices C1, C2, and C3.


21. For this view, see Tyden Weekly’s interview with Levon Ter-Petrossian, and “Liarjek Joghovrdavarutyunits Menk Derevs Shat Heru enk,” [We are Still Far Away from Consolidated Democracy] *Hayastani Hanrapetutyun*, November 5, 1996.


23. Armenia’s regional leadership role entered the official political discourse in 1998, and has been reflected in numerous articles as well as in a number of party platforms. For example, see Robert Kocharyan, “Hayastane petk e lini taracashrjani amenakayun, kazmakerpvats ev mavor bardsr nerj unetsokh yerkire,” [Armenia Must Become the Most Stable and Organized Country with High Intellectual Potential in the Region] *Hayastani Hanrapetutyun*, February 25, 1998; 2003 party platforms by the Country of Law (OEHK), and People’s Party (JK).

24. For a comprehensive discussion of both “phased” or “step-by-step” and “package” solutions to the war in Nagorno-Karabakh see Libaridian, *The Challenge of Statehood: Armenian Political Thinking since Independence*.

25. The post-1998 administration is slowly changing its policy of rejecting compromise-based solutions. Nevertheless, the issue is very complicated at this point, despite the few other formulas proposed by the involved parties.

26. Despite serious criticism targeted against the first administration, Kocharyan and his administration continued their predecessors’ official policy on Armenian-Turkish relations. However, right after his election, Kocharyan announced that the problem of genocide recognition by Turkey and the international recognition of the genocide must be part of Armenia’s foreign policy agenda. Most significantly, see Robert Kocharyan, “HH Nakhagah Robert Kocharyani eluite MAK-i Gikhavor asambleayi 53 nstashrjanum,” [Republic of Armenia President Robert Kocharyan’s Speech During the UN General Assembly’s 53 Session] *Hayastani Hanrapetutyun*, September 26, 1998. This announcement has been taken in Turkey as a signal of the diaspora’s, particularly Armenian Revolutionary Federation’s (HHHD) growing power base in Armenia. In addition, HHD members of the NA invariably insist on genocide recognition by Turkey, either directly or indirectly. During an official meeting between Norwegian and Armenian parliamentarians, Vahan Hovhannisyan, RA NA Vice President, stated that “not having diplomatic relations with Turkey, the land blockade of Armenia, and the issues related to the conflict have one beginning—the 1915 Armenian Genocide.” See *First Time in Armenia*, June 22, 2005, available at http://www.parliament.am/news.php?do


36. See Levon Ter-Petrossian, “Jokhovrdi bareketsutyunn u erki bargavatshume apa-hovenk masin,” [Let’s Secure the Well-being of the People and Prosperity of the State Together] Hayastani Hanrapetutyun, December 26, 1995. This is particularly true for Armenians, who compose a majority in the Akhalkalak/Javakheti region of southern Georgia (bordering Armenia). The mobilization of the Armenian community in Russia is not beyond the possibility either. Russia is the largest recipient of Armenian migrant labor, totaling 78 percent. 68 percent of remittances in 2002 were from Russia only. For an excellent analysis of Armenian labor migration and remittances, see USAID/Armenia, “Remittances in Armenia: Size, Impacts, and Measures to Enhance Their Contribution to Development,” October 1, 2004, available at http://hdr.undp.org/docs/network/hdr_net/Armenia%20Remittance%20Report.pdf.


39. The HHD was banned by presidential order in December 1994. Despite the critique of the ban, the HHD violated the Armenian law on parties, according to which political parties, irrespective of ethnic origin, cannot be controlled from abroad. See Gerard J. Libaridian, Modern Armenia: People, Nation, State (New Brunswick, NJ: Transaction
Publishers, 2004), 238.


41. The concept is applied to a group of people who may be active in a country without having full citizenship rights.


48. This agreement has raised a concern among international organizations, particularly regarding the rights of ethnic and religious minorities. Ethnic and religious minorities compose 3 percent of the total population. See European Commission Against Racism and Intolerance (ECRI), CRI (2003) 36, Report on Armenia (adopted on December 13, 2002 and made public on July 8, 2003).


54. See note 50.


57. See note 50.


60. Miller, *On Nationality*, 98.


62. Ibid.


66. Ibid., 73.


Armenian citizenship is relatively easy to acquire and it can be passed to future generations or renounced. If you resided in Armenia for at least 365 days during this two-year period, or you have a common child who is an Armenian citizen. In practice, the 365-day residency requirement is considered to be met if the applicant has maintained an Armenian residence permit (temporary, permanent or special) during that period, irrespective of the number of days he/she actually spent in Armenia. A "child" is defined as a person under 18 years of age. Before Armenia legalized dual citizenship in 2005 special passports were very common among ethnic Armenians who did not want to renounce their current citizenship. View Dual Citizenships Research Papers on Academia.edu for free. The laws on dual citizenship in 7 EU countries are described. 2 EU countries (NL and DE) recognize only single citizenship, but in certain cases dual nationalities apply. The rest of the EU countries in this book have full dual citizenship laws. This book is a contribution of the Task Force Immigration and Nationality Indonesian Diaspora Network - EU (IDN-EU) in the 3rd congress of Indonesian Diaspora, held in Jakarta in August 2015. Indonesian Diaspora has since its first congress in Los Angeles in 2012 been fighting for dual citizenship. Since independence, political discourse in Armenia has evolved around competing civic and ethnic interpretations, properly understood. Dual citizenship debates in Armenia are essentially a result of varying perceptions of national identity between pragmatists and nationalists. While the pre-1998 official discourse on national identity clearly leaned towards a civic definition, the post-1998 official discourse has been marked by a tendency to define national identity through an ethnic paradigm. Identity politics represents different ways of understanding national security concerns. While the