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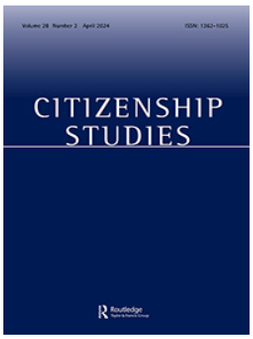

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Transnational citizenship: political practices of Kurdish migrants' descendants in France and Germany

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ABSTRACT

Over the last decades, scholars have increasingly called for the 'deterritorialization' of the notion of citizenship. The realities concerning citizenship have changed with new expressions of transnationalism. However, whereas the main body of research has focused on the transnational aspects of citizenship among migrants in the form of their transnational political practices and dual nationalities, their descendants have received far less attention. This paper examines the political practices of Kurdish migrants' descendants in France and Germany and their narratives of identity and citizenship. We employ migrant descendants' political activism as an empirical entry point to gain insight into the meanings they attach to citizenship. The paper draws from two qualitative datasets collected in France (2015–2017) and Germany (2015–2023) with individuals of Kurdish background, who were born to migrant families arriving from Turkey in the 1980s and 1990s. The findings show that national contexts – both in grandparents'/parents' country of departure and the country of arrival – and the transnational, diasporic and even supranational space (EU) shape migrant descendants' political activism, identity construction and consequently resonate in the meanings they attach to citizenship. This study highlights the need to approach migrants' descendants as transnational citizens in their own right.

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Introduction[1]

In the 2000s, the calls to 'de-territorialise' citizenship and to consider its manifestations beyond national boundaries have been increasingly under scrutiny. This has stemmed from observations that citizenship is characterised by new expressions of transnationalism. Indeed, citizenship has been approached in the context of transnational and global flows, actors and migrations, with studies looking at how migrants' practices of citizenship extend to several legal, institutional and political systems within which they claim rights and privileges (Glick Schiller 2005; Bauböck 2017; Collyer 2017; Stevens 2023). Whereas most studies have focused on migrants, less attention has been paid to their immediate descendants, the so-called second generation[2] (Kaya 2012; Ho 2019; Riniolo

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and Toivanen 2023). However, migrants' descendants are rarely approached as transnational citizens in their own right – regardless of them often holding dual citizenship and/or engaging in political activism that extends to the legal, institutional and political spaces of several states (Mügge 2010; Baser 2015; Toivanen 2021).

This paper contributes to the existing literature on citizenship, identity and political activism by focusing specifically on migrants' descendants in two national contexts. By examining how Kurdish migrants' descendants in France and Germany engage in political activism and how it relates to their narratives of identity and citizenship, we can unravel how their citizenship practices are shaped by the transnational diasporic space, but also by multiple legal memberships and different country-specific structural factors, such as regimes and notions of citizenship. We provide comparative insights into the following questions: what political practices do Kurdish migrants' descendants in France and Germany engage in? How do they relate to their own understandings of identity and citizenship? What spatialities are at play in their practices and narratives? Finally, we offer conceptual insight into the workings of transnational citizenship among migrants' descendants.

The paper draws from two qualitative datasets (interviews, observations) collected in France (2015–2017) and Germany (2015–2023) with individuals of Kurdish background, who were born to migrant families who moved to these destination countries from Turkey in the 1980s and 1990s. It provides comparative insights into their political practices, narratives of identity and meanings attached to citizenship. We argue that migrant descendants' citizenship deserves more attention beyond the formal and territorially based approaches to it as a formal status. This study shows that diasporic, transnational and (supra)national spaces shape the narratives and meanings attached to citizenship among migrants' descendants. The transnational diasporic space and the more nation-state specific structural factors (such as the notion of citizenship) not only shape their identity construction but also their political claims and consequently the meanings they attach to citizenship. Indeed, this study highlights the need to approach migrant descendants as transnational citizens in their own right. We will first discuss the relevant literature before contextualising the case studies. This is followed by notes on the methodology and analysis.

Transnational citizenship: spatialities and situated practices

In line with calls to 'deterritorialise' citizenship, scholars have increasingly referenced *transnational citizenship* (Bauböck 2007; Smith and Bakker 2011; Collyer 2017). This is motivated by the aim to contest the long-standing centrality of the nation-state and territorial limitations in conceptualisations of citizenship. Soysal (1994) discussed already in 1994, the emergence of post-national membership based on universal personhood, instead of national belonging. The calls to 'deterritorialise' citizenship stem from the observation that citizenship constitutes of practices grounded in diverse identities and multiple connections beyond the nation-states' legal and institutional boundaries (Smith and Bakker 2011; Fitzgerald 2012; Collyer 2017). Migrants have been approached as transnational citizens: their transnational political activism extends beyond national boundaries to several states and dual nationalities grant them rights while also imposing obligations on them (Glick Schiller 2005; Bauböck

2007; Smith and Bakker 2011). Also, states have extended certain rights to non-resident citizens, such as voting from abroad (Umpierrez de Reguero, Finn, and Peltoniemi 2023), yet another example of the transnational and deterritorialised expression of citizenship. For instance, Bauböck (2007, 2395) refers to transnational citizenship to describe 'a triangular relation between individuals and two or more independent states in which these individuals are simultaneously assigned membership status and membership-based rights or obligations'.

Instead of considering citizenship merely a formal status dictating rights and obligations or a passive criterion of belonging to the national community, scholars have approached citizenship as a social practice (Ehrkamp and Leitner 2013), one that can also have emotional and affective (Ho 2019) or yet instrumental value (Papazian and Öztürk 2023; Stevens 2023). The focus has been on the *meanings* individuals attach to their citizenship status (Isin and Nielsen 2008; Ehrkamp and Leitner 2013; Stevens 2023). For instance, Ehrkamp and Leitner (2013, 128) argue that there is a need to consider citizenship as a social practice because 'individuals engage in beyond the state, through organizations of civil society and civic actions at different geographical scales'. They further call for a relational approach that would allow treating citizenship not as national versus post-national (or transnational) citizenship, but instead as 'multiscalar, involving numerous discourses and practices from the local to the national and supranational scale' (p. 132). Drawing from these observations, we focus on migrant descendants' political practices that are situated and that extend to different spaces, which in turn inform the meanings migrants' descendants attach to citizenship.

Migrants' descendants and (trans/national) political practices

While their parents as first-generation migrants underwent political socialisation in the home country then political resocialisation in the destination country (Finn 2020), their children are raised in a different transnational space. This is a setting where they are 'socialised into the rules and institutions of the countries where they live, but also into those of the countries from whence their families come' (Levitt 2009, 1226). The transnational space can offer incentives to engage politically towards the diasporic homeland, and contacts, networks, skills and cultural and political repertoires that are potentially useful to that effect (Riccio and Russo 2011; Toivanen and Baser 2022). The political, transnational activities can include taking part in the political processes in the ancestral 'homeland', in form of external voting, fund-raising, being a remote partisan for a homeland political party, and participating in overseas rallies of the homeland political parties. Activities can also be directed to 'host country' political actors, through protesting, lobbying and raising awareness initiatives (Yener-Roderburg 2020, 2022, 2024; Toivanen 2021; Umpierrez de Reguero, Yener-Roderburg, and Cartagena 2021; Toivanen and Baser 2022).

What motivates migrants' descendants to engage in political activism towards their parents' homeland that most have only visited occasionally, or not visited at all? A sense of identity and belonging towards the diasporic 'homeland' seems to be one of the various motivation factors to engage politically (Baser 2015; Toivanen 2021). The diasporic space has been suggested to be significant for political organisation and identity construction in the case of ethno-national diaspora groups, such as the Kurdish diaspora (Alinia 2004).

The social and political organisation of a diaspora community, socialisation into political activism since childhood, and the narratives evoked of the diasporic 'homeland' can provide powerful and meaningful incentives to participate in diverse ways.

Previous studies on migrant descendants' political practices and identities show how they also take part in national politics in the countries where they were born (Riccio and Russo 2011; Kyei, Koomson-Yalley, and Dwumah 2020; Toivanen 2021; Yener-Roderburg 2022). Their political practices, whether national or transnational, are shaped by local and national dynamics, including citizenship regimes and notions of citizenship (Baser 2015; Riccio and Russo 2011; Toivanen 2021; Riniolo and Toivanen 2023). For instance, Kyei, Koomson-Yalley, and Dwumah's (2020) study on Ghanaian migrants' descendants in the Netherlands shows that national citizenship laws can dictate the extent migrant descendants engage in transnational political practices. Kaya (2012, 168) also studies the multiple connections between structures of German and Turkish citizenship through a case study on German-Turkish migrants' and their descendants' political practices. Concluding that such practices constitute evidence of migrant descendants' transnational citizenship, he observes that 'The habitats of meaning of German-Turkish transmigrants are shaped by social, cultural, economic and political imperatives of both countries in a way that equips them with a rather more vibrant set of identities: more cosmopolitan, more syncretic and more transnational' (p. 168). These empirical studies underline the need to examine how diverse spatialities shape migrant descendants' political activism and the meanings they attach to citizenship. In the following subsections, we outline the relevant background on legal and interpreted meanings of citizenship in the different country contexts.

Kurdish diaspora formation

'We're here because it's our duty, it's a battle our parents fought for many years and that we must continue'.[3]

The Kurdish diaspora community formation in Europe from the 1950s onward is connected to both economic labour migration and forced migration, the latter due to a series of armed conflicts in Kurdistan (Hassanpour and Mojab 2005). From the 1950s–1960s onwards, large numbers of Kurds started to migrate from Turkey as labour migrants but also from Iraq, Iran and Syria, more often for political reasons, as refugees and asylum seekers to Germany, France, Great Britain, Belgium, the Netherlands and later to the Nordic countries (ibid.). It is difficult to provide exact figures for Kurdish migrants in Europe. For instance, France and Germany register migrants according to their nationality, not mother language or ethnicity. However, the estimates move between 1.7 and 1.9 million Kurds in Europe (Kurdish Institute of Paris 2016). The great majority of Kurds in Europe is mostly politically active Kurds from Turkey, and an estimated number of 1.2–1.5 million Kurds is residing in Germany (ibid.). The Kurdish community in France is also among the largest in Europe, after Germany, accounting some 230,000–250,000 individuals in 2016. About 80% of Kurds in France originally come from Turkey, with smaller communities coming from Iraq, Iran and Syria (ibid.).

Kurdish diaspora communities in Europe form a rather heterogeneous group in terms of language, religion, political affiliation, citizenship, residence in urban or rural setting and so forth. However, it has been shown that the Kurdish diaspora

communities in different European countries are politically active and well organised in diaspora associations, particularly in pro-PKK associations (Østergaard-Nielsen 2001; Karagöz 2017; Wahlbeck 2019; Yener-Roderburg 2022). Both in France and Germany, where Kurdish migrants from Turkey form the large majority of Kurdish migrants, set the political agenda on the Kurdish issue through their highly influential institutionalised networks and connections (Casier 2011b; Yener-Roderburg 2022, 2024; Yener-Roderburg and Yetiş 2024). Furthermore, diaspora Kurds' transnational political activism is not automatically directed towards their origin-country, but towards Kurdistan more broadly. For instance, diaspora Kurds from Turkey mobilised in Europe after ISIS attempted to invade territories in the Kurdish inhabited region in Northern Syria in 2014–2015 (Toivanen 2021; Schøtt 2021).

The Kurdish communities in France and Germany share similarities in terms of migration waves that can be traced back to labour-induced migration and forced migration waves from Turkey (Ammann 2005; Hassanpour and Mojab 2005). However, migrants' reception and settlement have taken place in a different legal and political framework vis-à-vis the French and German states.[4] State policies regarding migration and integration, notions of citizenship and national belonging have shaped Kurdish migrants' experiences of settlement and the formation of diaspora communities in these two countries. For instance, the German state's approach to Kurdish diaspora politics has previously been rather suspicious with Kurdish activism till recent years (Baser 2017), whereas the French state's attitudes have been to some extent more lenient and tolerant (Toivanen 2021). In both countries, however, politically active and the Kurdistan Workers' Party (*Partiya Karkerên Kurdistanê*, PKK) affiliated Kurds have faced criminal charges, and some non-citizens have even been deported back to Turkey (Toivanen 2021).

Notion of citizenship in France, Germany and Turkey

France and Germany have differing regimes and notion of citizenship, based on a different understanding of cultural and political belonging (Kastoryano 2005; Pogonyi 2022). In France, civic belonging to the state dominates over ethno-nationally premised notions of nationality, whereas in Germany, despite the recent advancements,[5] there is a strong ethno-national component in nationality, visible in the country's naturalisation laws. In other words, the French notion of citizenship is determined by 'right of soil' (*jus solis*), granting migrants' descendants automatically citizenship, whereas, in Germany, the 'right of blood' (*jus sanguinis*) principle was the only way to acquire citizenship until 2000, when the new nationality law made citizenship acquisition possible through naturalisation and *jus soli* (Brubaker 1992; Ehrkamp and Leitner 2013; McFadden 2019). Also, when it comes to the dual citizenship enactment, France and Germany differ drastically (Kastoryano 2005). While France enables individuals to keep their former citizenship,[6] Germany only grants the dual citizenship right for the EU-citizens and the Swiss since recently (DW 2024). In other words, third-country nationals, including Turkish citizens, when eligible, were granted German nationality at the expense of their former citizenship. The new nationality law, which will enable dual

citizenship for nationals of countries that previously prohibited it – including for Turkish citizens – is expected to take effect in late June 2024.[7]

The (legal) notion of citizenship and nationhood in Turkey have shaped, directly or indirectly, the political status, experiences of exclusion and diaspora activism of those diaspora Kurds, who hold Turkish citizenship. The nationalist project in Turkey in the late twentieth century constructed the Kurdish minority as the national 'other' to be targeted with fierce assimilation policies. From the new republican period onwards, the Turkish national identity had clear boundaries of ethnic belonging based on common 'Turkishness', and the Turkish citizenship policies were strongly civic republican in rhetoric (Kaya 2012). With the coup d'état in 1980, the Turkish state went beyond refusing the Kurds their linguistic and cultural rights, thus operating as a backdrop of Kurds' political mobilisation and forced migrations from the country in the 1980s and 1990s (Zeydanlıoğlu 2008).[8]

Following the settlement of Turkish and Kurdish migrants in Europe that led to the renouncing of the Turkish citizenship and adopting that of the destination country, the Turkish government took measures in form of a nationality law in the 1980s (Çağlar 2004; McFadden 2019). The 1981 law allowed non-resident citizens to hold multiple citizenships and to re-acquire Turkish citizenship at their will. An amendment in 1995 introduced a de facto dual-citizenship status (known as 'citizenship light' or 'pink card' and 'blue card' from 2004 onward) granted solely to former Turkish citizens naturalised in Germany. This card provides every privilege that citizenship could bring (Çağlar 2004; McFadden 2019) besides the right to elect and be elected.[9] Due to census data collection methods, it is not possible to know the exact number of Kurds who have renounced their Turkish citizenship or hold dual citizenship. However, as of the 1980s, with the increase in the number of Kurdish political asylum seekers from Turkey (Ammann 2005; Hassanpour and Mojab 2005), fewer have chosen to keep the Turkish citizenship. Despite Turkey's attempts of encouraging its citizens to keep their ties as citizens with dual citizenship or through pink/blue card as 'citizenship light' (Çağlar 2004), the Kurds have in many cases renounced their Turkish citizenship regardless of the possibility to gain a dual citizenship (Yener-Roderburg 2022). Those granted a refugee status and with a pending arrest warrant upon their return to Turkey have become naturalised citizens whenever possible.

Methodology

This paper draws from two qualitative datasets. The data for France were collected between 2015 and 2017. It consists of observation data in political and cultural events and 30 interviews conducted with Kurdish migrants' descendants in Paris. The data for Germany was collected between 2015 and 2023, consisting of 26 interviews with Kurdish migrants' descendants in Cologne, Dusseldorf, Essen, Frankfurt, Hamburg and Wuppertal. Both datasets have a balanced gender distribution. In the French dataset, the interviewees were between 19 and 35 years old, whereas the age distribution in the German dataset was between 23 and 51. Most interviewees had been born in France and Germany, while a few had arrived with their parents at a young age. All interviewees' parents had moved from Turkey in the 1980s and 1990s. The interviews in France were

conducted in French, and in Germany in Turkish, German and Kurmanji. We used a snowballing method in both countries and tried to reach interviewees who were active in diaspora and political organisations, as well as those who were not affiliated to such organisations to gain a balanced account of the meanings attached to citizenship.

Interview questions included themes of transnational ties and attachments, political activism (type, frequency, meaning), identity and citizenship. All interviews were transcribed, and the method of thematic analysis was applied (Guest, MacQueen, and Namey 2012). Our analytical strategy was to focus on transnational political actions, networks and connections. We posit that political practices offer an empirical entry-point to study the meanings attached to citizenship among migrants' descendants (see Kaya 2012; Kyei, Koomson-Yalley, and Dwumah 2020). The two country cases were chosen for comparison, as they represent differing notions of national belonging based on citizenship as well as different citizenship regimes (Brubaker 1992), yet they have similar demographics in terms of the Kurdish diaspora population and to some extent even the history of Kurdish migrations (Hassanpour and Mojab 2005). The comparison, hence, allows to flesh out how the national context resonates in the narratives of citizenship among migrants' descendants, who originate from the same diaspora communities.

Considering the politically sensitive nature of interviewees' activities, we paid particular attention to ethical considerations concerning data collection and preservation, anonymity and data analysis.[10] We have anonymised the respondents' names and ages and refer to them with pseudonyms. We did not experience major challenges in gaining the interviewees' trust, regardless of the sensitive nature of the questions. Being positioned as Finnish and as a Turkish-Kurdish researcher, affiliated to a university institution, did not seem to politicize our researcher positionality vis-à-vis the interviewees, as it might have done with another 'ethnic' background (see Baser & Toivanen 2018). We offered the option to the interviewees concerning the choice of location, which meant that often the interviews were conducted at participants' homes, cafeterias and premises of diaspora and political organisations. In the following, we present the results of two case studies conducted in France and Germany, followed by a discussion providing comparative insights.

Case study in France

De-territorialised political activism and cross-border citizenship

Kurds' transnational political actions in France were situated in the broader context of political mobilisations that took place across Kurdish regions and in countries with sizeable Kurdish populations in the 2010s, following the events in Syria, Iraq and Turkey. At the core of this political mobilisation that also touched the Kurdish migrants' descendants in an unprecedented manner was the rise of ISIS in the Middle East and the highly mediatised war that the Kurdish troops led against the terrorist organisation. This resulted in different types of local and transnational political activism among the Kurdish diaspora community across Europe, including among the migrants' descendants (Schøtt 2021; Toivanen 2021).

Most interviewees shared similarities in political activism and meanings attached to it, regardless of the heterogeneity in parents' educational, religious or social class

background, city or region of origin in Turkish Kurdistan, or yet migration trajectories and settlement experiences in France. Such activities included participation in political demonstrations, electoral activities (external voting and election monitoring campaigns in Turkey), humanitarian convoys and fund-raising towards the Kurdish region in Syria. They also consisted of online activism, including translating and blogging on the Kurdish issue and organising and participating in campaigns and seminars to raise awareness of the situation of Kurds in Syria and Turkey, and even in some cases, short-term visits to the Kurdish regions.

In terms of formal and more institutionalised practices, interviewees engaged transnationally via pre-existing associations, including the already-existing diaspora political structures and networks (Casier 2011b; Yener-Roderburg 2020, 2022). Also, new diaspora organisations saw the daylight in the 2010s, which particularly targeted migrants' descendants (see Schøtt 2021). The interviewees also participated in private initiatives of a semi-institutional nature, such as funding humanitarian convoys or organising awareness-raising events. Dilan, a 26-year-old activist, described the activities of a diaspora association that were organised in a local university in Paris:

> R (researcher): So, is it mostly migrants' children who take part in the activities?
>
> **Dilan:** Exactly, we are active at Paris 8 University . . . We meet up weekly. Every committee meets up in their university and us, as co-responsible for each university, we coordinate and then all meet together every second week to manage activities.
>
> **R:** Okay, and what sort of activities do you then organise?
>
> **Dilan:** Conferences, seminars, film showing and debates, cultural days, festivals, a bit of everything.
>
> R: Is it for the purpose to gain visibility, to raise awareness?
>
> **Dilan:** It's specifically to give voice to the situation back there, to make the Kurdish question more known, to meet up with students who are interested in the region and also to create connections, and in the long term to maintain those connections and work together on the Kurdish question.

Dilan's account shows how the politically active Kurds were embedded, operating and informed by the transnational diasporic space (see Levitt 2009). Lobbying activities towards local politicians to raise awareness of the Kurds' situation in the Middle East were one example of localised forms of activity with a clear diasporic and transnational dimension. In this case, the social practice of citizenship took place through diaspora associations and networks, as in Dilan's example, but also through student associations at different universities, local leftist networks and NGOs, i.e. the local civil society. This echoes Ehrkamp and Leitner's (2013, 144) call to approach citizenship from a relational perspective and to consider how it is practiced and constituted 'through the state and institutions of civil society and through civic actions, and at multiple geographic scales ranging from the local to the supra-national'.

Their efforts to raise awareness on the ongoing plight of Kurds in the Middle East to local students in Paris and to create and foster connections with them to work towards the Kurdish question evidence the diverse overlapping spatialities that the interviewees were embedded in the transnational social space that includes transborder networks,

communications and relationships but also the local context through which specific political practices are played out and take specific forms (see Glick Schiller 2005). The activities Kurds took part in were transnationally and diasporically orientated in terms of the contents, yet locally situated in their organisation and target audiences.

Considering citizenship as a social practice allows focusing on less formal and everyday modes of political participation that do not necessarily inscribe into institutionalised practices within the state. The online activities that the interviewees participated in included blogging, distributing information on Turkey, Kurdistan and the Middle East, circulating petitions, communicating their own views, engaging in online debates, and also in some cases using social media platforms to organise activities, events and seminars to raise awareness of the situation of Kurds. This they did in French, Turkish and Kurdish. At the same time, it meant that they were frequently and visually informed by the events taking place in Kurdistan. Indeed, the sensitisation to the conflict in Kurdish territories took place via the embeddedness in online (diasporic and other) spaces where images and videos of the Kurds' combat against ISIS were circulated. They evoked a common sense of solidarity and identity that underpinned the motivations to become politically engaged towards Kurdistan. As Riniolo and Toivanen (2023, 306) discuss, migrant descendants' political practices can be sporadic and mundane, either routinized or occasional through which they situationally and relationally choose 'where they belong'. The interviewees' preference towards more informal and mundane political activities was related to existing political divisions within the Kurdish (diaspora) communities. Their reasons to be politically active were explicitly motivated by their engagement towards the broader Kurdish community and Kurdistan, not Turkish Kurdistan or the Turkish-Kurdish (diaspora) community *per se*.

Kurdish by ethnic identity, French by civic belonging

> Of course, our generation, if we are more interested in what is taking place there, it is because our families are in the front lines. Even if we live here, we follow the politics back there. If there's a dictatorship in Mali, it won't interest us, because we know nobody back there. But if there is a dictatorship in Turkey, the first people to be touched by it are our families, our uncles, aunts, cousins and it is for us to do something about it. (Azad, 28)

Azad links the necessity to engage politically towards Kurdistan to the existing kinship connections in Turkey by stating that 'our families are in the front lines'. The migration history of the interviewees' families dated mostly back to the 1980s and can be categorised as both labour-related migration and as a form of forced migration (Hassanpour and Mojab 2005). Regardless of the parents' status with which they had arrived in France, the narratives of exile were frequent in making sense of the family's migration history. Also, the feelings of injustice and outrage over the treatment of Kurdish populations in Turkey and in the Middle East and the need to act in the face of the threat posed by ISIS were motivating factors listed for being politically active.

The significance of the transnational diasporic space, in which Kurdish migrants' descendants had grown up, was also visible in the practices and meaning-making processes concerning citizenship. Concerning the research participants' formal citizenship status, out

of the thirty interviewees, eighteen had French citizenship, five had Turkish citizenship and seven had dual citizenship in both countries. There was variation concerning the meanings attached to the Turkish citizenship. Some viewed it more positively as it had strategic and instrumental value, when opening a bank account, buying property or voting in Turkey (see Papazian and Öztürk 2023; Stevens 2023). In contrast, one negatively viewed issue concerning the Turkish citizenship was the mandatory conscription for male citizens. Male interviewees abhorred the idea of completing the military conscription in Turkey as a Kurd and of being a representative of the Turkish state's institution, as shown by Rebin who held dual nationality:

> In fact, I am a Kurd with a Turkish and French nationality. With the Turkish nationality, you have to complete the army. But don't forget that I'm Kurdish. They put Turks in good positions, and Kurds to the dangerous ones. (Rebin, 24[11])

There was a certain ambivalence expressed towards the Turkish citizenship, in the sense that the interviewees practiced their Turkish citizenship rights through extraterritorial voting and travelling, but they did not trust the Turkish state (McIlwaine and Bermudez 2015; Yener-Roderburg 2022). Their transnational political activism for the Kurdish cause, i.e. their transnational political practices, put them in a potentially vulnerable position had they been Turkish citizens and Turkish citizens only. Sirwan tells of his experiences when trying to renounce his Turkish citizenship:

> I applied to renounce my Turkish nationality and Turkey refused, whereas I have many friends who have been stripped of their Turkish nationality randomly. But now they refused, so they still have some power on me. However, in terms of international politics, France is more powerful than Turkey, and if France demands something, Turkey has to follow. That's the advantage I had, to have French nationality. Had I only the Turkish nationality, I would have been thrown to jail and never got out. I'm certain of that. (Sirwan, 30)

The meanings that research participants attached to Turkish citizenship shaped the meanings attached to the French citizenship, thus forming a dialogical relationship between the two citizenship regimes (see Kaya 2012). Indeed, the French citizenship status was considered to provide 'diplomatic' protection and safety in case of encountering political problems in Turkey. This was not only a feature of the French citizenship status but a citizenship status in an EU country, showcasing how supranational citizenship was attached to both instrumental and protective value (see Papazian and Öztürk 2023; Stevens 2023). For instance, Serhat told of a situation where Turkish officers had treated roughly an underaged Kurdish boy travelling in a bus in Istanbul, which had led him to interfere in the situation. The officers' reactions changed when they saw his French ID. He reflects on the power of the French passport in a situation that could have gotten him in trouble without it:

> Especially with a French ID, or a German one, it gives you power. When they see your ID, it's weird, maybe because we are part of the NATO, they were scared of the French ID and they let me and the boy get on the bus again. (Serhat, 27[12])

Both Serhat's and Sirwan's experiences show how the legal and political boundaries inscribed to one's citizenship resonate in the meanings bestowed to citizenship. Such meanings attached to citizenship, particularly in the case of politically sensitive activities, are shaped by the power

relations inherent in the transnational, diasporic space. Being identified as 'Kurdish' in the public space while holding a Turkish and/or French citizenship reveals how interviewees navigate their positionings in the transnational, social terrain of power and how, in turn, it affects the values they attach to their citizenship status.

Besides providing 'protection', the French citizenship status was mostly underpinned by the civic notion of belonging to the nation. Most interviewees were quite explicit in narrating the difference between the French and Kurdish identities for them. French citizenship was most often considered evidence of civic belonging to France, as exemplified by Bengîn's account:

> When people ask me, I say that I'm Kurdish. I never say that I'm French because for me being French means the nationality, not the origins. And when you are asked 'who you are', it's the origins that are being asked, not the nationality. (Bengîn, 23)

Whereas most interviewees identified themselves as Kurdish or French-Kurdish (*franco-kurde*), their narratives of identity showcased the complexity between mere ethnic or civic identifications. Erdem narrated on his transnational political activism between Kurdistan and France in the following manner:

> I feel that I'm in-between France and Kurdistan. I feel as French as Kurdish, but considering the painful situation in Kurdistan, I invest more for Kurdistan, because France has been a stable country for the past three hundred years. Kurdistan is still poor, but the French-Kurdish friendship is a thing, and I would like to develop this relationship. (Erdem, 30)

The reason to be politically active was the result of having been raised, not only in a transnational space but also in diasporic space (Alinia 2004). The continuing position of Kurds as an oppressed minority in the Middle East and Turkey contributed to the motivation to engage politically. This shows the overlapping of the transnational and diasporic spaces in which the interviewees were embedded and how that is reflected in their narratives of identity and citizenship. Citizenship was not solely based on civic or ethnic premises, but also on a sense of diasporic identity. This echoed the fact that 'Kurdish citizenship' does not exist to this date due to the state of statelessness of the Kurdish people. The lack of status for Kurds was a major motivator for transnational political action. To summarize, the interviewees held Turkish, French or both citizenships, yet they identified themselves as French citizens of their civic belonging, and Kurdish by their ethnic and diasporic belonging. Their accounts reflect their lived realities and highlight the complexity of different spatialities that shape the meanings they attach to citizenship.

Case study in Germany

Political practices through de-territorialisation of citizenship

Kurds in Germany belong to different age groups due to the diverse waves of Kurdish migration from Turkey, arriving first as guest workers in the 1960s and then as political refugees from the 1970s onward. However, despite some nuances, migrants' descendants showed similar patterns in their political activities as they all expressed interest in their parents' homeland. The modalities of political activities among Kurdish migrants'

descendants in Germany were primarily shaped in parallel and in reaction to what was happening in the Kurdistan region, particularly in Turkish Kurdistan. Although the political activities the interviewees engaged in to promote pro-Kurdish politics varied greatly, during the last decade three forms of highly intermingled activities independent of the citizenship status were discernible: (1) membership in local Kurdish cultural associations, (2) activism in German political parties and (3) remote, pro-Kurdish political partisanship during the Turkish elections. All three underlined the de-territorialisation of citizenship practices.

Being a member of local Kurdish cultural associations was the most common form of political engagement activity among the interviewees in Germany, which has its parallels to the French case as both are localised forms of activity with a clear diasporic and transnational dimension. The Kurdish associations in Germany started with the Kurdish Workers' Association (*Yekitîya Komalên Kurd li Elmanya*, KOMKAR) in 1979 (van Bruinessen 2000). Today, there are numerous Kurdish organisations (varying from women organisations, student organisations, lawyers' associations, youth organisations, academics network to hometown organisations) in Germany. Out of 26 interviewees, 2 were active attendees of local KOMKAR branches, 21 were engaged in the local chapters of the Confederation of Kurdistan Societies in Germany (*Konföderation der Gesellschaften Mesopotamiens in Deutschland*, KON-MED, previously known as, the Democratic Social Center of the Kurds in Germany, NAV-DEM), and 3 were not engaged attendees of any Kurdish association. Yet, those three interviewees stated that they took part in rallies and protests organised by the mentioned Kurdish associations. Despite variations in their main aims, these associations all promote Kurdish communities in the diaspora and back in Kurdistan in several ways. They also provide socialising spaces for their members and spaces for identity construction, as discussed later.

The second most common way of promoting Kurdish politics was taking part in German political parties. The Kurdish issue is not a new topic for the German political parties as such. The Left Party (*die Linke*), Alliance 90/The Greens (*Bündnis 90/Die Grünen* or *Grüne*) and the Social Democratic Party of Germany (*Sozialdemokratische Partei Deutschlands*, SPD) update and keep the Kurdish issue on their agenda following the events in Kurdistan (Linke 2020; SPD 2021; Bündnis 90/Die Grünen 2024). This is mainly due to the active participation of Kurds who descend from the Kurdish migrants arriving in the 1980s and 1990s, both in political parties at the state level, and in city and district councils. Particularly, the far-left party, the Left Party, offers a highly critical political platform that attracts Kurdish migrants descendants to raise awareness about the Kurdish issue in and outside of Kurdistan. When current German Bundestag of 2021 is considered, four MPs (of those 14 with Turkey-origin) are self-described Kurds who also belong to the descendants' of migrants.[13] Three of these MPs belong to the Left Party and are the children of politically active refugee parents, passionate advocates of the Kurdish problems both within the German Bundestag and outside of the parliament against the regional governments and Germany's position on the Kurd-related issues. Sevim Dağdelen, one of the most vocal Kurdish MPs in Bundestag, has launched several debates against Germany's foreign policy in the parliament regarding the Turkish military attack on the Kurdish city Afrin (Fraktion Die Linke im Bundestag 2018). Gökay Akbulut, another Kurdish politician and an MP of the Left Party, has been highly involved in Kurdish associations throughout her political career. Similar to some other

interviewees, she was also a member of German political parties at the regional and local levels before becoming an MP (Akbulut 2024).

The third form of political engagement is becoming remote pro-Kurdish political party partisans during the Turkish elections (Yener-Roderburg 2022). As of 2012, the Turkish citizens abroad were given the right to vote remotely for the presidential and legislative elections and referenda. This created new possibilities for Kurds in Germany, where the largest Kurdish diaspora reside, to make a political impact in the Turkish elections (Dag, Craven, and Adamson 2021). During the legislative elections of Turkey in June and November 2015, June 2018 and in 2023, the local Kurdish cultural associations were actively involved in mobilising the Kurdish community for the pro-Kurdish Peoples' Democratic Party (*Halkların Demokratik Partisi*, HDP) and Green Left Party (*Yeşil Sol Parti*, YSP)[14] (Yener-Roderburg 2024). The HDP received second most votes in Germany in the first two legislative elections in 2015 after the Justice and Development Party (*Adalet ve Kalkınma Partisi*, AKP) (Yener-Roderburg 2020). Without belonging to any electoral coalition, the HDP managed to receive the third most votes abroad in the 2018 election (Umpierrez de Reguero, Yener-Roderburg, and Cartagena 2021). All interviewees stated that they were involved in the party mobilisation as remote partisans – independent of their citizenship status. Aynur, a member of NAV-DEM/KON-MED, who was formerly a Turkish citizen and later became a naturalised German citizen, stated that the local Kurdish cultural centres affiliated with NAV-DEM/KON-MED turned into HDP/YSP election coordination centres throughout the Turkish electoral periods. She underlined the efforts put into mobilising the Kurdish community:

> We [members of the Kurdish cultural centres] arranged various groups of Kurdish partisans with different Kurdish dialects in order not to disregard any language sensitivity of any Kurdish person with Turkish nationality and knocked door to door. We informed the Kurdish community on Turkish elections. We enrolled many Turkish citizen Kurds in the electoral roll as they needed to be enrolled to be able to be eligible voters for the Turkish elections. (Aynur, 45)

As these accounts indicate, non-citizenship alone does not prevent the interviewees in Germany from engaging in political activities for the Kurdish cause. In order to be part of the electoral process of Turkey as the non-voters, they used non-electoral ways to be politically active. Therefore, unlike the French case it is not possible to draw a generational divide in political activities among Kurds in Germany. However, it is observed that the engagement of Kurds in Germany went beyond engaging with local politicians, as seen in France, to raise awareness of the Kurdish issues. Kurds in Germany have mobilized not only for their own rights but also for their parents' homeland.

Practising German citizenship for the parents' homeland

As noted earlier, the Nationality Act of Germany as of June 2024 on allows non-EU and non-Swiss nationals to hold dual citizenship. This situation beforehand made dual citizenship an impossibility for the Kurds, who either fled or came to Germany from the Kurdistan region, which is divided between four other countries. Considering the attachment of Kurds to their homeland, *Kurdistan*, Kurdish

migrants who we interviewed prefer to become German citizens rather than to remain nationals of countries where Kurds have faced oppression (Yener-Roderburg 2022), in alignment with other relevant findings (Deutscher 2011).

The interviewees and Kurdish political figures mentioned earlier maintain strong attachment to their parents' homeland, using their German citizenship to promote Kurdish politics in Germany when possible. Out of 26 respondents, 14 had German citizenship, while 9 had dual citizenship and 3 had only Turkish citizenship. The German citizenship holders when promoting Kurdish politics did not necessarily underline their 'Germanness' regarding their citizenship even though they called themselves mostly 'German Kurds'. Instead, they expressed the necessity of using this 'free' space as citizens of an established democratic 'Western' country to put forward the human rights violations carried against Kurds in Kurdistan (Casier 2011a). Helin Evrim Sommer, another Kurdish MP from the Left Party, is known with her pro-Kurdish stand in Bundestag. In a public rally organised in Berlin against the Turkish military invasion of Kurdistan, she stated that 'the Kurds who live in the West, should be fighting for the rights of the Kurds in Kurdistan' (Privat 2017). Metin, a naturalised German citizen echoed her sentiments, expressing similar views on this matter:

> I left my Turkish citizenship happily years ago. But once this remote voting came to the scene, I had a heartache that lasted a night because I thought I am useless for my [Kurdish] community. In the morning, I went to the Kurdish cultural centre in my city and talked to the other *hevals (friends)*. Then I decided to use some of my annual leave and be one of the many drivers since I have a car to pick up people in my election region and drive them to the designated Turkish election polling stations. This is the least I can do for my homeland. (Metin, 47)

Metin's statement here underlines that migrants' descendants, who are naturalised in Germany utilise various non-electoral ways of political participation to promote what they believe will improve their parents' homeland. Another interviewee has also mentioned that he worked at the information stand of HDP/YSP which was set in front of a Cologne train station during the Turkish electoral period. The meaning of non-electoral participation in the traditional understanding belongs to the community with voting eligibility (see Vráblíková 2014). However, as the empirical findings underlined, the transnational political activism in the case of interviewees recalibrates the meaning of non-electoral participation and extends it to the ones who are ineligible for vote casting, in other words 'non-voter partisans' (Yener-Roderburg 2022). Kastoryano (2005, 694) describes how migrants in Germany, who wish to maintain their origin country's citizenship, engage in 'compensatory strategies', for instance participating through the civil society 'as a way to assert a collective presence affecting public opinion and political decisions on their behalf'. This is also the case with migrants' descendants, who are not Turkish citizens, although reversely so: they do not have the opportunity to engage electorally in the political sphere in Turkey, so they engage in compensatory strategies enabled by the diasporic space.[15]

Furthermore, the spaces for political participation provided means to construct identity, reducing the feeling of citizenship merely to legal definitions as shown by German citizen Derya's account:

> The Kurdish Women's organisation is my home; while I was a child, I did not know why I never could fit anywhere else even among my Turkey originating peers in Germany. My aunt was coming here [the Women's organisations], and at one point, she started taking me here with her. I discovered my identity here, and I figured out why I have never felt suited among the Turkish speaking children before. I finally felt useful for my [Kurdish] community. Now this place is my home. I am part of almost everything, i.e. charity events, protests that this place is hosting. (Derya, 37)

The spatialities aspect also matters, as the findings show that not having Turkish citizenship did not prevent interviewees who were German citizens to take part in political activities, through non-electoral ways via the transnational diasporic space. In other words, interviewees who were non-voters do not feel that it is necessary to have Turkish citizenship in order to participate in transnational political activities when it is in their parents' homeland. In fact, here, political practices are grounded in citizenship notions that stem from multiple connections including beyond the origin country. In the German case, it appears that as migrants' descendants with German citizenship are prone to use their nationality status *also* to promote the Kurdish cause, particularly in relation to Turkish Kurdistan. The Kurdish MPs in the German Bundestag are the foremost examples on that point, which underlines Ehrkamp and Leitner's (2013) approach, as mentioned earlier, on how immigrants practice citizenship in negotiating for their transnational political interest in their residence countries besides Germany. Being raised in a politically aware environment, as McDowall (1997, 457) states concerning the descendants of Kurdish migrants, the demand to 'discover "who I am" led to a significant surge of interest in political and linguistic identity' that translated into choosing the German citizenship over the Turkish one. This was then strategically used in the political stage in Germany.

Transnational citizenship – comparative notes

What political activities did Kurdish migrants' descendants participate in? In both country cases, political activities included political demonstrations (street activism), organisational activities such as being part of pro-Kurdish Turkey-based party campaigning during the Turkish elections as non-voter partisans, fundraising for diaspora organisations and humanitarian aid to Kurdistan, various awareness-raising activities, and online activism. The activism in France and Germany was also directed to local policymakers, for instance, through lobbying efforts and, in the German case, through active involvement in political parties and coalitions. Also, political activism in both countries was targeted at making a change in Kurdistan, and it was clearly connected to having been raised not only in transnational space but, namely, in transnational diasporic space. Both case studies support previous observations on how the transnational diasporic space shapes the politization of Kurdish migrants' descendants into their parents' homeland affairs, involves them in political activities from a young age, familiarises them with the past and present political conflict dynamics and events in the ancestral 'homeland' and

shapes their identity construction (see Baser 2015; Toivanen 2021). This might be a different case for non-ethno-national diaspora groups and for migrant groups that are not in a minority position in the country of origin.

How did the interviewees narrate on their identities and citizenship? The interviewees in both cases identified themselves *ethnically* as Kurdish, which was also a major reason to engage in transnational political activism. More generally, they also referred to themselves as French-Kurds and German-Kurds. In France, the interviewees viewed French citizenship through the civic understanding of belonging and as something that protected them when engaging in political activities vis-à-vis Turkey. Similarly, in the German case, the interviewees were prone to make use of their German citizenship to vocalize the hardships at their parents' 'home' known to the German political scene. In fact, in both cases, citizenship of an EU country carried considerable weight and enabled their transnational political activism towards their parents' homeland, regardless of whether dual nationality was a possibility or not. In both cases, French and German citizenship was also of strategic and instrumental value to engage in political activities, including those that were criminalised in Turkey. Additionally, in both cases, the Turkish citizenship did not evoke any attachment to the country, but it was rather perceived as a matter of practicality (when not a reminder of the state's oppression) that enabled them to engage in the political sphere of the country, for instance, through extra-territorial voting.

What spatialities shape migrant descendants' political practices, narratives of identity and meanings attached to citizenship? Beyond national citizenship regimes, the supranational, EU citizenship regime was surprisingly of value in granting greater political freedoms to engage in the political sphere of Turkey. The national space was significant in other ways. The German case differed from the French case concerning citizenship acquisition policies and the enactment of dual citizenship. The restrictive nature of the German citizenship law obliged the former Turkish citizens to choose only one citizenship. However, when choosing the German citizenship, the means to engage in direct electoral political participation became limited. The transnational diasporic space offered alternative, compensatory strategies to engage in in-direct electoral activities. When eligible, all migrants' descendants in the German case intentionally preferred to hold the German citizenship due to their sensitive political status and did not want to have ties with Turkish authorities. In France, where dual nationality was a possibility, this question did not come up as strongly. In both cases, the transnational diasporic space played a significant role in shaping identity construction, but it also affected the means for political activism. Whereas Bauböck (2007, 2395) observes that transnational citizenship can be approached as 'a partial overlapping of political communities between states whose territorial jurisdictions are entirely separate', we further posit that such an overlap can take place between the (trans/supra)national, diasporic and local spaces that consequently shape migrant descendants' political practices and the meanings they attach to citizenship.

Conclusion

In this paper, we examined how Kurdish migrants' descendants in France and Germany engage in political practices and how they relate to their narratives of identity and

citizenship. We approached their political practices as an empirical entry point to understand the meanings they attach to citizenship. The findings show that the formal and practical/instrumental aspects of citizenship intersect with the emotional and affective aspects of citizenship that in turn are grounded in feelings of multilocal belonging, collective (diasporic) memories, national notions and regimes of citizenship and lived experiences in the transnational social space (see Papazian and Öztürk 2023). Based on the analysis, we theorise that *transnational citizenship* for migrants' descendants comprises a set of relationships, networks and communications, informed by multiple identities and connections and experienced through everyday formal and informal practices, materials and emotions. Such relationships, networks, communications, identities and connections are situated in diverse social spaces (trans/national, diasporic, (supra)national and local) that shape migrant descendants' political practices and meanings they attach to citizenship. Namely, migrant descendants' political practices are shaped by nation-state level structural factors, including both the resident and 'home' countries' citizenship policies, national(ist) and civic notions of citizenship and belonging but also tied to local civil society institutions and diaspora organisations in the transnational space. The supranational citizenship regime is also bestowed with instrumental and strategic value since it shapes migrant descendants' political practices and at times enables activities that might even be criminalised in their parents' home country. Future studies should continue to move the focus beyond citizenship as a territorially based formal status to include the emotional and affective aspects of migrant descendants' citizenship that are informed by multiple spatialities. This study highlights the need for such a focus and the value of approaching migrant descendants as transnational citizens in their own right.

Notes

1. Both authors have contributed equally to the completion of this article.
2. We have opted to use the term 'migrants' descendants', to refer to Kurdish migrants' children in this study. In previous research, the term 'second generation' is widely used (Levitt 2009), although it has been recently more criticized (Riniolo and Toivanen 2023).
3. The citation is from a Kurdish attendee in the funeral organised for three killed Kurds in Paris in January 2023. Paris witnessed a deadly attack on the Kurdish community, killing three people and leaving another three injured. This revived the previous trauma as this attack came almost 10 years after the assassination of three Kurdish women's movement activists in Paris, a case that remains unresolved to this day. Thousands of Kurds from across Europe travelled to Paris for the funeral (France24 2023).
4. Regardless of originating from same migration movements, diaspora communities are not the exact replica in different national contexts where they settle (Baser 2015). This is also the case of the Kurdish diaspora communities, as exemplified by our respective studies.
5. In August 2023, Federal Cabinet of Germany passed a draft legislation to ease the citizenship law, which would let the law to be similar to the French one such as allowing non-EU citizens, including Turkish citizens to hold dual citizenship, and acquiring German citizenship through 'right of soil'. The law took effect in late June 2024 (DW 2024).
6. https://www.legifrance.gouv.fr/loda/id/JORFTEXT000000684539/#LEGIARTI000006283718
7. See endnote IV.
8. 'Despite legal reforms and a growing public discourse of ethnic diversity, as late as 2008 Kurdish-language instruction was still not permitted in universities or public schools. Only

in early 2009 were a few select universities told they could begin for the first time to teach Kurdish literature or history' (Watts 2010, XIV). However, in recent years, it has been observed that the heads of the Kurdish literature and history departments at the universities are being replaced with non-Kurdish speaking people; additionally, theses written in the Kurdish language at such departments are not being permitted anymore (Gazete 2020).

9. McFadden (2019) draws attention to the complaints of the blue card holders as a result of the bureaucratic hardships of making use of the card as it has been assured.
10. The institutions where we completed these projects did not require passing an ethics review.
11. By 'good positions' and 'dangerous' ones, Rebin refers to the border region that Turkey shares with Syria and Iraq, where guerrilla activities are higher. The Turkish military can also be avoided by paying a certain monetary compensation to the state.
12. There are several cases where the French and German citizenship holders have been detained in Turkey or not been allowed to enter due to their oppositional online activities. See, for instance, the case of Adil Demirci, who holds a dual citizenship (DW 2018).
13. Canan Bayram is an MP from the Alliance '90/The Greens, and Evrim Sommer, Gökay Akbulut and Sevim Dağdelen are from the Left Party.
14. In the June 2023 elections, the HDP ran under banner of the Green Left Party (YSP) due to risk of closure. In October 2023, YSP first has become the Peoples' Equality and Democracy Party (*Halkların Eşitlik ve Demokrasi Partisi*, previously known as HEDEP, now DEM Party (BBC Türkçe 2023).
15. As Kyei, Koomson-Yalley, and Dwumah (2020) show in their work, similar to the case of Kurds in Germany without Turkish citizenship, Dutch citizens of Ghanaian origin living in Amsterdam, who cannot participate in Ghanaian elections as voters, are politically active from the Netherlands for Ghanaian political parties.

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