

## **Citizenship in a *de facto* state. The case of Estonians in Abkhazia**

**Aivar Jürgenson\***

### **Abstract**

In the case of *de facto* states, among which the international community includes Abkhazia, the international recognition of these countries is a critical issue. Although they have a permanent population, a defined territory and a functioning government, their ability to engage with other states is limited. Abkhazia is recognized by some countries, but there are few opportunities for communication with the majority of countries in the political, economic, educational and social spheres. For inhabitants of Abkhazia, the lack of international recognition also affects their ability to cross borders and travel – it is not possible to cross borders with a passport of an unrecognized state. This also affects ethnic diasporas living in Abkhazia, whose ability to maintain translocal relations with their homeland has been severely disrupted. This article examines the different citizenship options available to the members of the Estonian diaspora in Abkhazia and the limitations imposed by the country's lack of international recognition. The study examines how legal restrictions hinder the maintenance of ties with the homeland and explores possible ways to overcome these obstacles.

**Keywords:** citizenship laws, border restrictions, ethnic minorities, translocal mobility, multiple citizenship, parent and patron states.

### ***De Facto* Bir Devlette Vatandaşlık. Abhazya'da Estonların Durumu**

#### **Özet**

Uluslararası toplumun Abhazya'yı da dahil ettiği *de facto* devletler söz konusu olduğunda, bu ülkelerin uluslararası alanda tanınması kritik bir konudur. Kalıcı bir nüfusa, tanımlanmış bir bölgeye ve işleyen bir hükümete sahip olmalarına rağmen, diğer devletlerle ilişki kurma yetenekleri

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sınırlıdır. Abhazyza bazı ülkeler tarafından tanınıyor, ancak siyasi, ekonomik, eğitim ve sosyal alanlarda ülkelerin çoğuyla iletişim kurmak için çok az olanağı var. Uluslararası tanınırlığın sınırlı olması, Abhazyza halkının sınır geçme ve seyahat etme özgürlüğünü de etkiliyor. Bu durum Abhazyza'da yaşayan etnik diasporaları da etkilemekte, anavatanlarıyla ilişkilerini sürdürmeleri ciddi şekilde sekteye uğramaktadır. Bu makale, Abhazyza'daki Eston diasporası üyeleri için mevcut olan farklı vatandaşlık seçeneklerini ve ülkenin uluslararası tanınma eksikliğinin getirdiği sınırlamaları incelemektedir. Çalışma, yasal kısıtlamaların anavatan ile bağların sürdürülmesini nasıl engellediğini incelemekte ve bu engelleri aşmanın olası yollarını araştırmaktadır.

**Anahtar Kelimeler:** vatandaşlık, sınır kısıtlamaları, etnik azınlıklar, yerel ötesi hareketlilik, çoklu vatandaşlık, ebeveyn ve hamî devletler.

### Introduction

The war between Georgia and Abkhazia (1992-1993) resulted in Abkhazia's independence from Georgia, which is not recognized by Georgia or the majority of countries in the world. Much of the literature analyzing the situation in Abkhazia focuses on the *de facto* independence of the country, analyzing Abkhazia's international position and the historical and ethnic roots of the Georgian-Abkhazian conflict. The Georgian-Abkhazian conflict has been described in the literature as the „forgotten conflict“ (Hille 201) or „frozen conflict“ (Jahn 301), reflecting the separatist nature of the conflict and the obstacles to its resolution. In fact, this conflict has not been forgotten by political scientists and other researchers interested in the region. Abkhazia has been described as „one of the most interesting cases of *de facto* statehood building in Eurasia“ (Markedonov 71). At the local level, the issue is of course relevant in Abkhazia (Lakoba, *Abhazija-de-fakto; Abhazija posle; History; Achugba, K obosnovaniju; Ètnopoliticheskie; Avidzba*) and Georgia (Nadareishvili; Papaskiri; Gamakharia; Jojua, *Russia*), whose historians see the causes of the conflict in very different ways and primarily in its ethnic roots. For the Abkhazian authors, Abkhazia is an independent state based on the right of peoples to self-determination, for most Georgian authors, Abkhazia is a separatist region of Georgia that must be reunited with Georgia. Sometimes the example of the Abkhazian conflict is used as a precedent for

analyzing one's own problems. In Serbia, for example, the press reported on the crisis in Abkhazia after 2008, when Kosovo broke away from Serbia. In the Serbian media, the events in Abkhazia have been integrated into the context of the events of the war in Yugoslavia. Abkhazia has become "Georgia's Kosovo" (Pierzynska 13).

As a result of the Georgian-Abkhazian conflict in the early 1990s, most of the Georgian population fled Abkhazia, a part of them either stayed or returned to Abkhazia in the following years. In the last decade, the issue of citizenship and cross-border movement has been particularly reflected in relation to ethnic Georgians in Abkhazia, especially those living in the Gal(i) district, located along the border with Georgia, where both sides of the border are mainly populated by the Mingrelians, members of the Georgian sub-ethnic group. The articles (Oltramonti; Lundgren; Venhovens) discuss the vulnerability of the Gal(i) Georgians/Mingrelians in relation to their ethnic background and examine their cross-border living arrangements and border crossings from the Ingur(i) River. In the case of the Mingrelians of the Gal(i) much attention has been paid in the literature to the question of their citizenship. Mingrelians living in Abkhazia can apply for an Abkhazian passport if they renounce their Georgian citizenship, as non-ethnic Abkhazians are not allowed to hold dual citizenship in Abkhazia. In this regard, it has been emphasised that the Abkhazian citizenship law includes preferential treatment for ethnic Abkhazians (Ganohariti).

Because the Gal(i) population makes up a significant proportion of Abkhazia's population, their citizenship issues and Ingur(i) border crossing had received more attention in the literature than other ethnic minorities. Much less discussed has been the issue of crossing the border into Russia via the Psou River, which is legally more complicated: while Georgia allows people to cross the Georgian-Abkhazian border at the Ingur(i) River mainly because it controls that border, crossing the border at the Psou river, which it does not control, has been made a criminal offense. The government of Bidzina Ivanishvili, which took office in 2012, relaxed the penalty (Egorova 118-119), but crossing the Psou border from Russia into Abkhazia is still not tolerated in Georgia. At the same time, the

residents of Northwestern Abkhazia (Gagra district) have used this border point for many years to communicate with the outside world. While the Ingur(i) crossing is mainly used by ethnic Georgians, the Psou crossing is mainly used by Abkhazians, Armenians and the member of other ethnic groups.

Studies on the border crossings of Gal(i) district residents focus on citizenship and human rights issues of ethnic Georgians/Mingrelians, the restrictions on their life in Abkhazia are mainly seen in relation to the discriminatory role of the *de facto* state's citizenship regime. The fact that discrimination also results from the international community's pressure on the residents of the *de facto* state, and that it also affects other minority ethnic groups of the *de facto* state, is highly underestimated and there is little academic debate.

In this article, I would like to add another Abkhazian ethnic minority to the discussion – Estonians, whose ancestors arrived in Abkhazia during the massive agrarian colonization in the 1880s, when four Estonian villages were established: Estonia and Linda (later divided into Upper and Lower Linda) in the Sukhum district, and Salme and Sulevi in the Black Sea district. According to the first all-Russian census in 1897, 604 Estonians lived in Abkhazia. As of 1914, 1,017 Estonians lived in Abkhazia, which made them the sixth largest in number after Abkhazians, Georgians, Greeks, Armenians and Russians. Their number increased later, reaching a peak in 1939, when they were counted at 2,282 (Bagapsh 11, Basarija 45-46). During and after the Georgian-Abkhazian War, almost 500 Estonians left Abkhazia for Estonia. According to the 2011 census, there are 351 Estonians living in Abkhazia, although the number is decreasing due to an aging population of this historical diaspora group.

In diaspora definitions and taxonomies the role of the mother country has usually been emphasized. The ties with the homeland have been seen as critically important (Safran 10). Throughout the decades, Abkhazian Estonians have maintained close ties with their mother country, Estonia. During the Tsarist era, the homeland was serving as a cultural resource for the diaspora. Literature and newspapers were ordered from Estonia, and strong ties were maintained through the Lutheran Church. A cultural rupture with

the homeland occurred with the Bolsheviks' rise to power in Abkhazia but 20 years later, when Estonia was occupied by the Soviet Union, these connections resumed in a translocal form (Wessendorf 13, Hoerder 73), characterized by continuous migration, including back-and-forth movements between Estonia and the home villages in Abkhazia. Many Estonians currently living in Abkhazia have spent part of their lives in Estonia, many have family members in Estonia. While translocal mobility during the Soviet years was practiced within the borders of a single state, the dissolution of the Soviet Union introduced restrictions, as international borders and migration regulations began to limit movement. Despite these constraints, the ability to visit Estonia remains highly important for Abkhazian Estonians.

It will be shown in the article that the main obstacles to border crossings and visits to the homeland stem from Abkhazia's *de facto* status, which has been imposed on it by the international community. Since the ability to cross the border depends on citizenship, the article deals with citizenship issues of Abkhazian Estonians. The article examines the impact of the citizenship laws of Abkhazia, Russia, Georgia and Estonia on the mobility of Estonians in Abkhazia. The following case study shows what kind of real obstacles to border crossing the *de facto* status of Abkhazia poses. The final paragraph analyses the possibilities of Abkhazian Estonians to acquire and actually use Estonian citizenship. It also discusses possible solutions for the translocal mobility of Estonians in Abkhazia.

The article employs various methods. The existing citizenship laws of Abkhazia, Russia, Georgia, and Estonia, as well as their restrictions on multiple citizenship are compared. The study analyzes the legal choices available to Abkhazian Estonians regarding different citizenship options. Information on how these restrictions hinder mobility has been gathered through numerous ethnological fieldworks that I carried out in Abkhazia (1997–2019), during which interviews were conducted with local Estonians. In the final paragraph, which examines the citizenship policy of the Republic of Estonia (1918–1940) and its impact on Abkhazian Estonians, written archival sources from Estonian archives and relevant articles published in Estonian press before World War II have been analyzed.



The Map of Abkhazia with Estonian villages

### ***De facto* states and citizenship.**

*De facto* states are territories that have achieved de facto independence but have failed to achieve (widespread) international recognition (Caspersen 11). The lack of recognition can be considered critical for these entities, which is why the term 'unrecognized states' has also been used in parallel (Berg, Riegl, Doboš 2; Fabri 25). International recognition plays an important role in the political, security, legal, economic and socio-cultural development of states, providing them with protection under international law, access to multilateral bodies and the opportunity to develop diplomatic and trade relations with other states (Visoka 134). Dov Lynch points out that because the *de facto* state is not recognized by other states or the international community, it has no legal status in the international arena. Lynch emphasizes that in addition to the legal claim, there is also an empirical claim to statehood. According to the Montevideo Convention on the Rights

and Duties of States,<sup>1</sup> the entity must have (1) a permanent population; (2) a defined territory; (3) a government; (4) the capacity to enter into relations with other states. The first three are fulfilled by *de facto* states, the fourth is required (Lynch 834-835). Although *de facto* states have control over their territory and have also implemented political reforms, their international interaction is hindered by a lack of political recognition. Many important doors remain closed, and access depends on the approval of the parent state (Caspersen 14), i.e. an internationally recognised state from which a *de facto* state has seceded. One practical indication of the position of *de facto* states in the international system is the question of citizenship.

According to international law, only sovereign states can confer citizenship. The lack of recognition of *de facto* states ends with the non-recognition of the citizenship granted to its inhabitants by that state. Depending on the constellation of citizenship, the residents of these entities are either considered as stateless persons or the citizenship of their parent state is recognized internationally, even if they refuse to accept its authority. But there is also the possibility that the residents of a *de facto* state will apply for the citizenship of a third, recognized country. This may mean that they have *de facto* dual citizenship within the country (Ganohariti 177f.). In the case of a third country, we can speak of a patron state, i.e. a state that provides security guarantees and political and economic support to help the *de facto* state maintain the status quo. Since the *de facto* state does not have widespread international recognition, the international community does not have to recognise its citizenship nor the citizenship of its patron state. For residents of a *de facto* state, the non-recognition of their citizenship can lead to a discriminatory situation: the use of the citizenship of the parent state limits their electoral opportunities, while the use of the citizenship of the *de facto* or patron state limits international communication, including the crossing of borders.

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<sup>1</sup> The Montevideo Convention on the Rights and Duties of States was signed in Montevideo on 26 December 1933 by 19 states and entered into force on 26 December 1934.

As for Abkhazia, its sovereignty has been recognized by Russia as its parent state (2008), as well as Nicaragua (2008), Nauru (2008), Venezuela (2009) and Syria (2018). Vanuatu (2011) and Tuvalu (2011) subsequently withdrew their recognition. Some Abkhazian authors argue that with the recognition of some UN member states, Abkhazia has fulfilled the conditions of the Montevideo Convention and is an internationally legitimized state (Chirikba 7f.; Vozba 123). Some others are more modest, noting that although Abkhazia has been recognized by some countries, it is still problematic to speak of it as an independent subject of regional politics (Ėšba 204). International law does not specify how many countries must recognize a state in order for it to be considered internationally recognised, which is why it is sometimes concluded that Abkhazia is a *de jure* state, while many countries and international organisations still speak of Georgia's territorial integrity in relation to Abkhazia (Hille 198). However, political scientist Céline Francis argues that although recognition by Russia and others changed Abkhazia's status in relation to these countries, it still remained a *de facto* state. Recognition by a handful of countries does not mean full recognition (Francis 23). Nina Caspersen and Gareth Stansfield have treated Abkhazia as 'partially recognized state', because it has been recognized by its patron state Russia and some other countries (Caspersen, Stansfield 3).

Non-recognition has not been treated as a permanent status for *de facto* states. Internally, *de facto* status is treated as a necessary step towards recognition; externally, it is often seen as a temporary anomaly before the territorial integrity of the parent state is restored (Caspersen, Stansfield 5). Abkhazia's parent state, Georgia, still considers Abkhazia to be its own territory. History books and articles published in Georgia deny the independence of Abkhazia, and refer to Abkhazia sometimes as Northwest Georgia (Arveladze, Mibchuan 96; Jojua, *Russia* 76), the attributes and symbols of the Abkhazian state such as the country and its borders, the president, the parliamentary elections, the referendum on independence, etc. are put in quotation marks to demonstrate a denial attitude (Jojua, *Abkhazia* 480, 484; *Russia* 76). It is important to note that Estonia, as the motherland of the Abkhazian Estonians, has officially



supported Georgia's territorial integrity since the 1990s, considering Abkhazia a separatist region of Georgia. During the presidency of Mikheil Saakashvili (2004–2013), as Georgia's pro-Western orientation deepened and relations with Russia deteriorated, Georgia-Estonia alliance relations strengthened. Although in the 1990s, there were also political actors in Estonia who supported the Abkhazians' aspirations for independence (Jürgenson 36-37), Estonia's official stance has remained indifferent to this issue to this day. Although Estonian politicians have acknowledged Abkhazian Estonians for example on village anniversaries (Piirsalu, *Reinsalu...* 3), this primarily reflects a cultural rather than a political connection between the homeland and the diaspora. The Estonian state does not recognize Abkhazian passports, which hinders Abkhazian Estonians from maintaining physical contacts with their homeland. The following section examines the possible travel documents available to Abkhazian Estonians and how the international recognition of these documents is related to the partial recognition of Abkhazia.

### **Estonians of Abkhazia between the citizenship laws of Abkhazia, Russia, Georgia and Estonia.**

#### *Citizenship of the Republic of Abkhazia*

The first law on citizenship of the Republic of Abkhazia was adopted in 1993. Currently, there is a 2005 citizenship law (Zakon...), which contains elements of both the *jus sanguinis* and *jus soli* principles. Article 5-a of the law is based on the principle of *jus sanguinis*, according to which ethnic Abkhazians receive Abkhazian citizenship regardless of their place of residence or other citizenship. This article also allows ethnic Abkhazians, unlike others, to hold dual citizenship, which is prohibited under Article 6 of the Citizenship Law. Article 5-b of the law is based on the principle of *jus soli*, according to which persons who have been permanent residents of Abkhazia for at least five years prior to October 12, 1999, when the Act of State Independence of the Republic of Abkhazia was adopted, are considered to be citizens of Abkhazia, unless they have renounced their citizenship of Abkhazia in writing. Therefore, the Abkhazian law of citizenship, in force since 2005 does

not allow dual citizenship for non-ethnic Abkhazians, including Estonians. Dual citizenship is allowed if the second citizenship is that of the Russian Federation, as Abkhazia and Russia have signed an agreement to this. While the 1993 citizenship law allowed a person to hold both Abkhazian and Georgian citizenship, the new law does not allow this (Ganohariti 181). In theory, this is only possible for ethnic Abkhazians under Article 5-a of the law. Local Estonians do not have this option.<sup>2</sup> An Abkhazian passport is available to practically all Estonians from Abkhazia, but it does not allow them travel to Estonia, for example, which has not recognized Abkhazia *de jure*. The Estonians there have to find other ways to get to Estonia.

#### *Citizenship of the Russian Federation*

The majority of Estonians in Abkhazia in addition to an Abkhazian passport nowadays hold a Russian one. Until 2002, the Russian government allowed residents of Abkhazia (and South Ossetia) to apply for Russian citizenship in a simplified process. This passportization<sup>3</sup> was justified by Russia on humanitarian grounds, since all international attempts to bring the people of Abkhazia and South Ossetia out of their isolation (so-called Nansen passports, UN travel documents like in Kosovo before its international recognition) had failed because of Georgia's resistance. Russia relied on the legislation of the Russian Federation, which allowed stateless persons living in the territories of the former Soviet Union to apply for the citizenship of the Russian Federation in a simplified procedure. The new law on citizenship of the Russian Federation, which came into force in 2003, made it more difficult to obtain Russian citizenship, which is why in 2002 people in Abkhazia and South Ossetia, for example, began to rush to obtain Russian

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<sup>2</sup> It is an open secret that a great number of Mingrelians living in Abkhazia actually hold both Abkhazian and Georgian passports.

<sup>3</sup> Passportization refers to the mass distribution of passports by a state to people, often in a foreign or disputed territory, to extend its influence. It is commonly associated with Russia's policy of granting Russian passports to residents of Abkhazia, South Ossetia, Transnistria, and Donbas.

passports. The government of Abkhazia also encouraged the acquisition of Russian citizenship, which was seen as a guarantee of security in the event of a military attack by Georgia. The mass issuance of Russian foreign passports began in June 2002, when about 8,000 residents of Abkhazia received Russian passports every day. By January 2003 the number of Russian passport holders in Abkhazia rose to 80% (Littlefield 1472; Manutscharjan 142; Mühlfried 9; Nagashima 188). Passportization has been described as a tool by Moscow to strengthen its influence in Abkhazia and gain an opportunity for military intervention (Souleimanov et al. 80).

When Russia recognized the independence of Abkhazia in August 2008, the possibility of obtaining Russian passports disappeared, but by then the majority of the inhabitants of Abkhazia had already acquired Russian passports (Jahn 302), including local Estonians. As a travel document, the Russian foreign passport was of practical value to the people of Abkhazia, as the Abkhazian passport is not recognized by most countries of the world. Russian citizenship also guaranteed access to the benefits offered by the Russian social system. It is also important to note that according to Russian law, holding a foreign passport of the Russian Federation alone does not guarantee access to the benefits offered by the Russian social system (an internal passport and registration in the Russian Federation are also required). In Abkhazia and South Ossetia, however, the Russian authorities have made an exception, which is why, for example, holders of Russian foreign passports also receive a pension in Abkhazia, which, by the way, is higher than in Abkhazia, but also higher than, for example, the pension in Georgia. A Russian passport also gives residents of Abkhazia access to the Russian health and education systems (Askin 194). Access to the Russian social system in Abkhazia and South Ossetia does not entail general obligations such as military service (Mühlfried 9). In previous years, the Russian passport has helped Estonians from Abkhazia to visit Estonia, which is also very important for them. However, after Georgia in 2008 adopted „The Law of Georgia on Occupied Territories“, European consular services, including Estonia's, have required not only a Russian foreign passport, but also a Russian domestic passport with registration marks in the

Russian Federation. Residents of Abkhazia, however, do not have Russian internal passports. Citizens of Abkhazia have begun to apply for them, but the consulates of Estonia and other Baltic states and Poland in Moscow required proof of work in Russia (Lomia 153). Estonians from Abkhazia with a Russian passports could therefore no longer get a visa in their passports to enter Estonia.

*Citizenship of the Republic of Georgia.*

In 1993, the Georgian authorities gave Abkhaz residents six months to renounce their Georgian citizenship. If this was not done, the persons were registered as citizens of the Republic of Georgia (Lohr 187; Askin 186). After the end of the war in 1993, the Georgian authorities had no prospects for widely informing the Abkhazian population of this possibility and of collecting applications. Some studies suggest that the Abkhazian authorities also created obstacles to the distribution of Georgian passports in Abkhazia after the end of the war (Mühlfried 9), but even without these obstacles, Georgian citizenship would not have been popular in Abkhazia, considering the war against Abkhazia that had just ended. Florian Mühlfried writes that Georgia's claim that the residents of Abkhazia (and South Ossetia) are *de jure* Georgian citizens is threatening to most of the local population (Mühlfried 10). The same Georgian claim was one of the motivations behind the introduction of Russian passports in Abkhazia: for Abkhazian residents the Russian passport symbolizes non-participation in Georgia. This should not automatically be seen as the desire of Abkhazians to join Russia – according to recent polls, more than 60% of Abkhazians do not want to join (Ganohariti 184). Taking Russian passports can therefore be seen as both a symbolic and a pragmatic step. However, the Estonian state treats Abkhazia as part of Georgia and assumes that Estonians in Abkhazia have Georgian citizenship. For example, when an Estonian married couple moved from the village of Salme to Estonia in 2001, they were required to have Georgian passports. The people from Abkhazia, of course, didn't have them (Kaukvere, *Kuidas* 9).

The Estonian authorities have offered Estonians from Abkhazia the opportunity to apply for Georgian passports and obtain visas from the Estonian Embassy in Tbilisi to visit Estonia. But it is not as easy as

the Estonian authorities seem to imagine. Because of the icy relations between Abkhazia and Georgia, travelling from Abkhazia to Georgia and back can cast a bad shadow on local residents. According to one of my informants, an Estonian woman living in Sukhum: "...in order to go to Estonia, we have to go to Georgia, so that Georgia [the Estonian embassy] will then make these papers for us. And how do we get to Georgia? When we go to Georgia, the Abkhazians kick us out – why did you go to Georgia? And what should we do now?" The informant is clearly exaggerating the problem: the Abkhaz side does not kick out the people from Abkhazia solely for visiting Georgia. The informant knows this at least because one of her relatives has repeatedly traveled from Abkhazia to Georgia. However, in general, Abkhazian Estonians still fear traveling to Georgia, as they are afraid of disapproval from the Abkhaz authorities.

The Estonian authorities have been unable to take this human aspect into account. Just as Estonian officials do not recognize the Abkhazian citizenship of Estonians in Abkhazia and recommend to obtain a Georgian passport, they have also refused to recognize other documents issued in Abkhazia. For example, the Estonian ENIC/NARIC (Academic Recognition Information Center) has refused to recognize the high school diploma issued to an Estonian from Abkhazia on the grounds that Estonia does not recognize the state of Abkhazia and the educational documents issued there. In order to resolve the situation, it is recommended to contact the Ministry of Education of Georgia or the Ministry of Education of the Autonomous Republic of Abkhazia operating in Georgia to obtain recognition of the document (Piirsalu, *Abhaasia* 7). This also requires travelling to Georgia, which Abkhazian Estonians generally avoid. An Estonian repatriated from Abkhazia to Estonia writes in her memoirs: "It is as if the law of life that the stronger must always subjugate the weaker. Abkhazia was also my place of birth in the documents. The last time I changed my ID card in Pärnu [city in Estonia – A.J.] in 2012, I got a call from the migration office and asked: "Can we put Georgia as your place of birth?" The answer to my *why*-question was that such a country as Abkhazia does not even exist on the world map." (Madison 62). The Estonian authorities and some politicians refer to the Estonians of Abkhazia as 'Georgian Estonians'. As I have repeatedly

heard from my Estonian interview partners in Abkhazia, they consider such an expression provocative. They are loyal to the Abkhazian authorities and do not wish to identify themselves with Georgia.

*Citizenship of the Republic of Estonia.*

In several post-Soviet countries, it has been possible to obtain citizenship on the basis of ethnicity, which also guarantees compatriots living in the diaspora the right not only to return to their homeland, but also to become citizens of the country without difficulty. Such ethnicity clauses have been included in citizenship laws in Lithuania, Hungary, Croatia and Belarus, for example. Armenia also granted citizenship to members of its diaspora. The situation was different in Estonia. In the citizenship policy of the newly independent Estonia, it was decided to follow the restitution model, i.e. the citizenship was defined on the basis of the citizenship of the Republic of Estonia, which was founded in 1918 and occupied by the Soviet Union in 1940. This meant that only those who were citizens of the Republic of Estonia before June 17, 1940, and their descendants were automatically granted citizenship. All other residents were defined as foreigners. Apart from Estonia, of the countries of the former Soviet Union only Latvia used such a model. It is sometimes erroneously stated that Estonia and Latvia granted citizenship only to the titular group they represented (Ganohariti 180). In the ethnic sense, this was not the case, as citizenship was in fact granted to Germans, Russians, Swedes and others who (or whose ancestors) had been citizens of the Republic of Estonia before 1940. At the same time, ethnic Estonians in the diaspora, whose ancestors had left Estonia before the establishment of the Republic of Estonia in 1918, were not automatically entitled to citizenship. The restitution model grants Estonian citizenship to those members of the Estonian diaspora who or whose ancestors left Estonia as Estonian citizens (for example, those who fled to Sweden, Germany, the USA, etc. in the 1940s). Estonians emigrated to the Caucasus, Siberia or Inner Russia in the second half of the 19th century and the first decade of the 20th century and did not automatically receive Estonian citizenship.

If a non-citizen Estonian wishes to become a citizen and does not have the birthright to do so, citizenship must be applied for through naturalization. For example, Estonians who were evacuated from

Abkhazia in 1992 because of the Georgian-Abkhazian war also received Estonian citizenship through naturalization in 1993 (Mihelson 6). On the basis of the citizenship law in force until March 31, 1995, all ethnic Estonians, i.e. those whose nationality was listed as 'Estonian' in documents (e.g. in a Soviet passport), could still apply for Estonian citizenship in a simplified procedure, i.e. without exams and without the requirement of a long-term residence permit (Kaukvere, *Eestlane* 6). Such an inclusive diaspora policy generally met the needs of Estonians in the diaspora. But then the situation changed on April 1, 1995, when the new citizenship law came into force – now ethnic Estonians no longer had preferential treatment for obtaining Estonian citizenship. In addition, the duration of the residence permit was extended from two to five years, which now also applied to ethnic Estonians. They were also required to pass a language test and tests on knowledge of the Constitution and the Citizenship Act. However, citizenship by birth has another advantage that citizenship obtained by naturalization does not have. The Citizenship Act stipulates that an Estonian citizen cannot hold the citizenship of another country at the same time. If the citizenship of another country is acquired, the citizenship of Estonia must be renounced. At the same time, the Constitution of the Republic of Estonia states that no one may be deprived of Estonian citizenship acquired by birth. This means that Estonian citizens by birth can have dual citizenship, although the Citizenship Act prohibits dual citizenship. Therefore, Estonians who fled from Estonia to the West in the 1940s can have dual citizenship, but descendants of those who migrated to the Caucasus or Siberia in the 19th century cannot. This concerns tens of thousands of repatriates from Russia and the Caucasus to Estonia during the Soviet period and their descendants. Estonians from Abkhazia living in Estonia are frustrated by the double standards that treat different Estonian diaspora communities differently. They have also expressed their dissatisfaction in the Estonian media (Rutto, Langebraun). Those who practice a translocal lifestyle between Abkhazia and Estonia feel particularly discriminated against. The following case study illustrates the legal and practical problems posed by this difference and the fact that Estonia does not recognize the sovereignty of Abkhazia.

**Table:** Comparison of principles of citizenship and dual citizenship in Abkhazia, Russia, Georgia, and Estonia.

Country	Principles of Citizenship	Dual Citizenship
<b>Abkhazia</b>	Ethnic Abkhazians received citizenship automatically. Non-ethnic Abkhazians qualified automatically if they had been residents for five years before Oct. 12, 1999.	Allowed only for <b>ethnic Abkhazians</b> and only if the second citizenship is <b>Russian</b> . Otherwise, it is prohibited.
<b>Russia</b>	Russian citizenship was granted through <b>passportization</b> until 2003, allowing Abkhazian residents to obtain Russian passports in a simplified procedure.	Dual citizenship is allowed for citizens of Abkhazia. Abkhazian citizenship is recognized.
<b>Georgia</b>	In 1993, residents of Abkhazia were given six months to renounce their Georgian citizenship, otherwise they were registered as Georgian citizens.	As an exception, the dual citizenship is possible, but generally not permitted. Abkhazian citizenship is not recognized.
<b>Estonia</b>	Citizenship follows the <b>restitution model</b> – automatically granted only to the citizens (and their descendants) of the Republic of Estonia (1918-1940). Unlike many post-Soviet states, Estonia did not offer simplified citizenship to diaspora Estonians.	Dual citizenship is not permitted, although it is possible in practice under certain conditions. Abkhazian citizenship is not recognized. The Estonian authorities consider Estonians in Abkhazia to be Georgian citizens.



*Case study from the village of Salme*

The protagonist of the case is a woman whose ancestors moved from Estonia to Abkhazia in the 19th century, where she grew up in the village of Salme. In 1958, i.e. during the Soviet period, she moved to Estonia and worked as a teacher in Tallinn. In 1997, she moved back to Abkhazia to take care for her elderly mother and also to teach Estonian at the Salme village school. It is worth mentioning that Estonian language teaching there is founded by the Estonian state. Estonia's diaspora policy, which is known as the "Compatriots Program", is administered by the Ministry of Education and the Ministry of Culture (Birka, Kļaviņš 118). As part of the program, Estonian language and culture are taught to Estonians in the diaspora in many parts of the world, including in Abkhazia, although Estonia does not recognize this state. At the Salme village school the Ministry of Education pays the teacher's salary and equips the school with Estonian language textbooks and other learning materials. This woman worked at the Salme village school for more than 20 years. Every year she went to Estonia to submit her work report to the Ministry of Education and to meet her relatives – her son and daughter live in Estonia. However, problems suddenly arose during her reporting visit in 2016. Her Estonian passport, which she had obtained through naturalization, was about to expire. In the process of renewing her passport, it turned out that in addition to her Estonian passport, she also had a foreign passport of the Russian Federation – we had previously seen that in Abkhazia it was common to acquire a Russian foreign passport for practical reasons. Since this woman had not acquired Estonian citizenship by birth, and since Estonian legislation does not allow dual citizenship in such a case, she was faced with a choice: either give up her Russian or Estonian citizenship. Forcing her to renounce her Estonian citizenship was not only an emotional blow, but would also have made it difficult reporting to the Estonian Ministry of Education in the future. If she had renounced her Estonian citizenship, as a Russian citizen she would have had to apply for an Estonian visa for every reporting trip to visit Estonia. But there is no Estonian consulate in Abkhazia, which Estonia considers to be occupied Georgian territory. The Estonian authorities also were not in favor

of putting Estonian visas in Russian foreign passports issued in Abkhazia. Therefore, renouncing Estonian citizenship would make it difficult for this woman to work as an Estonian language teacher in Abkhazia. Consequently, she would have to give up her Russian passport. However, this would mean that as an Estonian citizen she would have to apply for a Russian visa to travel to Estonia via Russia. For a citizen of the Republic of Estonia, it is possible to apply for a Russian visa only at the Russian embassy in Estonian capital Tallinn. In the first years, when the woman had only Estonian citizenship, she had to do it this way – send her Estonian passport to the Russian embassy in Tallinn with friends and wait for the opportunity to get the passport back in Abkhazia. But there is another side to the story. The village of Salme is located in Abkhazia on the banks of the Psou River, which forms the border with Russia. Local people go there to shop and sell their garden produce. Renouncing Russian citizenship would also mean significant obstacles in everyday life.

The third option is an Abkhazian foreign passport, which would allow people to cross the Abkhazian-Russian border, as Russia has recognised Abkhazia as a *de jure* independent state since 2008. However, it would not be possible to travel to Estonia with an Abkhazian passport, as for Estonia Abkhazia is an unrecognized state. Although neither Abkhazia nor Estonia allows dual citizenship (with certain exceptions), there are Estonians in Abkhazia who have only Estonian and Abkhazian passports. It is possible to travel through Russia with an Abkhazian passport and show the Estonian passport to Estonian officials at the Estonian border. The fourth option would be Georgian citizenship, which would be accepted by the Estonian side, because the Estonian authorities consider Abkhazia to be officially Georgian territory. However, Abkhazia has *de facto* been an independent country since 1993, and Georgian passports are not issued in Abkhazia. Moreover, as we have seen, Abkhazian legislation prohibits dual citizenship with a few exceptions.

Since many Estonians from Abkhazia who have repatriated to Estonia feel that their legal status in Estonia is unfair, the more active among them have sought ways to obtain the Estonian citizenship by birthright. It is they and not the professional

historians who have discovered in Estonian archives that many ancestors of Estonians in Abkhazia acquired Estonian citizenship through Estonian consulates in the early 1920s. The following historical excursus explores the legal and historical aspects of this possibility.

### **Citizenship of the Republic of Estonia by birth for Estonians from Abkhazia.**

When the Republic of Estonia was established on February 24, 1918, the inhabitants of the former Russian tsarist state from the territories of Estonia were recognized as citizens of the new country, but citizenship rights were not automatically extended to the members of Estonian diaspora at the time of the adoption of the citizenship law – a citizenship certificate and a return permit had to be applied for separately through Estonian consulates (Rohtmets-Aasa 13). As for Estonians from Abkhazia, they had the opportunity to apply for Estonian citizenship through the Estonian consulate in Tiflis (Tbilisi), as Abkhazia was part of the Democratic Republic of Georgia in 1918-1921. Between August 26, 1920 and August 26, 1921, 688 persons were granted Estonian citizenship there and 366 passports were issued to them (including family members). As of August 26, 1921, 129 of them had left for Estonia. However, 387 citizens were still living in Abkhazia (Eesti esitus Kaukaasias 1). In March 1921, the Red Army had conquered Georgia and Abkhazia and established Soviet rule there. Relations of the Republic of Estonia with the Soviet authorities in the Caucasus worsened, and in the spring of 1922 Estonian consul was invited back to Estonia. The Estonian consulate in Tiflis was closed.

What happened to these 387 Estonian citizens remained in Abkhazia? Many were restricted from travelling to Estonia via Soviet Russia, many remained in Abkhazia hoping that the situation would improve after the war and that they would be able to continue their usual life activities.

From the very beginning, the Soviet side saw a problem with those who did not leave territory of the country, but considered themselves citizens of foreign countries. On April 5, 1923, a decree was issued in the Transcaucasian Soviet Republic, stating that only

persons who had been issued a passport in the country of their citizenship could consider themselves citizens of the non-socialist countries that had emerged on the territory of the former Russian Empire. As a result, the passports issued by the Estonian consuls in Tiflis were also invalidated (Luts-Sootak et al. 50). Renunciation of Estonian citizenship and acceptance of Soviet citizenship was widespread in the Estonian villages of Abkhazia in the first half of the 1920s. In 1924, a settler who had come to Estonia from the village of Estonia near Sukhum told to the Estonian newspaper 'Päevaleht' that the Estonians in Abkhazia were pressured to renounce their Estonian citizenship. He informed that Estonian passports had been taken from the locals. Those who refused to give up their passports were threatened with confiscation of their property and deportation (Eesti asundused 3). The NKVD launched a campaign in 1926 to discover people's „true citizenship“. Commissions checked the documents of people whose citizenship was in doubt. Thousands of people who were found to have retained foreign citizenship were forced to renounce it and take Soviet citizenship or leave the country. It became increasingly difficult to retain the citizenship of another country (Lohr 154).

Did Estonians who became Soviet citizens in Abkhazia automatically lose their Estonian citizenship? In the eyes of the Soviet authorities, they did. In the case of persons with dual citizenship, the Soviet power recognized only the Soviet citizenship (Ginsburgs 71). Dual citizenship was not legal in Estonia either – both the Estonian Citizenship Regulation of 1918 and the Estonian Citizenship Act of 1922 prohibited dual citizenship. However, the Citizenship Act did not allow for automatic exemption from citizenship. According to the law, those who wished to renounce their Estonian citizenship had to submit an application to the Minister of the Interior. The application had to state which country the person wished to enter, as well as a certificate of acceptance by another country. Automatic renunciation of Estonian citizenship was possible only for Estonian women who married a foreigners (Aule, Luik 13). To the best of our knowledge, no applications for renunciation of Estonian citizenship were received by the Estonian missions or the Ministry of the Interior from Abkhazia. Therefore,

according to Estonian laws, these persons continued to be citizens of the Republic of Estonia. Thus, the Estonian side considered the persons who became Estonian citizens but remained in the Soviet Union to be as Estonian citizens even if they did not return to Estonia, while the Soviet side considered them as Soviet citizens. The Soviet citizenship law of 1938 did not deal with the issue of dual citizenship at all, which means that a person with dual citizenship, who was also a Soviet citizen, was not considered as foreigner (Ginsburgs 72).

When the Soviet Union occupied Estonia in 1940 and the inhabitants of Estonia became the same Soviet citizens as the Estonians in the Soviet Union, the issue lost its relevance for a long time. It became relevant again after the collapse of the Soviet Union. Many Abkhazian Estonians who repatriated to Estonia in Soviet time had disputes with the Estonian authorities, who refused to recognize their Estonian citizenship by birth. In 2019, a precedent-setting case occurred, when the Estonian authorities recognized an Estonian passport issued almost a hundred years earlier at the Tiflis consulate as the legal basis for an Estonian from near Sukhum to acquire the citizenship of the Republic of Estonia by birth. As we have seen before, citizenship by birth allows dual citizenship, which Estonian citizenship acquired by naturalization does not. Thus, Abkhazian Estonians who could prove that they are Estonian citizens by birth could also hold a passport of another country (including Russia) as we have seen earlier.

From the point of view of Estonian officials an Estonian passport could remove the obstacles for Estonians from Abkhazia to travel to Estonia. On the other hand, Abkhazia does not allow dual citizenship, except in the cases mentioned above. Therefore, Estonians living in Abkhazia would not benefit from Estonian citizenship by birth. However, it would benefit those Estonians from Abkhazia who want to repatriate to Estonia, or those who have already repatriated to Estonia, but wish to maintain translocal ties with Abkhazia and visit this country frequently. Many Estonians in Abkhazia, who do not want to leave Abkhazia but wish to visit Estonia often, have said in the interviews that they do not need an Estonian passport, but the best solution would be an Estonian

permanent residence permit, which would make unnecessary to apply for an Estonian visa. Currently they do not have such a legal right. Recently, the Estonian embassy in Moscow has started issuing Estonian visas to Abkhazian Estonians, but on separate sheets that are not attached to their Russian passports issued in Abkhazia. In practice, this removes the obstacles to their visiting Estonia, but it contradicts the decision of Estonia and other Baltic states not to recognize the Russian passports issued in Abkhazia to the residents of Abkhazia. This type of visa also comes with restrictions – you can only visit Estonia with it, it's a one-off and valid for up to 30 days.

In recent years, the issues of citizenship of Estonians in Abkhazia have been widely discussed in the Estonian press, but only in the context of possible Estonian citizenship by birth. Abkhazian citizenship and its restrictions have been completely ignored, indicating that Estonian journalists and officials do not take into account the real situation of Estonians in Abkhazia. In many cases, this is due to a lack of information, but more often it is due to the *de facto* and only partially recognized status of the Abkhaz state. In the eyes of the Estonian authorities, Abkhazia is a separatist region of Georgia. Among all the other obstacles and restrictions, this is demonstrated by the multiple barriers to citizenship and crossing the borders for its residents.

The attitudes of the international community toward *de facto* states depend on the stance toward the parent and patron states of these entities. Political scientist Laurence Broers has compared the actions of Venezuela and Nicaragua in recognizing Abkhazia and South Ossetia with the refusal of the Baltic states and Poland to do so. Broers argues that these differing attitudes are based on the relations of the involved countries with Russia (Broers 3). Beyond attitudes toward the patron state, Russia, relations with the parent state, Georgia, also play a crucial role. For the past 20 years, Georgia has been an important ally of the European Union, including Estonia. However, a shift occurred when Georgia, under the leadership of the Georgian Dream party, refused to join sanctions against Russia following its invasion of Ukraine in 2022. After the Georgian Dream's overwhelming victory in the October 2024 parliamentary elections, Estonia and several EU countries refused

to recognize the results. In January 2025, the Estonian parliament declined to acknowledge the legitimacy of Georgia's new parliament, government, and president, while also imposing entry bans on several leading Georgian politicians. The alliance between Estonia and Georgia has as good as broken down.

How could these political changes affect Estonia's stance on Georgia's territorial integrity? In December 2024, Ruuben Kaalep, a key politician from Estonia's party ERK, made a striking statement suggesting that Estonia could consider recognizing Abkhazia's independence. Kaalep stated: *"The issue of recognizing Abkhazia has been taboo until now, mainly based on an alliance with Georgia. But if this alliance disappears, Estonia and other European countries will have to consider reassessing their position."* (Kaalep). This comment clearly illustrates how the recognition of *de facto* states is linked to attitudes toward their patron and parent states. Given that Estonia recognized Kosovo as a *de facto* state in February 2008 without Serbia's consent, a similar precedent could eventually be applied to some another *de facto* state. Whether political constellations will shift enough for Estonia and other EU countries to revise their stance on the recognition of Abkhazia remains to be seen in the future. The existence of the Estonian historical diaspora in Abkhazia does not influence the Estonian state's recognition policy towards Abkhazia. However, recognition would have a direct impact on the status of Abkhazian Estonians and their ability to maintain active communication with their motherland.

### **Conclusion**

The interests of the parent and patron states in their relations with the *de facto* state do not coincide: if the one relies on international law and the requirement of the territorial integrity of the state, the other supports separatism in the *de facto* state on the basis of its national or geopolitical interests. The Western international community generally supports the territorial integrity of the countries, although there are notable exceptions (Kosovo). The *de facto* states themselves emphasize the right of peoples to self-determination. The parent state supported by the international community, seeks to restore its interests in the *de facto* state, while

the patron state has its privileges in the *de facto* state. In the case of Abkhazia, whose parent state is Georgia and patron state is Russia, this discrepancy is evident in the citizenship policy discussed in this article. Abkhazian citizenship is not accepted by Georgia, considering the inhabitants of Abkhazia to be its citizens. This is also supported by the European Union, including Estonia. This support causes many legal problems for members of the historical Estonian diaspora in Abkhazia, which was formed during the tsarist era, established translocal ties with the motherland Estonia during the Soviet years 1940-1991, and has remained trapped in the politics of state borders, citizenship law restrictions, and non-recognition after the collapse of the Soviet Union. In addition to the non-recognition of Abkhazian citizenship, Estonian officials also do not recognize Abkhazian educational certificates, which hinders the translocal communication and mobility of Abkhazian Estonians with their motherland. The Estonian authorities require the Abkhazian Estonians to hold Georgian passports, which they do not have and which are actually difficult to obtain. In addition to the Abkhazian passport, the majority of Estonians in Abkhazia also have a Russian passport, which gives them access to Russian social benefits, but previously used to allow international mobility, including to Estonia. In last years, Estonia, like other Baltic countries, has not recognized Russian passports issued in Abkhazia, which meant that Estonians from Abkhazia could not visit Estonia with these passports. Only recently has the Estonian Ministry of Foreign Affairs found a temporary solution – to issue Estonian visas on a separate sheet to Abkhazian citizens with Russian passports. While solving the problem of practical translocal mobility, this step underlines the non-recognition of the Abkhaz state, its citizenship and the citizenship of its patron state. The article demonstrated that many Estonians in Abkhazia have the opportunity to acquire Estonian citizenship by birth, which would allow them to travel, including visiting Estonia, but would ignore Abkhazian legislation, which does not allow dual citizenship for Estonian citizens. This does not make the situation easy for Estonians living in Abkhazia – according to Georgian law, they are Georgian citizens, according to Abkhazian law, they are Abkhazian citizens, according to Russian law, most of



them are Russian citizens and according to Estonian law, many of them are Estonian citizens. However, due to Abkhazia's *de facto* status and restrictions on dual citizenship, most of the constellations of dual citizenship are not recognized – either by their residence country or by the international community. The recognition of Abkhazia by the international community, including Estonia, would eliminate discriminatory restrictions on the freedom of movement for Abkhazia's residents, including Estonians. Since Estonian authorities have not even considered recognizing Abkhazia, a more realistic solution would be to grant Abkhazian Estonians a permanent residence permit in Estonia, allowing them to practice translocal mobility between Abkhazia and Estonia. A legislative solution has not yet been found.

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