Contesting Regimes of Post-Communist Citizenship Restitution: Analysing UK Media Coverage of 'Paupers' Passports'

Eleanor Knott*

This paper unpacks the legitimacy gap existing between post-communist policies of citizenship restitution, the experiences of these policies, and the media coverage of these policies. Considering citizenship restitution first as analogous to property restitution, theoretically citizenship restitution appears as compensatory, to right the wrongs of communist- and Soviet-era seizures and border changes, and appears to establish citizenship restitution as a right. Using UK media coverage of Romania's policy of citizenship restitution vis-à-vis Moldova, the paper shows the extent to which this policy is framed as an illegitimate loophole propagated by a 'Romanian Other' which is 'giving out' EU passports, exploited by an impoverished and criminal 'Moldovan Other', and inflicted on a 'UK Self' that is powerless to stem the tide of migration and block routes to gaining access to the EU via such policies. However, the paper also contrasts, and challenges, this media framing by using interviews with those acquiring Romanian citizenship in Moldova to demonstrate the extent to which acquiring Romanian citizenship in Moldova is a costly and lengthy procedure. Overall, the paper shows the extent to which citizenship restitution is a contested procedure, constructed as a right by the state seeking to compensate former citizens, and as illegitimate by those who construct a logic resulting from feeling threatened by policies of citizenship restitution.

Keywords: citizenship; migration; restitution; Romania; Moldova

* Department of Methodology, London School of Economics, UK. Address for correspondence: e.k.knott@lse.ac.uk.

Well, I don't go in for politics much, either, but if what's in this 'ere paper is true, it seems to me as we oughter take some interest in it, when the country is being ruined by foreigners.
Tressell ([1914] 2004)

Here come the Moldovans.
Daily Mail, 6/10/2006

Introduction

In June 2015, Wizz Air – a Hungarian low-cost airline – opened a direct flight from Chişinău, Moldova's capital, to London. In Moldova, this was celebrated as a mark of progress, towards freer and cheaper movement and between Moldova and the European Union (EU), following the opening up of visa-free travel for Moldovan citizens to Schengen countries in April 2014 (Diez 2015). However, the UK media covered the opening of a direct budget Chişinău–London route as a threat to the UK, which was now exposed to, and powerless to prevent, high migration from Moldova. These Moldovans, it was reported (in particular by the UK's right-wing press), were exploiting a 'passport loophole', gaining access to the UK via Romanian citizenship (*Daily Express* 21/12/2015; *The Sun* 20/12/2015). The existence of a direct way to travel, quickly and easily, proved the existence, it was argued, of a vast number of Moldovans acquiring Romanian citizenship for the purposes of exiting Moldova for London.

On a more personal level, I have been interested in coverage of Romania's citizenship policy, first, because of its distance from the empirical findings of the fieldwork I conducted in Moldova (in 2012 and 2013). Second, the way Romanian citizenship for Moldovans was represented in the UK media was something that I observed being contested within Moldova. Analysing media coverage of citizenship restitution is significant for demonstrating the legitimacy and reality gaps that exist between the acceptance of the policy by those involved peripherally (e.g. in the UK, other EU member-states) and the experiences of those involved directly (in Romania and Moldova), as well as how citizenship and immigration are framed together through expressions of discontent with the EU.

This paper is situated, within theories of citizenship restitution, as a form of granting of citizenship that differs from acquisition by birth or naturalisation (the commonly theorised routes to citizenship). Citizenship restitution, as a policy, is particularly associated with post-communist kin-states (e.g. Hungary and Romania), and acts like property restitution to facilitate policies of citizenship restitution for citizens from pre-communist territories. This paper addresses how and why there is a legitimacy gap in framing citizenship restitution for those for whom citizenship restitution is illegitimate (e.g. the UK media) and for those for whom it is legitimate, as evidence of a genuine connection between state and external citizenry (i.e. Romania and Moldova in this instance).

The paper problematises the framing of Romania's policy of citizenship restitution as exploiting a 'granny loophole' (*Daily Express* 22/3/2013; *Sunday Express* 17/3/2013), as it has been in UK media coverage (and Western European media more generally). This paper seeks to understand, and critique, this framing of the 'passport loophole'. First the paper tries to unpack systematically how this idea of a 'passport loophole' has been constructed by the UK media. The paper will show the generation of this loophole discourse, the moments at which it has resurfaced, and the logic of this loophole discourse, which tries to delegitimise the strategy and agency of Moldovans. This discourse fails to realise the circumstances that have restricted Moldovans' access to space beyond Moldova, in particular to the west of Moldova. Secondly, the paper contrasts this construction of a loophole against Moldovans' experiences of Romanian citizenship, as a practice of restitution, using observations and interviews conducted in Moldova in 2012 and 2013.

Overall, the article argues for a more complex understanding beyond the 'granny loophole' framing of Romanian citizenship restitution that exists in current media discourses in Western Europe. Such discourses have sought to pathologise these practices of citizenship restitution without recognising the environment that has left few other options for Moldovans where Romanian citizenship could be understood as fair exchange for Soviet brutalities and Moldova's continued peripheral status.

Regimes of restitution

Citizenship is a status establishing a relationship that binds together individuals and the state through reciprocal rights and duties (Marshall [1950] 1998; Isin and Turner 2007; Vink and Bauböck 2013). The boundaries of citizenship, as defining 'membership of the state', are thus 'constitutive' of the community (Spiro 2007: 4). Studying the limitations of who belongs provides a map of the community's boundaries, so defined by the state (Spiro 2007). Citizenship, then, is a key site to observe the intersection of nation-building and state-building, in terms of civic (*ius soli*) or ethnic (*ius sanguinis*) criteria of membership (Brubaker 1992).

Many of the states that emerged from the collapse of communism and the Soviet Union, have experienced a particularly frenzied period of nation-building and state-building in the last 25–27 years. The boundaries of citizenship are therefore a useful way to understand the state's map of itself, i.e. who is conceived as belonging to post-communist states, in terms of which groups are included (e.g. external co-ethnic communities) and/or excluded (e.g. internal ethnic minorities). Alongside routes to citizenship common to most states – by birth (*ius soli* or *ius sanguinis*) or naturalisation for migrants (*ius soli*) – many post-communist states have instituted citizenship rules for former citizens and their descendants acquiring citizenship by restitution, without requiring them to reside, or ever having resided, in the state.

This paper is concerned with a particular framing of these acquisition rights: the notion of citizenship *restitution*, which go beyond citizenship by birth or naturalisation as conceived by Brubaker (1992) and Vink and Bauböck (2013). Rules of citizenship restitution are indicative of dynamics, and contestations, at the intersection of nation-building and state-building by expanding rights to citizenship retroactively, i.e. to previous citizens of the state and their descendants. Analysis of post-communist restitution has primarily focused on the restitution of property, as 'legally-mandated acts designed to compensate victims, in cash or kind, for that which the old regime had deprived them' (Offe 1993: 23). Discursively, in framing citizenship as an act of restitution – at least in the case of Romania's policy of *redobândire* (reacquisition, restitution) – and analytically, post-communist states are seeking to right previous wrongdoings and offer compensation for these wrongdoings through citizenship (Liebich 2009).

Citizenship and property restitution are therefore, to some extent, analogous via the 'restoration of his or her rights or property, prior to a loss, injury or abuse' (Iordachi 2009: 178). The implications of property and citizenship restitution are different: property restitution concerns granting rights in a domestic context, whereas citizenship restitution concerns the granting rights in a domestic and international context. What is significant in making these ideas of restitution similar is the idea of restoration. Citizenship restitution is all about 'undoing', or at least compensating for, communist policies of 'legal and political abuses and dispossessions' (Iordachi 2009: 178). Romania also denies that it is expanding 'ethnic' citizenship by allowing *any* former citizens of Greater Romania to apply for citizenship restitution. However, conceptually, scholars argue that by trying to 'recreate the citizenry of Greater Romania', at least post-territorially, this is an implicitly ethnic project (Dumbrava 2014: 2348; Iordachi 2009, Waterbury 2014). Romania appears to be trying to recreate a project that is lauded as the Golden Age of the Romanian nation, even if this was an exclusivist and autocratic (and later fascist) project which, for example, restricted Jews from holding Romanian citizenship (Iordachi 2002).

This paper focuses on the case of Romanian citizenship restitution (*redobândire)*, and how this has been framed as a 'granny loophole' by the UK media. Similar policies can be found across post-communist and post-Soviet space. However, to some extent, each is contextually specific, demonstrating how states have different legacies of seeking to restitute the citizenship of whole groups (e.g. ethnic groups) or individuals. For example, Poland has two separate pieces of legislation – of repatriation (2000) and restitution (2009) – while Romania combines these aspects in a single policy, by allowing descendants of those denied citizenship the right to citizenship restitution.[2] Russia's Compatriot Policy could also be analysed as an example of restitution, though currently it offers only quasi-citizenship, i.e. some, but not 'full citizenship', rights and benefits,[3] to former citizens of the Soviet Union and Tsarist Empire (see Kosmarskaya 2011; Shevel 2011). The point of the Compatriot Policy is, through restitution, to offer rights to those the Russian Federation feels were unfairly left outside the contemporary state borders. Restitution of citizenry can also work in reverse, as in the cases of Estonia and Latvia which still restrict citizenship from ethnic Russian communities who migrated during the Soviet Union. These states do not conceive ethnic Russians as legitimately belonging to the reconfigured state (Liebich 2009).

These regimes of restitution share a desire to recreate an imagined community that may be separate from the realities of the post-communist state, in terms of its borders and content (Iordachi 2009: 178). These regimes of restitution can also be in contestation with each other. Romania's policy of citizenship restitution in Moldova makes the majority, in theory, eligible to gain Romanian citizenship through restitution so long as they can prove descendancy from interwar Romanian citizens (up to the third generation) because the territory of Moldova was part of interwar Greater Romania. On the one hand, Romania's policy of citizenship restitution, by seeking to restore pre-war Romania's citizenry, might appear to challenge Moldova's authority vis-à-vis its citizenry and sovereignty as an independent state (Iordachi 2009). However, Romania in an official sense is also steadfast in its recognition of Moldova's independence, as the first state to recognise Moldova's independence from the Soviet Union in 1991; a fact that is often repeated to emphasise how far Romania *does* respect Moldova's sovereignty.

Figure 1. Common themes in UK media (2006–2016)

What is so far under-theorised is how policies of citizenship restitution are framed in wider media and policy debates, in particular those states that feel potentially affected by the knock-on effects of citizenship restitution and seek to challenge the legitimacy of citizenship restitution. It has been noted elsewhere how far the European media have covered Romania's policy (see Suveica 2013), and how far this coverage pathologised the process and right of Moldovans to acquire Romanian citizenship. However, as yet, no paper has systematically analysed this coverage to identify its trajectory, i.e. when and how this discourse emerged, its political positioning, its reach and its correspondence to everyday experiences of Romanian citizenship restitution in Moldova. This paper then, takes each of these issues in turn. First, the paper analyses the framing of Romania's policy of citizenship restitution within the UK media. Second, the paper analyses how this media framing emerged in UK and EU policy debates. Finally, the paper contrasts this pathological discourse, where Romanian citizenship is framed as a 'granny loophole', with everyday experiences of Romanian citizenship, which demonstrate the costs and difficulties of acquiring Romanian citizenship through restitution.

Framing a 'granny loophole': data collection and analysis

This section systematically analyses all the coverage in UK newspapers of Romanian citizenship acquisition for Moldovans, a sample of 52 articles (17 September 2006 – 17 January 2016, see Table 1 in Annex 1). The focus is on media coverage because of the significance of the press in shaping public opinion vis-à-vis the European Union and immigration, where the media is the 'clearest articulation of anti-EU sentiment' in the UK (Hawkins 2012: 562). Before 2006, no mention was found of Romanian citizenship for Moldovans.[4] The articles were read first to ensure they engaged with the issue of Romanian citizenship restitution for Moldovans explicitly. Several articles discussed acquisition of Bulgarian citizenship for Moldovans; these are not included in the analysis unless there is specific mention of Romanian citizenship also. The article also draws on interviews I conducted in 2012 and 2013 in Moldova's capital, Chişinău, with 55 ordinary individuals (primarily students and young people) who identified as Romanian and/or Moldovan, concerning their engagement with Romania's policy of citizenship (re)acquisition (elaborated elsewhere, see Knott 2015a, b).

In analysing the media coverage, the approach draws on both content and discourse analysis. I am concerned both with the frequency of certain topics – e.g. poverty in Moldova – as is typical of an inductive content analysis (Figure 1, Neuendorf 2002; Krippendorff 2004), and the meaning and knowledge constructed within these topics – e.g. how individuals are constructed as impoverished in Moldova, and the implications of this – that are more typical of discourse analysis. I developed a coding frame (Figure 2), first deductively, by differentiating between actors which comprise Self and Other (after Hall 2001, Hansen 2006): the UK Self as the voice of UK media coverage, and the Romanian and Moldovan Others as the objects (and threatening objects) of UK media coverage. This othering of Romania/ns and Moldova/ns is consistent with broader trends within the UK (and Western Europe more broadly) of othering Eastern Europe, in particular Eastern European migrants. For example, following the cessation of EU transition agreements on Romania and Bulgaria, both the BBC and Channel 4 in the UK produced documentaries which pathologised the potential for migration: *The Romanians Are Coming!* (Channel 4, February 2015) and *The Great Big Romanian Invasion* (BBC One, 17 July 2014).

Figure 2. Coding framework and prevalence of codes in media analysis
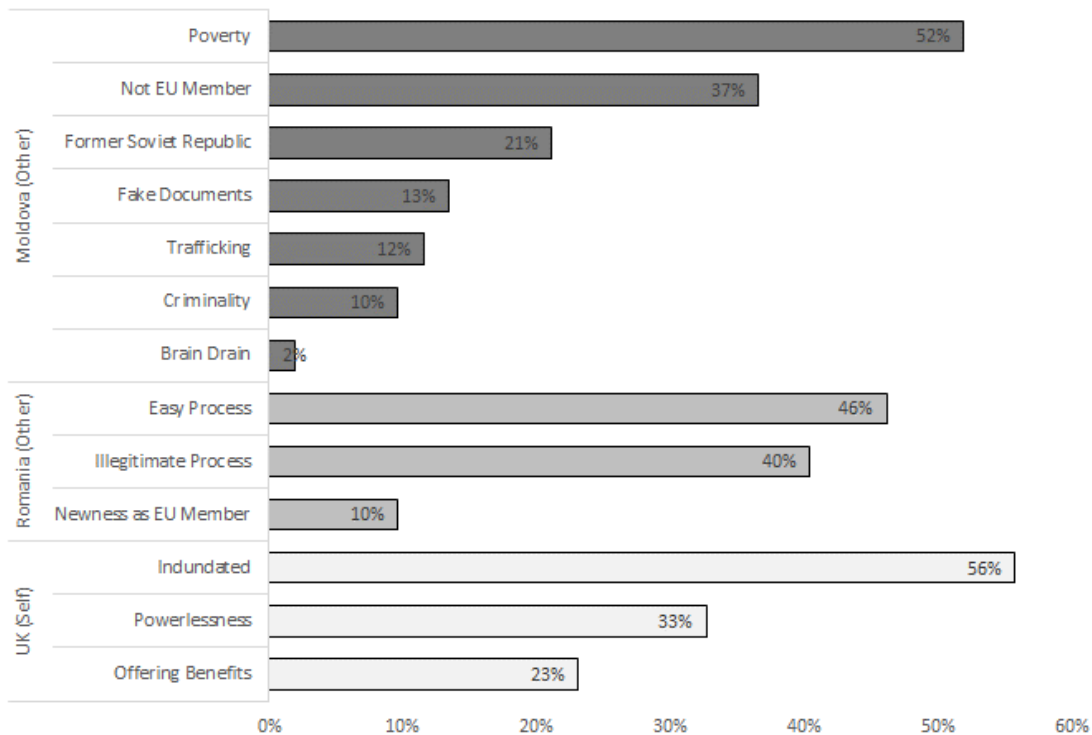
This othering of Eastern Europe has been a common argument in scholars' understandings of how the region has been portrayed, in particular since the fall of communism. Drawing inspiration from Said's (1979) notion of orientalism, scholars such as Todorova (2009) and Bakić-Hayden (1995) have theorised about the stereotypes of 'backwardness'. Bakić-Hayden (1995) describes this as 'nesting orientalisms' to explain the 'gradations' of orients, and others, present within and between Western Europe and post-communist and post-Soviet states and societies (Buchowski 2006). To a more successful degree, intelligentsia (even before the end of communism) and political elites in states such as Hungary, Poland and (then) Czechoslovakia sought to construct a 'Central European' identity to shed their sense of backwardness, connections to Russia, and to further the project of returning to Europe (Kundera 1984; Neumann 1998). Romania and Bulgaria, alongside Balkan states that were the object of analysis within the theory of 'nesting orientalisms', have been less successful in being accepted as European, or fully European, despite Romania and Bulgaria joining the EU in 2007 (Kuus 2004: 476). This 'Self/Other, Us vs Them' (Buchowski 2006) analytical framework therefore helps to unpack these degrees of otherness that Hansen (2006) describes, as part of a project of alterity and differentiation of the UK Self vis-à-vis the Romanian and Moldovan Others.

From this, an inductive framework was developed to capture the most prevalent themes (see also Figure 1), such as the criminal and impoverished Moldovan Other, the illegitimacy of the Romanian process (as the Romanian Other) and the inundation of the UK Self, threatened by a flood of Moldovan migrants to the UK via acquiring Romanian citizenship. These amounted to the characterisation of the Moldovan and Romanian others as the *exploiters*, and the UK Self as the *exploited*. Inductively, a fourth dimension was developed in relation to mentions of the external implications of Romanian citizenship acquisition in Moldova, in terms of geopolitics. This geopolitical dimension, however, is left aside in this paper, given the small number of articles (6 per cent) mentioning geopolitics (e.g. negative reaction from Russia).

Figure 3. Number of articles by publication (n = 52)
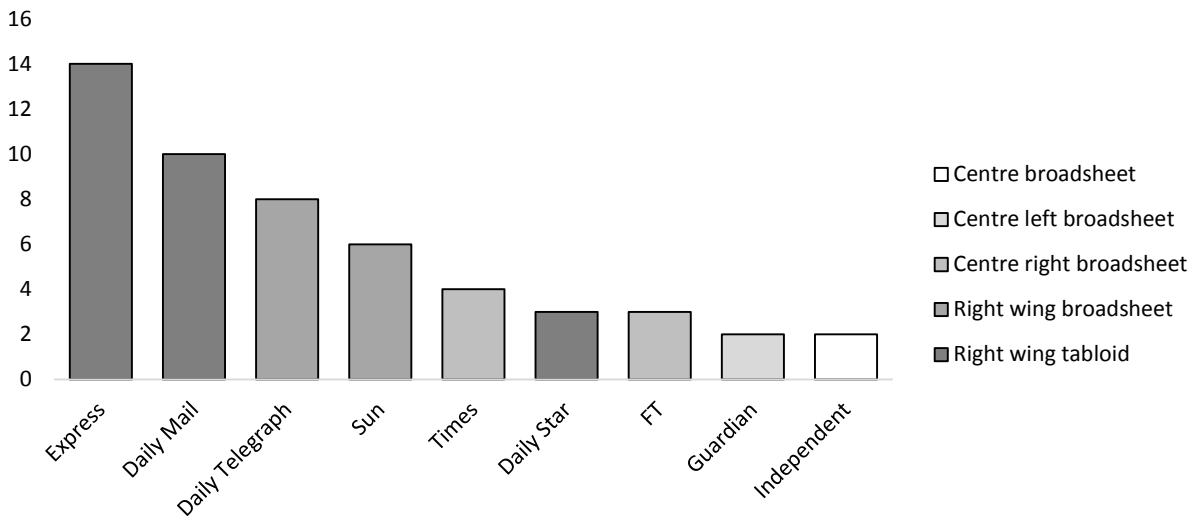
Before analysing the frames within the media analysis, it is first interesting to note that it was typically right-wing newspapers that covered Romanian citizenship acquisition for Moldovans (the *Daily Mail*, the *Daily Telegraph*) and, in particular, right-wing populist tabloid media, such as the *Daily Express* and *Daily Star* (Figure 3). By contrast, left-wing media outlets (e.g. the *Guardian* and *Observer*) covered the Romanian citizenship story far less and in a different way. For example, the single *Observer* article mocked the *Daily Mail*'s coverage of Romania as an EU member generally, and specifically its obsession with Romania's policy vis-à-vis Moldova:

> *But turn to page two, where the Moldovans are coming, apparently. 'Experts' have scared the Mail witless by predicting that '600 000 Romanians and Bulgarians May Come to the UK for Work' once they're part of Europe next January. Now 300 000 Moldovans, it seems, 'have taken advantage of a special arrangement that allows them a Romanian passport' [their parents were Romanian], so they're coming too. Cue ritual paragraph about 'sex slaves' and ritual quote from MigrationWatch* (*Observer* 15/11/2006).

This is consistent with trends concerning coverage of immigration debates in the UK media, as well as the tendency for the right-leaning tabloid media in the UK to pathologise East-European migrants (Greenslade 2005; Gabrielatos and Baker 2008), and demonstrate scepticism towards the EU and EU expansion (Light and Young 2009), and for left-leaning media to counter this framing (Hawkins 2012).

UK media coverage also emerged and re-emerged at specific points (Figure 4): at points of unrest in Moldova ('Twitter Revolution' / summer 2009),[5] at points of EU accession (2007) and removing of transition agreements (beginning 2014) and, most recently, with expanding and direct travel routes between Moldova and the UK (end 2015). There was also an explosion in the wake of Moldova's so-called Twitter Revolution (e.g. 13 articles in 2010), responding to Romania's then President Traian Băsescu's comments that Romania had received 800 000 applications for citizenship from Moldovans.

Figure 4. Number of articles by year of publication (n = 52)
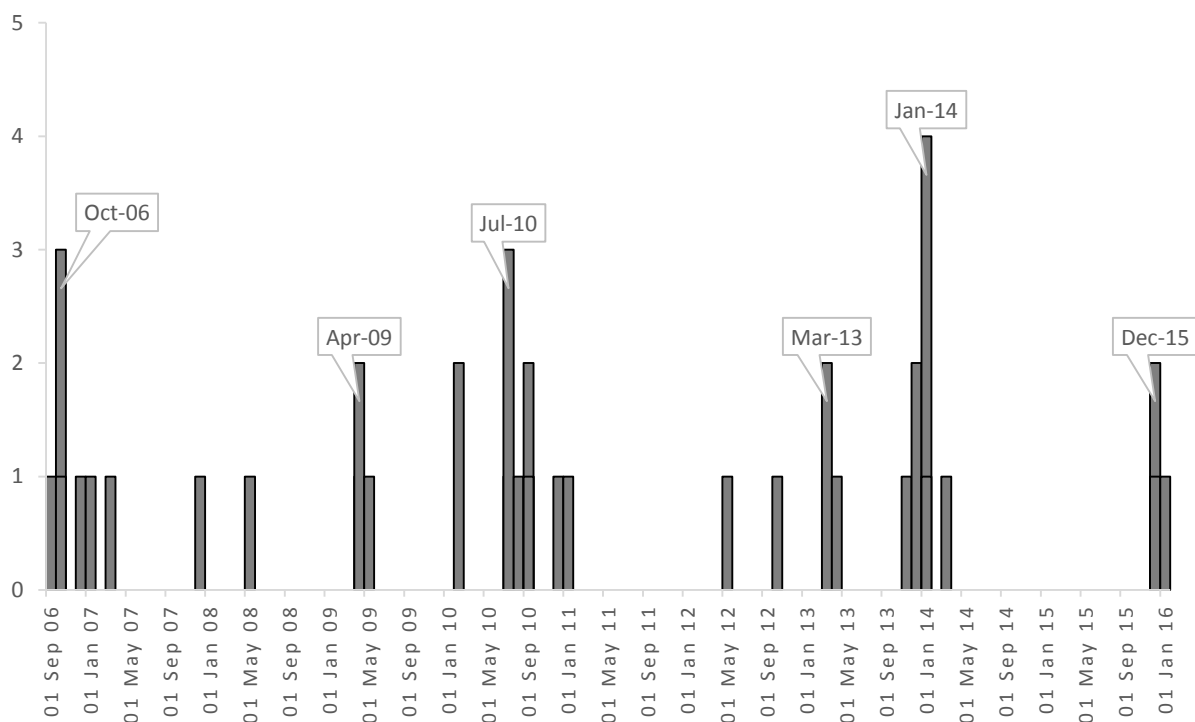
The rest of this section discusses the media coverage of Romanian citizenship for Moldovans more substantively, in terms of the dimensions of exploited Self and two exploiting Others (Romanian, Moldovan). It discusses both the prevalence of the issue of Romanian citizenship in the UK press and the way in which it was discussed through these dimensions of Self and Other (Figure 2).

The poor Moldovan Other

Moldova was constructed as an impoverished, non-European Former Soviet *Other*. Only one article commented on the negatives of mass Romanian passport acquisition by Moldovans, namely that it might contribute to a brain drain of Moldova's 'young and ambitious' citizens (*The Times* 22/9/2010). To some extent this is intuitive: the UK media is unlikely to care much about the fate of Moldovans and care more about the impact within the UK. Yet, as discussed below, this finding also has implications for the power relations constructed between a Moldovan *Other* exploiting (a wealthier) UK *Self*.[6]

Most articles drew on Moldova's poverty and poor socioeconomic prospects in terms of jobs and opportunities where '90% want to leave' (*Daily Telegraph* 19/7/2010). Moldova was a site of contrast as the 'poorest country in Europe' (*Daily Telegraph* 1/1/2014, *Daily Mail* 31/12/2013), equivalent to Sudan in terms of living standards (*Sunday Times* 18/7/2010). It was framed also, specifically, as 'even poorer' than the new member-states like Romania (and Bulgaria) which were granting access to citizenship (*Sunday Times* 31/12/2006), framing Moldova as a double Other, in reference to Romania and the UK.

This poverty frame was linked to the status of Moldova's Soviet past, as an 'impoverished former Soviet state' (*Daily Express* 2/2/2010). This made Moldovans both likely to migrate, because of their level of poverty, as a 'non-EU' Other (*The Sun* 1/1/2014). Moldovans – as 'outsiders'– were accessing Romanian citizenship to facilitate their migration (*Sunday Express* 15/8/2010).

Thus, poverty in Moldova was not only about socioeconomics but also about identity, because this poverty contributed to Moldovans' otherness, as neither 'European citizens' nor Europeans. This identity component, as not European, was depicted as significant for the illegitimacy of Romania's citizenship policy, because the UK public might 'understand', though disagree with, free movement for EU citizens. However, the UK media explained that they would not extend the same level of understanding to Moldovans, as poor non-EU Others who did not have the right to EU citizenship.

A further frame constructing Moldova as a threatening Other, especially before 2010, was the association between Moldova and criminality. Moldova's criminal reputation, as a site of 'human trafficking, prostitution and gang activity' posed a danger to the UK because Romanian citizenship allowed 'notorious gangsters' to come into the country 'legally' as 'migrants' (*Daily Express* 4/11/2013). Moldova's (and Romania's) criminality and rife corruption were also constructed as threats to the UK. For example, as the *Daily Express* professed: 'the road from Chişinău (capital of Moldova) to Chesterfield is only a floppy document away – I mean a dog-eared passport issued by a corrupt official for a lot less than £150 000' (*Daily Express* 21/3/2014).

Moldovans, then, were framed as exploiting, both illegally and legally, the 'loophole' (*Daily Express* 22/3/2013; *The Sun* 14/10/2012) established by Romania which, through 'bogus citizenship' (*Daily Star Sunday* 6/5/2012), allowed 'millions of eastern Europeans' entry to the EU 'through the backdoor' (*Sunday Express* 17/3/2013; *Express* 24/9/2010). What Moldovans were acquiring in Romania was therefore not Romanian, and thus EU, citizenship. Rather, more materially and strategically, Moldovans were acquiring a passport as a travel document, providing rights that, UK media claimed, were illegitimate for Moldovans to hold. Moreover, this acquisition procedure was further delegitimised by how the UK media framed Romanian citizenship being procured: either via criminal means or via a legal loophole explained by Moldova's poverty.

By being nested within European citizenship, Romanian citizenship was not constructed as a right for Moldovans, as the idea of citizenship restitution indicates. Rather, Moldovans were constructed as a double Other, even poorer than Romania, and engaging in a strategy of exploitation, underpinned by poverty and the desire to leave Moldova, which Romanian citizenship illegitimately offered.

The illegitimate Romanian Other

This sense of illegitimacy translated into how Romania's policy was framed vis-à-vis Moldovans, contesting the right of Romania to offer Romanian citizenship restitution and framing the process as inherently (too) easy. As a new member-state, Romania's legitimacy within Europe was also questioned, not just to the extent of their right to have policies with these implications, but because the UK begrudgingly had to 'accept they [Romanians] are fellow Europeans' (*Mail on Sunday* 5/1/2014). The UK, as UK media discourses claimed, did not have to accept Moldovans acquiring Romanian citizenship. Romania's policy of 'handing out' Romanian (*Sunday Express* 15/8/2010), and EU passports (*Daily Express* 24/9/2010) to Moldovans was framed as 'very easy' (*Daily Express* 21/12/2015), by virtue of its attachment to a single relative 'as far back as great grandparents' (*The Sun* 20/12/2015).

Romania's corruption was framed as increasing the easiness of this process. For example, 'corrupt officials' and Romania's 'lax' controls meant that applications could be 'fast tracked' even more (*Daily Mail* 31/12/2013). Some media coverage framed Romanian citizenship as if Moldovans could just 'fill in forms and hand over 100 euros' (*The Sun* 14/10/2012) to receive Romanian citizenship. On the one hand, Moldova was described as impoverished, yet on the other, '100 euros' was referred to as a small sum of money, as opposed to ~16 per cent of annual GDP per capita. There were two interesting exceptions, from 2007, noting the bureaucratic difficulties experienced by Romania, which limited how many applicants could be processed to 20 000 per year, and thus meant acquiring Romanian citizenship was a lengthy procedure (*The Times* 1/1/2007;

Financial Times 2/3/2007). However these were not reported by the UK tabloid right-wing press but by broadsheet media.

There was some mention of Romania's rationale, that Romania claims it is 'giving back' Romanian citizenship to reflect the policy of restitution (*Daily Mail* 6/8/2010). However, this was disputed by UK media coverage, which aligned the policy with ethnicity and common ancestry. For example, several articles claimed that Romania was 'granting citizenship to ethnic Romanians' (*Sunday Times* 18/7/2010; *Daily Telegraph* 22/3/2013), consistent with claims that Romania was acting illegitimately. Romania's policies thus enabled Moldovans to 'exploit their right to Romanian passports' and the 'loophole' which allowed such a right to exist (*Sunday Times* 31/12/2006).

This construction of a Romanian Other – criminal, impoverished and illegitimate – exploiting the UK Self resonates more broadly beyond Romania's citizenship policy vis-à-vis Moldovans, in terms of Romanian migration practices more generally and beyond. For example, Ibrahim and Howarth (2016) show how the horse-meat scandal in the UK was constructed along similar lines and interwoven within a pathology of Romanian migration, coinciding with documentaries depicting Romanians as flooding to the UK (*The Romanians Are Coming!*, see also Cheregi 2015). Ibrahim and Howarth demonstrate how the UK media constructed an 'uncouth' Romania, which could be held culpable for the scandal as a 'threat' to the 'moral and civilised (…) British nation' by its criminal and unsafe food and hygiene standards, which were contaminating Britain – and Europe more generally. This depiction of Romania becomes, discursively, possible when remembering how Romania has been framed in the UK since the fall of communism: as a poor state rife with unwanted orphans.[7]

The inundated UK Self

What was significant in coverage of the Romania's citizenship policy was not just the coverage of the Others (provider and recipient) but of the UK Self, as an actor that was directly and explicitly linked to, and threatened by, Romania's policy. It was predominantly the right and far-right UK tabloid press with high readerships (e.g. *The Sun*, *Daily Mail* and *Daily Express*, and their Sunday papers) that covered Romania's policy vis-à-vis Moldovans.[8] Yet these discourses, albeit less viscerally, also made their way into *The Times* and *Daily Telegraph*.[9]

Romania's policy not only provided a 'back door' to the EU, by Romanian citizenship providing EU citizenship, but also acted as a 'back door into Britain' (*The Sun* 14/10/2012). Amplifying this sense of threat was the number of people that might be exploiting this loophole. This was framed quantitatively – '10 000 per month' (*Daily Express* 22/3/2013), 'hundreds of thousands' (*Daily Telegraph* 31/12/2013), and '1 million Moldovans head for Britain' (*Daily Express* 19/7/2010) – and qualitatively, as a 'flood' and wave of 'mass migration from Moldova to the UK' that threatened to inundate the UK thanks to Romania's policy (*The Sun* 1/1/2014; *Daily Express* 22/3/2013, *Daily Telegraph* 19/7/2010). This qualitative framing helped to increase the sense of the threat by framing the migration levels as unquantifiable, i.e. 'countless' Moldovans (*Daily Express* 21/12/2015), as well as the militant way this inundation was framed, as if Moldovans were beginning the 'long march to enter Britain' (*Sunday Express* 17/3/2013) and 'may beat a path to Britain' (*Mail on Sunday* 5/1/2014).

This collapsed logic reinforced the idea that the desire to enter the UK, specifically, was a major motivation for acquiring Romanian citizenship. According to this logic, individuals were acquiring citizenship from Romania to travel to 'wealthier countries', like the UK, to escape 'impoverished' post-Soviet states, like Moldova, 'just so they can milk the EU system' (*Daily Star Sunday* 6/5/2012) and benefit from the 'embrace of the British welfare state' (*Daily Express* 2/2/2010). One article from *The Sun* (20/12/2015) even when as far as to claim, paradoxically, that this inundation, and the motivations underpinning it, were proof that the UK was the

'victim of its own success'. Through these discourses, these right-wing outlets were also able to express their economic anti-welfare state agenda, and the link between the welfare state and immigration, as if migrants unfairly exploited the benefits provided by the UK.

Against the threat of inundation, the UK Self was framed as powerless to prevent this flood of Moldovans. This powerlessness was expressed both because the UK devolved powers to the EU (which permitted access to EU rights, and thus the UK) and because of the powerlessness of the EU (and the UK) to influence Romania's policy. Thus, there was 'nothing Britain' nor the EU could do (*The Sun* 14/10/2012), because 'Romanian and Hungarian politicians have more say who can come to the UK than do British MPs' (*Daily Express* 8/1/2011), because the right of citizenship was a 'sovereign right of all member-states' that made 'Brussels' just as 'powerless' as the UK (*Sunday Times* 18/7/2010). That the UK government was 'powerless' was also a critique of the government, who were unable to 'slow the arrival of migrants', even of 'non-EU' migrants (*Daily Telegraph* 31/12/2013), and of the EU, whose 'rules' restrict what the UK could do (*The Sun* 20/12/2015). The desired response was to be able to exert more self-determination: to 'govern ourselves and control our own border' (*Mail on Sunday* 5/1/2014).

This emphasis on powerlessness fits within broader Eurosceptic and anti-immigration narratives, which have been more intense in the UK in terms of media coverage (Semetko, de Vreese, and Peter 2000; Gleissner and Vreese 2005), successive UK governments (Ford, Goodwin, and Cutts 2012), and public opinion (Aspinwall 2000), than in other EU member-states. In a comparative context, the UK has a more problematic relationship with the EU as if this relationship has encumbered a loss of sovereignty and identity (Ibrahim and Howarth 2016: 6), and where far fewer in the UK identify as European exclusively or in combination with national identity (Hawkins 2012). Rarely in the UK is the EU portrayed as an institution which has contributed to the UK, politically, economically, socially or culturally; rather, the EU is framed as a 'hostile, quasi-imperial power' that has hindered UK development, self-determination and security (Hawkins 2012: 565). In particular, Eurosceptic narratives have emphasised the right of the UK to *choose* to be 'in or out', where the powerless frame signifies the inability of the UK to control EU migration (Daddow 2013), in part because the EU has not been seen as something that the UK participates in, but rather as something that has been inflicted on the UK (Hawkins 2012).

Debates preceding the UK's EU referendum in 2016 reflected this perspective, interweaving narratives of immigration and self-determination (i.e. the ability to exercise choice within the UK concerning who can immigrate, how many and the origin of migrants) that were at the forefront of the campaign to leave the EU. A speech by leading campaigner for the UK to leave the EU, Boris Johnson (26/5/2016, *The Only Way to Take Back Control of Immigration Is to Vote Leave on 23 June*), mentioned the idea of 'control' 17 times before concluding:

> *The British public support immigration but they want it controlled by those who they elect [sic]. They are generous but feel their generosity has been abused. They are right. On the 23 June they will get their chance to take back control.*

This was reflected in those supporting the successful campaign to leave the EU. Data from The British Election Study Team (2016) showed immigration to be the dominant issue discussed by leave voters, followed by borders, control, and sovereignty as prominent concerns of leave voters.[10] Showing the same trend, an Ipsos MORI (2016) poll indicated that immigration was named as one of the central concerns of voters in the period preceding the referendum (33 per cent in June 2016), and was increasing over time (28 per cent in May 2016). The effect of this rising anti-immigration sentiment was a spike in reported hate crime in the UK (May-July

2016, UK Home Office 2016), explained by a 'celebratory racism' having won a mandate to 'take back control' of the UK from the EU (Khaleeli 2016).

This provides the broader context of understanding how immigration has been situated, and pathologised, vis-à-vis the EU. Analysing coverage of Romanian citizenship by UK media through the analytical frame of Self and Other highlights the dichotomy between the exploiting Others, who were exploiting an illegitimate loophole to gain rights that they did not deserve, and the exploited Self, whose generosity and wealth was being exploited but who was powerless to affect EU or Romanian policy. This discourse of the *exploited Self* was used, directly, to critique Romania's policy, and indirectly, fitting within a pathology of EU migration more generally, where the ability of non-EU migrants to access the UK through Romanian citizenship was a frame used to question EU freedoms more generally.

'Pauper's passports'

The critical coverage of Romania's citizenship policy for Moldovans is one example of coverage of extra-territorial citizenship policies (see Table 2), including similar policies of restitution (Hungary) and kin-state co-ethnic citizenship (Bulgaria vis-à-vis Macedonia), and programmes offering investor citizenship (Malta). The coverage of Romanian citizenship reflects the wider coverage – for example, the *Daily Star*'s (25/9/210) description of Bulgaria's policy of facilitated citizenship in a particularly dehumanising way as 'Pauper's Passports', redolent of nineteenth-century industrial British poorhouses. Similarly, the *Daily Mail* (6/8/2010) argues that, collectively, these policies (of Romania, Bulgaria and Hungary) will contribute 'nearly five million citizens' to the population of the EU, by granting citizenship to those external to the EU, such as Moldovan citizens, to exploit the benefits of generous and richer EU member-states.

Coverage of investor citizenship programmes differed, in a way that merits further analysis, by virtue of the applicant being a wealthy (Chinese, Russian or Middle Eastern), but perhaps no less prone to criminality, Other. This Other was framed as motivated by the same ends, to 'secure a base in London' (*Financial Times* 13/10/2013) and 'even to claim benefits' (*Daily Mail* 20/2/2014) via the Maltese Other, as the provider of investor citizenship, which is 'in effect selling EU citizenship but pocketing the cash', i.e. exploiting the benefits of EU citizenship for financial gain (*Financial Times* 13/10/2013). UK media also reflected on the prospect of 'selling British nationality for hard cash', which for the *Daily Mail* writer, Tom Utley, was an 'idea' that 'fills me with distaste' (*Daily Mail* 28/1/2014).

What was most insightful from the negative coverage of investor citizenship was the realisation that increasingly restrictive and 'onerous' migration rules were partly responsible for this phenomenon of states selling, and willing consumers buying, citizenship (*Financial Times* 8/4/2016). These policies of citizenship and restricted immigration became self-reinforcing, where investor citizenship programmes would 'only end up strengthening the hand of those who believe that freedom of movement across the EU should be abandoned altogether' (*Financial Times* 10/10/2013; see also *Guardian* 10/12/2013). This logic was, however, notably absent from the 52 articles covering Romania's citizenship policy vis-à-vis Moldova, perhaps explained by the legitimacy given to the wealthy to migrate but not the 'poorest' in Europe.

From media to politics: the traction of the 'granny loophole' logic

It is informative to trace, intertextually, how these media framings make their way, and affect, political discourses within the UK and the EU. For example, these articles are often cited in political debates as evidence of Romanian and Moldovan malfeasance, repeating the idea that Romania's citizenship policy vis-à-vis Moldovans is an illegitimate loophole.

Within the pretext of a UK bank bench discussion concerning Romanian and Bulgarian immigration, Conservative MP Phil Hollobone reflected UK media discourses that it was necessary to consider this path of immigration more broadly because 'other nations in eastern Europe (…) can access Romanian and Bulgarian passports through grandparent rights' (Hansard 2013). This posed a threat to the UK, for example to health service provision (as cited by Hollobone), because after migration transition controls ceased in 2013, the 'hundreds of thousands of Moldovans' that 'are signing up to get Romanian passports' would be then able to 'take advantage' of the abolition of controls and 'We can bet that those people will also be coming towards London' (Hansard 2013). Following the same logic as UK media coverage, the link between what was occurring in Moldova, via the Romanian consulate, and the UK and London as a hub for migrants was stressed, and the same assumptions made that Romanian citizenship was easy, while illegitimate, for Moldovans to acquire.

Within the EU context, too, there is the idea of exploitation of old member-states by newer, poorer member-states (e.g. Romania), who are 'making a mockery of the EU's free movement rules, and undermining any pretence of EU border controls' (Roger Helmer UK MEP, UKIP/EFD, European Parliament 2014d), and threaten to flood the EU labour market with poor and unskilled workers (European Parliament 2014c, 2010b). Yet again, the dehumanising rhetoric present in UK media coverage is evident in MEP comments, in particular by far-right politicians (UKIP, FPO).[11] For example, Franz Obermayr (FPO/NI, Austrian MEP) equated Moldova to Sudan, in terms of standards of living, and asked what the EU Commission would do to protect against the threat of 'cheap labour' and 'social dumping' in EU member-states resulting from Moldovans acquiring Romanian citizenship (European Parliament 2010c). As such, this practice was pathologised for threatening EU member-states and because it was framed, by far-right politicians, as 'violat[ing] the spirit of the European Treaties' (Andreas Mölzer, Austrian MEP, FPO/NI, European Parliament 2013).

By contrast, Romanian MEPs staunchly opposed this pathologisation. They sought to reframe the citizenship acquisition by contrasting what they saw as legitimate restitution – 'by persons who have lost for reasons beyond them!' (Elena Oana Antonescu PPE/P-DL) – and those states that provide citizenship through illegitimate means, such as Malta who are 'selling' member-state (and thus EU) citizenship (Renate Weber PNL/ALDE, European Parliament 2014b). Here the tension between restitution and commodification of citizenship becomes evident, in the contest between what is constructed as legitimate by the different selves of this debate: Romania vis-à-vis what it conceives as former citizens, and 'old' member-states (who themselves may be 'selling' citizenship or at least promoting investor citizenship), who perceive a sense of threat from Romania (and other post-communist states' / new EU member-states' policies).

Finally, from an EU perspective, the EU Commission has been fairly resolute that citizenship is among member-state competences which 'do not fall within the ambit of European Union law' (European Parliament 2010a). However, by 2014, the Commission has been more implicitly critical of the commodification of citizenship arguing that, because citizenship rules within the EU are based on 'sufficient trust', that 'citizenship must not be up for sale' (European Parliament 2014b). By contrast, the EU have been (at least up to 2014) less concerned with Romania's policy since, according to the Commission, it is based on a 'genuine link' to Romania, while selling citizenship is not (European Parliament 2014a).

Debates about the right to citizenship restitution are ongoing and represent a dichotomy between providers and opponents of citizenship restitution. Providers of citizenship restitution, like Romania, legitimise their right to compensate those (and their descendants) who lost Romanian citizenship due to factors outside their control (e.g. Soviet annexation). Meanwhile, opponents of citizenship restitution, who feel a sense of threat by citizenship restitution and contest that post-communist states, as new EU member-states, have the right to increase their citizenries substantially and, more problematically, with potential migrants to Western Europe. The paradox is that those same states that have policies that commodify citizenship through offering citizenship for sale contest the idea that citizenship is a right that can be restituted. It is likely that these states might

be more sympathetic to the right of restitution but for the fact that this is encased within an anti-migration rhetoric that sees those acquiring citizenship through restitution as poor, desperate and likely to migrate.

The reality, however, is that Moldovans have been migrating since the fall of the Soviet Union and form, through remittances (~36 per cent GDP), the backbone of Moldova's economy. If anything, citizenship restitution provides a means to legalise the status of those who might have migrated anyhow. This is reinforced by the following section, which reviews experiences of Romanian citizenship acquisition, and shows the extent to which marginalisation of Moldovans, in terms of their travel rights and in particular alongside Romania's path to EU accession, whereby Romanian citizenship offered opportunities that Moldovan citizenship did not, because of international restrictions and an increasingly securitised approach to travel and migration, between those in and outside of the EU.

Examining the 'granny loophole' from below

This section seeks to complement the analysis of media framing above, by offering a contrasting perspective from on the ground in Moldova, in observations and interviews conducted in 2012 and 2013. The section focuses on two important elements of Romanian citizenship acquisition: the everyday prevalence of discussions of Romanian citizenship and the difficulties of acquiring Romanian citizenship. This is based on the realities and costs of application that are overlooked by media coverage and demonstrate how the prevalence of Romanian citizenship is mediated by these realities.

Firstly, in everyday life, discussions of, and applications for, *redobândire* were normalised and ubiquitous because there was a 'bit of a gold rush right now' [MD-23, MD-24, MD-33, MD-4[12]]. This gold rush included respondents and elites, with respondents detailing the engagement of the political class with *redobândire*, including many of the current government and judges in the Supreme Court [MD-56, MD-41].[13] This proliferation attracted peripheral services, with the surroundings of the Romanian embassy in Chişinău saturated with translation, reprographic, advocacy, transport and archival services. This also opened up an informal economy of services, based around 'intermediaries',[14] and the corrupt practices which were endemic to the procedure, where €4–5 000 could procure a Romanian passport, fuelling a connection between corrupt citizenship practices, political scandals and organised crime [MD-17, MD-5, MD-9, MD-15, MD-11, MD-36, MD-42, MD-49].[15] In this sense, media coverage (on this issue) was not wholly unfair in its depiction of the corrupt underbelly of Romanian citizenship in Moldova; the criticism would be more in terms of the prominence given to corruption in the international media.

Secondly, applying for Romanian citizenship via restitution was a costly and lengthy process, though often conceived as less hassle than acquiring a Romanian or Schengen visa. While the rights of Moldovans to travel to the EU improved in 2014, following visa-free access,[16] respondents experienced discrimination, restrictions and 'total hell' of travel to EU member-states as a Moldovan citizen without a Romanian passport during the period of fieldwork [MD-9, MD-15, MD-40, MD-37]. These restrictions worsened with the tightening of Romanian requirements pre-accession (2002), causing a 'real[ly] big change and big shock' for Moldovans [MD-23]. Applying for visas was costly[17] and time-consuming, and it was often harder, in their eyes, to acquire, a Romanian visa than a Schengen visa [MD-3, MD-4, MD-47, MD-42, MD-23, MD-51, MD-8, MD-11, MD-15].

Yet, applying was still a 'complicated' process [MD-26a, MD-14]. It required respondents to spend 'too much time' waiting (~1–2 years) for Romania to complete their application, because of the inefficient and under-staffed Romanian bureaucracy [MD-2, MD-9, MD-44].[18] Before respondents could apply, it could take many years to gather the necessary documents: to retrieve original documents from the archive, which was a 'mess' [MD-32], and to standardise and translate Soviet-era documents, to account for forcible name changes

[MD-16, MD-25b, MD-4, MD-56].[19] Documents could be missing from the archive, in particular for those whose relatives were deported in the early Soviet period [MD-51].[20] *Redobândire* was a costly procedure (~€200) requiring individuals to invest time and money in retrieving and *Romanianising* their documents, including acquiring Romanian birth certificates [MD-51, MD-25a, MD-4].

Redobândire was therefore a costly, time-consuming and difficult procedure, even if it was described as less difficult than accessing visas from EU member-states [MD-52, MD-56]. These experiences contest simplistic media portrayals, as analysed above, which focus on framing Romania as illegitimately *handing out* passports, as opposed to engaging in a policy of citizenship restitution.

Previous research by the author (Knott 2016), considers how far Romanian citizenship is strategic (motivated by the benefits of EU travel and working rights), symbolic (motivated by Romanian identification), or legitimate (motivated by a normative sense that Romanian citizenship is a right). This research argues that although strategic motivations are significant they do not, alone, explain the popularity of Romanian citizenship restitution in Moldova. Rather, I find that strategic motivations are entwined with framing Romanian citizenship as natural and normal and, thus, legitimate, as well as entwined with Romanian identification for a significant number of respondents. Thus, Romanian citizenship is more complicated than the frame that Romania is 'handing out' passports. Moreover, the logic of why Moldovans acquire Romanian citizenship is aligned with it being a process of restitution, as a form of compensation, demonstrating the significance and legitimacy of Romanian citizenship restitution in Moldova, as well as a necessity for navigating the restrictions of being Moldovan in the twenty-first century.

Conclusion: reframing regimes of restitution

This study has sought to unpack the logic behind the legitimacy gap existing between those providing and engaging with citizenship restitution and those who feel affected by the impacts of citizenship restitution, even if in reality these impacts are minimal. Theoretically, the paper began by outlining citizenship restitution as a strategy used by states, with a similar moral underpinning as property restitution. These states seek to compensate former citizens and recreate former citizenries, as part of post-communist nation- and state-building projects to cement the idea of who belongs to contemporary nation-states. This can largely be irrespective of contemporary territorial boundaries, including those beyond the nation-state boundaries, such as Moldovans vis-à-vis Romania, while excluding those within the nation-state, such as ethnic Russians in Estonia and Latvia.

Empirically, the study examined how Romania's policy of citizenship restitution for Moldovans was covered by the UK media, and contrasted this with on-the-ground observations about the difficulty and costs associated with applying. Existing literature had demonstrated the extent to which Western European media had pathologised Romania's policy as exploiting a loophole, as opposed to offering a form of compensation of rights, as citizenship restitution has been conceptualised (e.g. Suveica 2013). By contrast, this paper offers a systematic analysis of this coverage, within the UK context, through an exploration of national newspapers: which newspapers had greatest coverage, the points in time they covered the issue and how they covered the issue. In line with previous analysis (*ibidem*), it was predominantly the right-wing tabloid press that covered Romania's policy, aligning with a rhetoric that saw the UK as more generally threatened by EU migration. This rhetoric emerged in UK broadsheet newspapers: on the right it mirrored the tabloid critique, though less viscerally, while on the left, the few articles often engaged in a counter-critique of how the issue was covered by UK tabloids. This analysis also identified specific moments at which the issue of Romanian citizenship for Moldovans emerged, and re-emerged: in the lead up to Romania's EU accession (2006–2007), during Moldova's political crisis (2009–2010), at the point of the end of EU transition arrangements (2014), and following

the opening of a direct low-cost route from Moldova to the UK (2015). These moments, alongside how Romania's citizenship policy was framed, are important for demonstrating how far it was perceptions of changes in Romania and Moldova that increased the sense of threat posed to the UK by Romania's policy, in terms of illegal and legal migration routes.

Substantively, the analysis showed how the UK media coverage was broken down into a threatened, powerless and exploited UK Self, against two illegitimate Others: the Romanian Other, as a state that was giving out passports too flippantly and via a loophole, and the Moldovan Other, as individuals from an impoverished, non-European state that was wracked by corruption and criminality. The Moldovan Other did not have rights to be Romanian, legally, or European but rather was exploiting the loophole provided illegitimately by the Romanian state.

The portrayal of Romanian citizenship contrasted significantly with on-the-ground experiences, which contested the idea that Romania is simply 'handing out' Romanian passports to those who can fulfil the requirements of the 'granny loophole'. Rather, applying was costly, in terms of time, resources and financial means, in particular given Moldova's socioeconomic context. However, these on-the-ground experiences demonstrate how far Romanian citizenship was still less costly, time-consuming and humiliating than acquiring a Romanian and/or Schengen visa, which had become increasingly difficult for Moldovans (until EU visa-free travel in 2014), while the status of becoming a Romanian, and thus an EU citizen, had more significance.

UK media coverage also contested the idea of Romania's policy of citizenship restitution demonstrating the gap in conceptualising what citizenship is: as a *right*, that can be lost and reinstated en masse, or a *commodity*, which can be bought and sold by a privileged few, as reinforced by debates within the EU. Moreover, UK media coverage rarely referred to Romania's policy as facilitating Romanian *citizenship* but rather as offering Romanian *passports*, as a travel document rather than a status of belonging or institution recognising rights, vis-à-vis Romania and the EU. This paper has shown therefore the image problem that policies of citizenship restitution entail, with a legitimacy gap existing between the states offering opportunities for citizenship restitution and states that feel peripherally threatened, especially when this is situated within a context where the idea of migration, and the right to migrate, is increasingly pathologised. This article recognises the particularly Eurosceptic and anti-immigration frames contained within the UK media, in comparison to other European media outlets. It would still be of interest in future research to examine not just how media within EU member-states frames the EU vis-à-vis immigration, but to include analysis also of the EU vis-à-vis debates of citizenship restitution, and the meaning and practice of member-state versus EU citizenship more broadly.

Notes

[1] Although Moldovans still require visas to visit the UK.

[2] I am grateful to Dorota Pudzianowska for pointing out this difference.

[3] E.g. Facilitated migration to Russia and access to scholarships to study in Russian universities.

[4] There may be other articles in UK media discussing this issue; however a reasonably comprehensive search was conducted where this sample represents, at least, the majority of the coverage searching for 'Romania + Moldova + passport' and 'Romania + Moldova + citizenship'.

[5] The so-called Twitter Revolution describes the protest event in April 2009, following claims of fraudulent elections by the incumbent communist government, which eventually lost power following second elections in July 2009.

[6] I am grateful to the participants of the MACIMIDE workshop for pointing this out.

[7] I remember, when I was a child in the UK, the frequent coverage of Romanian orphanages on Newsround back in the 1990s, a daily British news programme for children. It has only been through writing this paper,

that I remember the assumptions and stereotypes that I overcame about Romania when I first visited in 2006; before this, Romania seemed both backward and exotic, an orient nested within Europe, while soon after it joined the EU in 2007.

[8] Press Gazette estimate net readership (print, computer and mobile/tablet) of UK papers in 2016 to be in descending order: *Daily Mail* (23 449 000), *The Sun* (13 628 000), *Daily Express* (6 839 000) (Ponsford 2015).

[9] Press Gazette estimate net readership in 2016 in descending order: *Daily Telegraph* (16 357 000) and *The Times* (4 911 000) (Ponsford 2015).

[10] This contrasted to the largely economic concerns of those UK voters who sought to remain in the EU (The British Election Study Team 2016).

[11] Following Halikiopoulou and Vlandas (2016) and Mudde (2007), I classify FPO and UKIP as 'far right' (or populist radical right, as Mudde (2007) classifies). Here, Halikiopoulou and Vlandas (2016: 639) define the 'far right' as parties that are 'characterised by nationalism, authoritarianism and populism'.

[12] 'MD' stands for an interview conducted in Moldova, the number indicates the number of the interview.

[13] This has been reported in the media also (see Agerpres 2013).

[14] MD-36 believed that acquiring a Romanian citizenship/passport using intermediaries could cost €4–5 000.

[15] These corrupt practices have been covered in the media also: the *EU Observer* reported applying for Romanian citizenship in Moldova with fake documents (Mogos and Calugareanu 2012), while it is alleged that Vladimir Plahotniuc, a well-known Moldovan oligarch affiliated to PDM, acquired Romanian citizenship under a different name (Turcanu, Nani, and Basiul 2011).

[16] In 2012–2013 even the implementation of a visa-free regime with the EU did not seem imminent.

[17] While Romanian visas were cost-free, applicants had to prove bank funds of at least €500 (about 30 per cent of average per capita annual income in 2010).

[18] Neofotistos (2009) describes the same problems of an inefficient bureaucracy regarding acquisition of Bulgarian citizenship by Macedonians.

[19] Respondents noted that names had changed in the Soviet Union because of the requirement of having names listed in Cyrillic, rather than Latin, script [MD-56].

[20] The majority of deportations took place in 1940–1941 and in 1949 to Siberia and Kazakhstan (see Caşu 2010: 52–53).

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References

Agerpres (2013). *Corespondenţă: Scandal în parlamentul de la Chişinău din cauza judecătorilor Curţii Constituţionale care deţin şi cetăţenia română* [*Correspondence: Scandal in Parliament in Chisinau Because*

the Constitutional Court Judges Who Hold Romanian Citizenship]. Online: http://www.agerpres.ro/externe /2013/04/05/corespondenta-scandal-in-parlamentul-de-la-chisinau-din-cauza-judecatorilor-curtii-constitu-tionale-care-detin-si-cetatenia-romana-11-42-32 (accessed: 10 July 2014).

Aspinwall M. (2000). Structuring Europe: Powersharing Institutions and British Preferences on European Integration. *Political Studies* 48(3): 415–442.

Bakić-Hayden M. (1995). Nesting Orientalisms: The Case of Former Yugoslavia. *Slavic Review* 54(4): 917–931.

Brubaker R. (1992). *Citizenship and Nationhood in France and Germany*. Cambridge, MA: Harvard University Press.

Buchowski M. (2006). The Specter of Orientalism in Europe: From Exotic Other to Stigmatized Brother. *Anthropological Quarterly* 79(3): 463–482.

Caşu I. (2010). Stalinist Terror in Soviet Moldavia, 1940–1953, in: K. McDermott, M. Stibbe (eds), *Stalinist Terror in Eastern Europe: Elite Purges and Mass Repression*, pp. 39–56. Manchester: Manchester University Press.

Daddow O. (2013). Margaret Thatcher, Tony Blair and the Eurosceptic Tradition in Britain. *The British Journal of Politics & International Relations* 15(2): 210–227.

Diez (2015). *Zboară la Londra sau Bologna cu 50 de euro. Wizz Air lansează noi rute din Chişinău* [*Flights to London or Bologne, from 50 Euros. Wizz Air Launch New Routes from Chişinău*]. Online: http://diez.md/2015/ 06/16/zboara-la-londra-sau-bologna-cu-50-de-euro-wizz-air-lanseaza-noi-rute-din-chisinau/ (accessed: 3 May 2016).

Dumbrava C. (2014). *Nationality, Citizenship and Ethno-Cultural Belonging: Preferential Membership Policies in Europe*. Basingstoke: Palgrave Macmillan.

European Parliament (2010a). *Answer to a Written Question – EU Response to Massive Passport Issue by Certain Member States*. E7923/2010. Online: http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2010-7923&language=CS (accessed: 31 March 2016).

European Parliament (2010b). *Written Question – EU Response to Massive Passport Issue by Certain Member States*. E7923/2010. Online: http://www.europarl.europa.eu/sides/getDoc.do?type=WQ&reference=E-2010-7923&language=CS (accessed: 31 March 2016).

European Parliament (2010c). *Written Question Romanian Passports for Inhabitants of the Republic of Moldova*. E7524/2010. Online: http://www.europarl.europa.eu/sides/getDoc.do?type=WQ&reference=E-2010-7524&language=CS (accessed: 31 March 2016).

European Parliament (2013). *Written Question Trade in EU Passports*. E013318/2013. Online: http://www.europarl.europa.eu/sides/getDoc.do?type=WQ&reference=E-2013-013318&language=SK (accessed: 31 March 2016).

European Parliament (2014a). *Answer to a Written Question – Issuing Passports to Citizens of Non-EU Countries*. E000061/2014. Online: http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2014-000061&language=EN (accessed: 31 March 2016).

European Parliament (2014b). *Debates – EU Citizenship for Sale*. Online: http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+CRE+20140115+ITEM-017+DOC+XML+V0//EN (accessed: 1 April 2016).

European Parliament (2014c). W*ritten Question – Association Agreement with the Republic of Moldova*. E000061/2014. Online: http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+WQ+E-2014-009011+0+DOC+XML+V0//EN&language=en (accessed: 31 March 2016).

European Parliament (2014d). *Written Question – Issuing Passports to Citizens of Non-EU Countries*. E000061/2014. Online: http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+WQ+E-2014-000061+0+DOC+XML+V0//EN&language=it (accessed: 31 March 2016).

Ford R., Goodwin M. J., Cutts D. (2012). Strategic Eurosceptics and Polite Xenophobes: Support for the United Kingdom Independence Party (UKIP) in the 2009 European Parliament Elections. *European Journal of Political Research* 51(2): 204–234.

Gabrielatos C., Baker P. (2008). Fleeing, Sneaking, Flooding. A Corpus Analysis of Discursive Constructions of Refugees and Asylum Seekers in the UK Press, 1996–2005. *Journal of English Linguistics* 36(1): 5–38.

Gleissner M., Vreese C. H. (2005). News About the EU Constitution Journalistic Challenges and Media Portrayal of the European Union Constitution. *Journalism* 6(2): 221–242.

Greenslade R. (2005). *Seeking Scapegoats. The Coverage of Asylum in the UK Press*. Asylum and Migration Working Paper 5. London: Institute for Public Policy Research.

Halikiopoulou D., Vlandas T. (2016). Risks, Costs and Labour Markets: Explaining Cross-National Patterns of Far Right Party Success in European Parliament Elections. *JCMS: Journal of Common Market Studies* 54(3): 636–655.

Hall S. (2001). The Spectacle of the 'Other', in: M. Wetherell, S. Taylor, S. Yates (eds), *Discourse Theory and Practice: A Reader*, pp. 324–344. London: Sage.

Hansard (2013). *Daily Hansard – Westminster Hall, Bankbench Business: Immigration (Bulgaria and Romania)*. Online: http://www.publications.parliament.uk/pa/cm201213/cmhansrd/cm130422/halltext/130422h0001.htm (accessed: 4 April 2016).

Hansen L. (2006). *Security As Practice: Discourse Analysis and the Bosnian War (New International Relations)*. New York, NY: Routledge.

Hawkins B. (2012). Nation, Separation and Threat: An Analysis of British Media Discourses on the European Union Treaty Reform Process. *JCMS: Journal of Common Market Studies* 50(4): 561–577.

Ibrahim Y., Howarth A. (2016). Constructing the Eastern European Other: The Horsemeat Scandal and the Migrant Other. *Journal of Contemporary European Studies*, February 3, 2016. DOI: 10.1080/14782804.2015.1135108.

Iordachi C. (2002). Citizenship and National Identity in Romania: A Historical Overview. *Regio-Minorities, Politics, Society* 13(1): 3–34.

Iordachi C. (2009). Politics of Citizenship in Post-Communist Romania: Legal Traditions, Restitution of Natioanlity and Multiple Memberships, in: R. Bauböck, B. Perchinig, W. Sievers (eds), *Citizenship Policies in the New Europe*, pp. 177–210. Amsterdam: Amsterdam University Press.

Ipsos MORI (2016). *Immigration Is Now the Top Issue for Voters in the EU Referendum*. Ipsos MORI Political Monitor – June 2016. Online: https://www.ipsos-mori.com/researchpublications/researcharchive/3746/Immigration-is-now-the-top-issue-for-voters-in-the-EU-referendum.aspx (accessed: 13 January 2017).

Isin E. F., Turner B. S. (2007). Investigating Citizenship: An Agenda for Citizenship Studies. *Citizenship Studies* 11(1): 5–17.

Khaleeli H. (2016). 'A Frenzy of Hatred': How to Understand Brexit Racism. *The Guardian*, 29 June, https://www.theguardian.com/politics/2016/jun/29/frenzy-hatred-brexit-racism-abuse-referendum-celebratory-lasting-damage.

Knott E. (2015a). Generating Data Studying Identity Politics from a Bottom–Up Approach in Crimea and Moldova. *East European Politics & Societies* 29(2): 467–486.

Knott E. (2015b). What Does It Mean to Be a Kin Majority? Analyzing Romanian Identity in Moldova and Russian Identity in Crimea from Below. *Social Science Quarterly* 96(3): 830–859.

Knott E. (2016). *Strategic, Symbolic or Legitimate? Analyzing Engagement with Dual Citizenship from the Bottom–Up*, paper delivered at the conference titled *Strategic Citizenship: Negotiating Membership in The Age Of Dual Nationality*, Princeton, NJ, 7–8 March 2016.

Kosmarskaya N. (2011). Russia and Post-Soviet 'Russian Diaspora': Contrasting Visions, Conflicting Projects. *Nationalism and Ethnic Politics* 17(1): 54–74.

Krippendorff K. (2004). *Content Analysis: An Introduction to Its Methodology*. Thousand Oaks, London, New Delhi: Sage.

Kundera M. (1984). The Tragedy of Central Europe. *The New York Review of Books* 31(7): 33–38.

Kuus M. (2004). Europe's Eastern Expansion and the Reinscription of Otherness in East-Central Europe. *Progress in Human Geography* 28(4): 472–489.

Liebich A. (2009). Introduction: Altneulander or the Vicissitudes of Citizenship in the New EU States, in: R. Bauböck, B. Perchinig, W. Sievers (eds), *Citizenship Policies in the New Europe*, pp. 21–44. Amsterdam: Amsterdam University Press.

Light D., Young C. (2009). European Union Enlargement, Post-Accession Migration and Imaginative Geographies of the 'New Europe': Media Discourses in Romania and the United Kingdom. *Journal of Cultural Geography* 26(3): 281–303.

Marshall T. H. ([1950] 1998). Citizenship and Social Class, in: G. Shafir (ed.), *The Citizenship Debates: A Reader*, pp. 93–112. Minneapolis, MN: University of Minnesota Press.

Mogos A., Calugareanu V. (2012). *How to Buy EU Citizenship*. Online: http://euobserver.com/justice/117551 (accessed: 10 June 2014).

Mudde C. (2007). *Populist Radical Right Parties in Europe*. Cambridge: Cambridge University Press.

Neofotistos V. P. (2009). Bulgarian Passports, Macedonian Identity: The Invention of EU Citizenship in the Republic of Macedonia. *Anthropology Today* 25(4): 19–22.

Neuendorf K. A. (2002). *The Content Analysis Guidebook*. Thousand Oaks, London, New Delhi: Sage.

Neumann I. B. (1998). *Uses of the Other: 'The East' in European Identity Formation*. Minneapolis, MN: University of Minnesota Press.

Offe C. (1993). Disqualification, Retribution, Restitution: Dilemmas of Justice in Post-Communist Transitions. *Journal of Political Philosophy* 1(1): 17–44.

Ponsford D. (2015). NRS: Daily Mail Most Popular UK Newspaper in Print and Online with 23m Readers a Month. *PressGazette*, 26 February, http://www.pressgazette.co.uk/nrs-daily-mail-most-popular-uk-newspaper-print-and-online-23m-readers-month/.

Said E. (1979). *Orientalism*. New York: Vintage.

Semetko H. A., de Vreese C. H., Peter J. (2000). Europeanised Politics – Europeanised Media? European Integration and Political Communication. *West European Politics* 23(4): 121–141.

Shevel O. (2011). Russian Nation-Building from Yel'tsin to Medvedev: Ethnic, Civic or Purposefully Ambiguous? *Europe–Asia Studies* 63(2): 179–202.

Spiro P. J. (2007). *Beyond Citizenship: American Identity After Globalization*. Oxford: Oxford University Press.

Suveica S. (2013). 'Entering the EU Through the Back Door'?! Debates on Romanian Citizenship for Moldovans. *Eurolimes* 16 (Supplement): 272–284

The British Election Study Team (2016). *What Mattered Most to You When Deciding How to Vote in the EU Referendum? By Chris Prosser, Jon Mellon, and Jane Green*. Online: http://www.britishelectionstudy.com/bes-findings/what-mattered-most-to-you-when-deciding-how-to-vote-in-the-eu-referendum/#.WHkS8vntmko (accessed: 13 January 2017).

Todorova M. (2009). *Imagining the Balkans*. Oxford: Oxford University Press.

Tressell R. ([1914] 2004). *The Ragged-Trousered Philanthropists*. London: Penguin.

Turcanu A., Nani A., Basiul V. (2011). *Vladimir Plahotniuc, oligarh şi al treilea om în stat, are dublă identitate: una în Moldova, una în România* [*Vladimir Plahotniuc, Oligarch and the Third Man in the State, Has a Dual Identity: One in Moldova, One in Romania*]. Online: http://adevarul.ro/news/eveniment/vladimir-

plahotniuc-oligarh-treilea-om-stat-dubla-identitate-moldova-romania-1_50ad6e177c42d5a66394ff29/in-dex.html (accessed: 10 June 2014).

UK Home Office (2016). *Hate Crime, England and Wales, 2015/16*. Online: report-it.org.uk/files/hate-crime-1516-hosb1116.pdf (accessed: 13 January 2017).

Vink M. P., Bauböck R. (2013). Citizenship Configurations: Analysing the Multiple Purposes of Citizenship Regimes in Europe. *Comparative European Politics* 11(5): 621–648.

Waterbury M. A. (2014). Making Citizens Beyond the Borders. *Problems of Post-Communism* 61(4): 36–49.

Annex 1

Table 1. Table of sources for UK media coverage

	Headline	Source	Date
1.	Revealed: How 20 000 Indians Have Slipped into UK on Portuguese Passports... All Legally!	*Daily Mail*	17/01/2016
2.	Migrants Exploiting 'Passport Loophole' Jetting into UK – and There's NOTHING We Can Do	*Express*	21/12/2015
3.	Wizz Swizz; Loophole Opens Door EU to UK for Non-EU Workers	*The Sun*	20/12/2015
4.	Low Cost Jets Bring Moldova Migrants	*The Sun*	20/12/2015
5.	We Are a Mecca for Eastern Europe	*Express*	21/03/2014
6.	Russia's Nervous Neighbours	*Independent on Sunday*	09/03/2014
7.	Yes, I Welcomed them it. But the More They Come, the Faster We Will Head for EU Exit	*Mail on Sunday*	05/01/2014
8.	Passport to UK for Europe's Poorest; Passport Agreements Mean Free Movement Will Extend Far Beyond EU	*Daily Telegraph*	01/01/2014
9.	Ghost Towns Left Behind by Bulgarians Seeking Work	*Daily Telegraph*	01/01/2014
10.	Moldova the Border	*The Sun*	01/01/2014
11.	Non-EU Citizens Will Be Able to Work in Britain After Bulgarian Restrictions Lifted	*Daily Telegraph*	01/01/2014
12.	Hundreds of Thousands from Outside EU Could Head for UK in Passport Loophole	*Daily Mail*	31/12/2013
13.	Non-EU Citizens Will Be Able to Work in Britain After Bulgarian Restrictions Lifted	*Daily Telegraph*	31/12/2013
14.	Moldova on the Cusp of the EU Club	*Sunday Telegraph*	10/11/2013
15.	Gangsters to Flood UK	*Express*	04/11/2013
16.	Moldovan Conduit: How Alleged Hitman Was Said to Have Taken on London Hit	*Guardian*	09/04/2013
17.	Now Moldovans Plot a Move to Britain Using 'granny' Loophole	*Express*	22/03/2013
18.	Loophole Could Allow Thousands of Moldovan Immigrants to Enter Britain	*Daily Telegraph*	22/03/2013
19.	Moldovans 'Using Passport Loophole' Claims Tory Backbencher	*Independent*	21/03/2013
20.	Now the Moldovans Are Heading for Our Shores; Romanian 'Granny' Loophole Will Allow Migrants to Work in UK	*Sunday Express*	17/03/2013
21.	BACK DOOR TO BRITAIN; THE Sun Sunday INVESTIGATION Thousands of Moldovans Queue for Passports to UK in Euro Loophole	*The Sun*	14/10/2012
22.	Euro Jobs Con Boast	*Daily Star Sunday*	06/05/2012
23.	Time to Close the Border to Immigration	*Express*	08/01/2011

24.	I'll Get Hungarian Papers First Then Head for the UK. The Kids Are Already Watching Cartoons in English	*The Sun*	30/12/2010
25.	Bulgaria Opens EU Doors to 500 000	*Daily Mail*	24/09/2010
26.	Migrant Threat to Homes	*Express*	24/09/2010
27.	Life of Pain for the Farmer Who Sold His Kidney to Buy a House	*Times*	22/09/2010
28.	Millions Win Right to Enter Europe by Back Door... And Then UK	*Sunday Express*	15/08/2010
29.	Backdoor to Britain for 2 Million Migrants	*Daily Mail*	06/08/2010
30.	Moldovans Could Get a Passport to Britain	*Daily Telegraph*	19/07/2010
31.	1M Moldovans Head for Britain	*Express*	19/07/2010
32.	The Country Can't Cope	*Express*	19/07/2010
33.	Romania Opens EU Back Door to 1M Moldovans	*Sunday Times*	18/07/2010
34.	It's Time to Reconsider Our Membership of EU	*Express*	02/02/2010
35.	Now Moldovans Will Win the Right to Live in Britain	*Express*	02/02/2010
36.	It is Time Britain Took Back Control of Its Own Destiny; LEADER	*Express*	12/05/2009
37.	Britain Welcomes Million Moldovans	*Daily Star*	18/04/2009
38.	One Million of Europe's Poor Offered Way Into UK	*Express*	18/04/2009
39.	Moldova Threatens Europe's Eastern Overtures	*Financial Times*	17/04/2009
40.	Mob 'Boss' Held	*The Sun*	23/05/2008
41.	Moldovans Suspicious of Bigger Neighbour's Intentions	*Financial Times*	08/12/2007
42.	Drive to Emigrate Is Easing MIGRATION: About 2M Are Already Abroad and Earning Much Higher Wages	*Financial Times*	02/03/2007
43.	From New Europe to Old Europe by Coach – All Change at Cologne	*Times*	01/01/2007
44.	Romanians Get Key to Britain's Door	*Sunday Times*	31/12/2006
45.	Coming to Britain Next Week, the People Even Their Own Nation Is Glad to See the Back of	*Daily Mail*	28/12/2006
46.	How Many More Can Britain Take?	*Daily Mail*	27/12/2006
47.	Mail Impaled on Its Mania for Romania	*Observer*	15/10/2006
48.	Reid Signals End of Open-Door Policy on Migrants to Britain	*Daily Mail*	07/10/2006
49.	300,000 Moldovans Could Seek Work in EU	*Daily Telegraph*	06/10/2006
50.	Here Come the Moldovans	*Daily Mail*	06/10/2006
51.	Pouring in	*Daily Star*	06/10/2006
52.	Now 80 000 Moldovans Eye UK Move	*Mail on Sunday*	17/09/2006

Table 2. Table of coverage of other cases

	Headline	Source	Date	Country
1.	Malta's Golden Passport Scheme Draws Fresh Criticism	*Financial Times*	08/04/2016	Malta, Cyprus
2.	Not Romanian? No Problem, Here's an EU Passport: Agencies with Links to Russian Mafia Offer Back-Door Route to Millions	*Mail on Sunday*	30/11/2014	Romania, Hungary, Latvia
3.	Half a Million EU Passports Given Away to Eastern Europeans by Hungary which Allow them to Live in Britain	*Daily Mail*	21/06/2014	Hungary
4.	Britain's Borders and a Passport to Abuse	*Daily Mail*	21/06/2014	Hungary
5.	EU Citizenship for Sale to Non-Europeans in Bulgaria for As Little As £150 000	*Daily Telegraph*	14/03/2014	Bulgaria
6.	TOM UTLEY: Call Me Loopy but There's Something Mystical About a UK Passport. Flogging them to Oligarchs Just Feels Tawdry	*Daily Mail*	28/02/2014	UK
7.	Hundreds of Foreign Millionaires Apply for Maltese Passports that Give them the Right to Live in Britain – and Even to Claim Benefits	*Daily Mail*	20/02/2014	Malta
8.	Want to Buy Citizenship? It Helps If You're One of the Super-Rich	*Guardian*	10/12/2013	Malta
9.	Cash for Passports	*Financial Times*	10/12/2013	Malta
10.	Malta to Sell Citizenship for £500 000 with Buyers Allowed to Live and Work ANYWHERE in the European Union	*Daily Mail*	10/12/2013	Malta
11.	Maltese Passport and Life As an EU Citizen for Anyone with £546 000	*Daily Telegraph*	13/11/2013	Malta
12.	There Is No Sacrilege in Flogging EU Passports	*Financial Times*	13/10/2013	Malta
13.	The New Imperialism. How Brussels Bullies Budapest for not Conforming to 'European Values'	*Daily Mail*	10/04/2012	Hungary
14.	Now Is not the Time to Turn Our Backs on Enlightenment Values	*Guardian*	08/01/2012	Hungary
15.	Bulgarian Passport Farce Could Lead to New Immigrant Wave	*Daily Star*	25/09/2010	Bulgaria
16.	Passport Giveaway Opens UK Back Door: 2M More Hungarians Will Have Right to Work Here	*Daily Mail*	06/08/2010	Hungary