Regional citizenship regimes

Comparing ECOWAS and ASEAN

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Abstract

This thesis investigates the relationship between citizenship and regional organisations in the Economic Community of West African States (ECOWAS) and the Association of Southeast Asian Nations (ASEAN). Specifically, it studies variation in regional citizenship regimes, how regional actors interpret the notion of regional citizenship, and what these variations and interpretations mean for our understanding of regional citizenship regimes. The thesis takes a qualitative, comparative case study approach and draws on empirical data from official documents and 49 semi-structured interviews conducted with ASEAN and ECOWAS officials and staff from non-governmental organisations. The study is guided by a four-tired concept of citizenship regime that provides the analytical framework for the analysis and comparison of a legal citizenship regime (ECOWAS) and a non-legal citizenship regime (ASEAN).

The study is motivated by the increasing development and regulation of citizenship by regional organisations which create a new, 'added-on' membership status beyond national citizenship. As intra-regional movement is vast within many regions, these new citizenship statuses impact the lives of millions of people. In spite of their increasing importance, there is little research on regional citizenship regimes outside of the European Union (EU). The EU-dominance results in limited attention to informal and legally non-binding forms of regional citizenship and, thus, a limited understanding of the ways in which these forms of regional membership shape the formation of regional citizenship regimes.

The study presents three important findings: first, a high degree of legalisation is not a necessity for regional citizenship regimes. Second, even in cases where regional citizenship regimes can be characterised as having a higher degree of legalisation, other aspects, notably those that touching on identity and belonging, are considered equally important by those designing the regimes. Third, the level of socio-economic development in a region has a direct impact on how regional citizenship regimes are constructed. Consequently, this thesis makes a series of contributions which advance our understanding of regional citizenship regimes by illustrating the need for revising the criteria for what we consider a citizenship regime. It also provides a rare, in-depth comparative account of the assumptions upon which regional organisations base their citizenship regimes. In so doing, it contributes to our understanding of the ways in which political realities shape institutional design and citizenship policies in West Africa and Southeast Asia.

Keywords: regional citizenship, regional integration, community-building, regional organisations, comparative regionalism, ECOWAS, ASEAN

Contents

List of articles

This thesis consists of the Kappa and the following four articles:

I.   Weinrich, A. (2021). Varieties of citizenship in regional organisations: a cross-regional comparison of rights, access, and belonging. *International Area Studies Review 24*(4), 255-273.

II.   Weinrich, A. (2020). The emerging regional citizenship regime of the Association of Southeast Asian Nations. *Journal of Current Southeast Asian Affairs 40*(2), 201-223.

III.   Weinrich, A. (2023). Regional citizenship regimes from within: unpacking divergent perceptions of the ECOWAS citizenship regime. Accepted for publication in the *Journal of Modern African Studies*.

IV.   Weinrich, A. (2023). The ECOWAS and ASEAN citizenship regimes: comparing regional memberships. Under review in the *Third World Quarterly*.

List of acronyms

ACWC	ASEAN Commission on Women and Children
AHRD	ASEAN Human Rights Declaration
AICHR	ASEAN Intergovernmental Commission on Human Rights
ASEAN	Association of Southeast Asian Nations
CARICOM	Caribbean Community
CAN	Andean Community
CSO	Civil Society Organisation
EAC	East African Community
ECOWAS	Economic Community of West African States
EU	European Union
ICMPD	International Centre for Migration Policy Development
ILO	International Labour Organisation
IOM	International Organisation for Migration
NGO	Non-Governmental Organisation
SADC	South African Community
SNAP	Statelessness Network Asia Pacific
UN	United Nations
UNDP	United Nations Development Programme
UNHCR	United Nations High Commissioner for Refugees

Acknowledgments

I first became aware of the benefits of being recognised as a European citizen during a skiing holiday in France in 2007. When needing to see a doctor, due to an accident that injured my hand, I found out that instead of having to pay for this visit out of my own pocket, the medical invoice was billed directly to the Danish state which provides health insurance for all national citizens. Later, my European citizenship status aided my academic studies outside of Denmark. However, it was not until I decided to explore this membership status in West Africa, as part of my master's dissertation, that I began wondering how these dynamics unfold and play out in other parts of the world. Investigating ECOWAS community citizenship, at the time that the UNHCR's global #IBelong Campaign to End Statelessness was initiated in the region, made me want to continue exploring the dynamics, benefits, and challenges of regional citizenship in West Africa and beyond. I thus set out on my PhD project with one overarching question in mind: how can we make sense of citizenship in a regional context? Over the years, this question more clearly defined the scope of my research and became the subject of this Kappa and the four journal articles.

Writing this thesis would not have been possible without my family, friends, colleagues, and mentors, and I want to take this opportunity to share some notes of thanks. Professor Scott Newton was the first person who sparked my academic interest in citizenship and who, in serving as my MSc supervisor, encouraged me to pursue the investigation of regional citizenship formation in the West African context. When turning the insights from my master thesis into a PhD proposal, Professor Michael Wintle provided valuable support. Your encouragement and your academic expertise on regional identity have accompanied me during my PhD project, and I want to thank you for having taken the time to engage with my research idea back in 2017.

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A special thank you to my mock opponent and third reader: Professor Espen Daniel Hagen Olsen, your careful reading and detailed suggestions on how to improve my thesis were invaluable. Thank you for your insights and encouragement. Professor Helena Lindholm, your thoughtful and detailed feedback helped me transform an unfinished text into a streamlined PhD thesis. Your insights helped me finalise this five-year project in the best way possible. Dr Redie Bereketeab, thank you for serving as my third committee member. Your work has inspired my writings and fostered my curiosity about citizenship in Africa. Moreover, I would like to express my gratitude to Professor Rainer Bauböck for having agreed to serve as my opponent at my PhD defence. In 2016, when I began formulating my early thoughts on what would become my PhD project, your work on transnational citizenship and the principle of stakeholder citizenship were some of my first encounters with the academic debates on citizenship beyond the nation-state. Your work has remained an immense inspiration, and I greatly appreciate the opportunity to discuss my work with you.

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Introduction

In January 2019, in the office of Singapore's representative to the ASEAN Intergovernmental Commission on Human Rights (AICHR), Ambassador Barry Desker and I discussed the outcomes of Singapore's ASEAN chairmanship which had just ended. Besides establishing a regional response mechanism to the increasing digital insecurity and the threat of terrorism in the region, ASEAN had continued its work on institutionalising the objectives declared in the *ASEAN Community Vision 2025: Forging Ahead Together*, such as 'deepening the integration process to realise a rules-based, people-oriented, people-centred ASEAN Community, where our peoples enjoy human rights and fundamental freedoms, (…) the benefits of community building, reinforcing our sense of togetherness and common identity' (ASEAN 2015, 13). Under this framework, policy initiatives on the ASEAN identity agenda, its connectivity masterplan, and on political, economic, and social integration were rolled out during the year. While discussing these regional integration initiatives and the gradual 'rights-turn' ASEAN had taken since the creation of the ASEAN Charter in 2008 and its regional human rights body, AICHR, in 2009, Desker reflected on the role of citizenship within the broader community-building agenda:

> The question of citizenship is challenging because each country is still building a national citizenship after colonialism. National boundaries are still debated, and it is still difficult to ensure nationality. We have a fundamentally different approach to citizenship building, and to most people, identification is with a village, an ethnic group, or a linguistic group. Therefore, one's identification cuts across national borders and you could therefore say that we have regional memberships and identifications – informal ones – between ASEAN citizens. But, instead of using the citizenship term, we use the less politically loaded concept of ASEAN identity to capture the development of a regional community (Interview, Barry Desker, 31 January 2019, Singapore).

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Later that same year, in an office of the Department of Social Affairs and Gender at the ECOWAS Commission in Abuja, Nigeria, I had a similar conversation about citizenship, regional integration, and community building with Abimbola Oyelohunnu, Programme officer on Labour Migration. When discussing this topic in the context of ECOWAS and West Africa, Oyelohunnu explained that:

> ECOWAS community citizenship means that you belong, not only to a country but to the entire region. Therefore, it indicates rights and that you have responsibilities, and that we should be able to access basic human rights as citizens of the region. It also re-enacts the relationship between people that existed before colonialism, and that is the reason why it was included in some of the first protocols – because it establishes a West African community and membership (Interview, Abimbola Oyelohunnu, 8 November 2019, Abuja).

The type of regional membership discussed during the interviews with Berry Desker and Abimbola Oyelohunnu has commonly been referred to as regional citizenship, community citizenship, or union citizenship, depending on the social and political context. Based on extensive research on the EU citizenship regime (Jenson 2007; Meehan 1993) and European citizenship practices (Wiener 1998; Olsen 2012), this type of citizenship is neither conceptualised as national membership nor as a cosmopolitan status. Rather, it implies membership defined within the social and political boundaries of a regional community (Cabrera and Byrne 2021). By defining the premises for membership beyond a single nation-state, regional citizenship falls within the broader category of memberships which have evolved more recently within or beyond the national political boundary (Bauböck 2010; Hettne 2000; Hanagan and Tilly 1999; Soysal 1994; Wintle 2005a).

As people move across national borders, the premises for citizenship and membership shift. Today, regional organisations across the world are increasingly developing and regulating memberships which transcend a national polity, thereby creating a new, 'added-on' membership status (Cabrera and Byrne 2021; Bianculli and Hoffmann 2017). However, regional citizenship is not disconnected from the member states, rather it is a membership status which is obtained from nationality and from being recognised as a national citizen by a nation-state polity. Consequently, this type of membership is not defined as post-national but is deeply connected with other citizenship statuses at the national level (Bauböck 2010; Strumia 2017). This connection makes regional citizenship a multileveled concept of deeply connected and overlapping 'layers'.

In this thesis, I study how the concept of citizenship is understood within regional organisations. In particular, I approach this topic by conducting a comparative case study of the regional citizenship regimes of ECOWAS and ASEAN. In this comparison, I investigate how regional organisations outside the global North construct citizenship regimes, how such regimes vary across socio-political contexts, how regional actors interpret the notion of regional citizenship, and what these interpretations might mean for how we theoretically and conceptually understand regional citizenship regimes.

Research problem

Citizenship denotes rights, duties, statuses, identities, and access to participation in a political community (Bloemraad 2018; Soysal 1994; Olsen 2012; Meehan 1993). It is not a neutral concept; rather, it significantly influences the lives of people in nation-states and determines the opportunities they have, both when citizenship is obtained and when it is lacking. Citizenship status defines the formal and informal relationship between people and communities. Consequently, it creates subjects of a polity and can be used to determine who belongs within the socio-political boundaries of a community (Olsen 2012; Hettne 2000). Citizenship as a concept is archaic, and at the same time, it plays an essential role in modern societies. Because it determines who belongs to a community, it has a violent and exclusive side and can be used as a tool to marginalise and subject people. In colonised states, citizenship was used in this fashion to create 'citizens' and 'subjects' (Mamdani 1996).

At the same time, it is also an inclusive concept used to integrate people into a community by allowing them to claim certain rights and to access opportunities that would not be open to them otherwise (Bloemraad 2018). Therefore, citizenship as a membership status means being recognised (or not) as a political community member, and it thereby establishes physical, legal, and emotional boundaries between people (Kochenov 2019; Brubaker 1992; Soysal 1994). Although citizenship 'means different things in different contexts' (Wiener 1998, 3), and there are conceptual and theoretical differences in how this concept is understood in different literatures, citizenship commonly denotes certain rights, political access, and a sense of belonging (Wiener 1998).

Citizenship has historically been viewed as a crucial element of state-building and institution-building (Jenson 2007; Tilly 2005; Wiener 1998; Hettne 2000). Most scholars agree that in modern Western, liberal history, citizenship is linked primarily to the nation-state and implies a notion of stateness (Tilly 2005; Kochenov 2019). During the 1980s and 1990s, these common assumptions were gradually challenged when citizenship was

reconceptualised within and beyond the nation-state boundary (Sassen 2005). With increasing movement of people across borders, globalisation, and various new forms of interconnectivity between people and states, the predominant notion of citizenship as membership in a *national* political community began to change (Joppke 2007; Hettne 2000). Today, citizenship is formed in local, national, regional, and global communities.

When scholars think of citizenship membership beyond sovereign nation-states, they most commonly refer to the case of the European Union citizenship regime (Strumia 2017; Cabrera and Byrne 2021). They do so with good reason. In the literature on citizenship formation beyond a nation-state, the EU citizenship regime stands out as the predominant case. Over the years, scholars have conducted research on the making of the EU citizenship regime and on challenges to it (Jenson 2007; Wiener 1998; Kochenov 2017; Soysal 1994; Olsen 2012; Meehan 1993). Moreover, studies have also examined specific aspects of the EU citizenship regimes by investigating, for example, new forms of cross-border or transnational citizenships in Europe (Bauböck 2003; Olsen 2012) and European citizenship practices (Wiener 1998; Soysal 1994; Meehan 1993). These studies have provided insights into this phenomenon and have broadened our theoretical and conceptual knowledge of citizenship formation in regional organisations.

This thesis finds inspiration in the extensive literature on the EU citizenship regime. That said, it also identifies two main knowledge-gaps in the current literature, which it seeks to engage with in order to further develop our understanding of regional citizenship regimes and to establish a theoretical account of citizenship beyond the EU. First, there are only very few empirical studies of regional citizenship regimes other than that of the EU. Second, there has been little attention to informal and non-legal forms of regional citizenship and the way in which these forms of regional citizenship shape regional citizenship regimes. The first knowledge-gap is primarily empirical and the second is of a more conceptual nature.

Concerning the first knowledge-gap, one of the consequences of the focus on the EU citizenship regime is that studies of regional citizenship regimes have often been informed by theories of European integration and liberal intergovernmentalism (Strumia 2017; Jenson 2007; Wiener 2007, 2017). Moreover, the research on the case of the EU has informed the understanding that regional citizenship regimes are formally defined as a legal membership status in an organisation's institutional framework (Strumia 2017; Kochenov 2019). This point seems to have influenced the case selection criteria of scholars who – when not studying the EU – remain primarily interested in exploring regional organisations in which citizenship is a legally defined

membership status (Strumia 2017; Giupponi 2017; Neuvonen 2019). However, we know from the EU that regional citizenship practices often exist and play out in various ways before being formalised at the institutional level (Meehan 1993; Olsen 2012; Wiener 1998)[1].

This leads to the second knowledge-gap, which arises due to the limited number of studies of regional citizenship regimes that are not legally defined but play out through various institutional norms and practices and through the establishment of citizenship and citizenship-related policies. Despite research that has shown that citizenship was practiced in the European community prior to receiving a legal status through the 1992 Treaty of Maastricht (Jenson 2007; Meehan 1993; Wiener 1998), the equating of regional citizenship with a legal status enshrined in the institutional framework of a regional organisation remains prevalent. However, as indicated in the section above, shifts in citizenship studies have meant that citizenship is no longer only conceptualised narrowly as membership in a community within the borders of a nation-state or legally enshrined membership in a regional community.

In fact, in trying to explain European citizenship and its link to the formation of a European citizenship identity, Gerard Delanty (2005) argued for four constitutive components: a collective 'we-feeling', collective consciousness, belonging, and group attachments. Delanty's four-component conceptualisation of European citizenship identity is significant because it does not include formal recognition or mechanisms for legally ensuring these bonds between people in a community as a constituent part of regional citizenship. This indicates that membership must neither be legal nor formalised to develop and thrive (Elumbre 2019). Other scholars have also argued that citizenship should be understood as more than a legal membership status, for instance as shared practices and beliefs (Habermas 1994) or as a presupposition of mutual cultural understandings that emphasise cohesion and coexistence within a society (Hirata 2015).

Yet despite these accounts, the legalisation and formalisation of citizenship have continued to be considered a prerequisite for the analysis of different regional citizenship regimes (Elumbre 2019; Strumia 2017; Cabrera and Byrne 2021). Although a growing body of work has begun identifying important dynamics in the development of regional citizenship regimes beyond the EU, these studies are few and far between and have remained narrowly focused on the significance of single cases (Cabrera and Byrne 2021).

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[1] Scholars (Wiener 1998; Olsen 2012) have shown that citizenship first appeared in the EU's agenda in the 1970s, two decades before it was legally defined as a membership status. Early forms of regional citizenship practices were created on the formulation of specific citizenship-policies such as social policies (Meehan 1993) or other 'special rights' and 'passport policy' (Wiener 1998, 8).

CHAPTER 1

This thesis is motivated academically by the limited studies of regional citizenship regimes and our inadequate understanding of how different formal and informal citizenship regimes are formed and developed by regional organisations. Thus, the thesis is situated within an evolving body of literature which investigates forms of citizenship in regional organisations beyond the EU, and, in particular, in South America (Cernadas 2013; Fornalé 2017; Giupponi 2017), Africa (Ukaigwe 2016; Obi 2012; Mengisteab and Bereketeab 2012; Bappah 2013), the Gulf region (Kinninmont 2013), and Asia (Cabrera and Byrne 2021; Hirata 2015). Moreover, the thesis is motivated by the practical importance of citizenship regimes, which impact millions of people in the two regions I investigate in this thesis. As Onyinye Onwuka, Head of the Political Affairs and International Cooperation Division of the ECOWAS Commission, notes:

> After colonialism and when our countries had gained independence, many communities had been divided by colonial borders. This forced families and groups to be divided against their wishes and will. But the early ECOWAS protocols that created the possibility of moving across borders very easily and eliminated visas made it more possible for these groups to again live closer together even though we are still divided by national borders. Now these borders are less restrictive to us. When I travel in the region, I use my passport and everyone can see that I am an ECOWAS citizen, and I feel at home and that I belong (Interview, Onyinye Onwuka, 12 December 2019, Abuja).

Onwuka's statement illustrates the significance of regional citizenship policies. They are important because they have the potential to improve the everyday lives of millions of people. This becomes even clearer when considering that the majority of cross-border movement takes place within the same region. The UN estimated that in 2020 nearly 90% of the 7.4 million migrants living in West Africa were citizens of another country of the region (UN 2020). Before regional citizenship policies were introduced in West Africa, elaborate visa and passport regulations, as well as the need for people to obtain work permits in each country of the region, restricted intraregional movement and resulted in increased numbers of vulnerable, undocumented migrants and trafficked persons (Adepoju 2005).

The International Labour Organisation (ILO) has estimated that about 11.6 million documented workers in Southeast Asia reside in a neighbouring ASEAN country (ILO 2018)[2]. These people are often particularly vulnerable in terms of social security and basic rights as they are neither eligible for social protection and benefits in the host country where they work nor in their country

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[2] However, it should be acknowledged that this is an estimation and leaves out a vast number of undocumented migrant workers throughout the region.

of origin since they have left it permanently or for an extended period of time. I noticed the salience of this issue on several occasions during my field research in Southeast Asia, and I was reminded about the important role ASEAN plays in providing a regional framework for social security of ASEAN migrant workers. During a conversation with Pitchanuch Supavanich, Senior Officer of the Labour and Civil Service Division at the ASEAN Secretariat, she reflected:

> In our region, people move around for work, but it has always been difficult to provide the necessary protection for these people. In my family, I have many relatives who live in other ASEAN countries, but they were not protected or helped. For example, my brother had to leave his work and come home because his child got ill, and they could not get basic medical help abroad. It was difficult especially as I worked for the ASEAN department that tries to help migrant workers and their families. It is still difficult today, but our new consensus, and also the recent work of AICHR and ACWC[3] that work on improving the social protection rights of especially migrant workers, women, and children, really has the potential of helping many people in the region. The ASEAN consensus[4] also helps us at the secretariat to work more effectively and with one voice on these issues, and I am very happy that I can do that now (Interview, Pitchanuch Supavanich, 11 January 2019, Jakarta).

In this thesis, I analyse how regional organisations create regional citizenship regimes. At times, this necessitates a thorough assessment of previous theoretical and conceptual debates and technical policies of the two organisations. This is important in its own right because we still understand little about citizenship creation at the regional level outside the EU[5]. But in the midst of theoretical discussions and the analysis of policies and institutional procedures, it can be easy to lose sight of the significance of these questions outside of academia and the importance of questions of regional citizenship for millions of people across the world. As the statements by Onwuka and Supavanich show, the importance of these questions is hard to overstate. It is important to keep this in mind to appreciate not only the academic relevance but also and especially the significance of this thesis. It is my hope that it will not only contribute to academic debates but that my analysis of the two regional citizenship regimes will be helpful to those people I interviewed who actively and passionately work on the creation of regional citizenship policies that affect so many people in West Africa and Southeast Asia.

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[3] These two institutions are the ASEAN Intergovernmental Commission on Human Rights (AICHR) and the ASEAN Commission on Women and Children (ACWC).

[4] The consensus which Pitchanuch Supavanich refers to is the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (ASEAN 2018).

[5] Later in this chapter, I present the contributions of this thesis.

CHAPTER 1
Research aim and questions

This thesis aims to contribute new knowledge on processes of citizenisation[6] and insights into how regional forms of citizenship are created by regional organisations. The thesis sheds light on how regional organisations establish new forms of membership through the building of regional citizenship regimes and examines the nuances of these regime formations. The creation of a regional citizenship regime implies a reconfiguration of *de jure* and *de facto* membership status, which alter the relationship between people and a sovereign nation-state by drawing new membership boundaries that are determined by regional organisations. In pursuit of these ambitions, the thesis seeks to answer the following research questions:

> *1. How do citizenship regimes constructed by regional organisations vary?*

> *2. How do regional actors interpret the notion of regional citizenship?*

> *3. What are the broader theoretical and conceptual implications resulting from the variation of regional citizenship regimes and the diverse interpretations of citizenship among regional actors?*

The first research question guides an empirical analysis of different regional citizenship regimes, investigating how these have been constructed by regional organisations, and how such citizenship formations vary. Thus, the focus of the first research question is on describing the different regional citizenisation processes and examining how they have informed the formation and development of different forms of regional citizenship. The comparative analysis sheds light on the differences and similarities in regional citizenship regimes across socio-political contexts to identify potential patterns and trends. The findings link to the second research question, which guides an empirical exploration of regional actors' understandings of citizenship and how they interpret citizenship in their specific socio-political contexts. Addressing this question necessitates a conceptual discussion about citizenship interpretations at the regional level, by regional organisations, and the actors involved in constructing regional citizenship regimes. Lastly, the third research question asks about the theoretical and conceptual implications of the first and second research question findings for our understanding of regional citizenship regimes.

I examine the three research questions by comparatively exploring two main cases: the regional citizenship regimes of ECOWA and ASEAN. I speak

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[6] Citizenisation is a term which implies a continuing building of citizenship, understood as a relationship between citizens and a political entity (Auvachez 2009).

to and explore the research questions in four separate articles. Article 1 maps out the variation of citizenship in eight regional organisations and conducts a comparative exploration of the ways in which regional organisations have established citizenship and citizenship-related policies. Article 2 examines the institutional initiatives leading to the emergence of an informal, regional type of membership and empirically explores the development of an atypical regional citizenship regime, i.e., the ASEAN citizenship regime. Article 3 unpacks the diverse institutional perceptions of a regional citizenship regime from the view of the actors involved in the citizenisation process. Article 4 provides a comparative case study analysis of regional forms of membership by exploring similarities and differences between the legal ECOWAS citizenship regime and the non-legal ASEAN citizenship regime to identify patterns and trends across the different institutional and socio-political contexts.

The thesis approaches the comparative study of regional citizenship regimes from the perspective of the regional actors and the two organisations at large. I understand *regional actors* as all main stakeholders operating at the regional level in these organisations. Thus, although representatives to the ASEAN Intergovernmental Commission on Human Rights (AICHR) are selected nationally to hold this position, they are perceived as regional actors in their capacities as representative to AICHR. Moreover, regional actors thus imply the officials working at the ECOWAS Commission and the ASEAN Secretariat and in their affiliated bodies. The regional organisations, the actors, and the citizenship initiatives are therefore the primary focus of this thesis. However, I acknowledge that regional organisations are not monolithic entities, but social and political constructs subject to ongoing change and (re-)formation, influenced by contextual and intersubjective factors such as the political *status quo* of member-states. Thus, they are themselves actors made up of other actors, or, put differently, they are regional organisations with actorness features (Van Langenhove 2011). In this way, regional organisations can 'be more than just the sum of their parts' and are 'established and consolidated through practices, discourses and institution-building' (Mattheis and Wunderlich 2017, 724). Consequently, in this thesis I treat ECOWAS and ASEAN as socially constructed, politically consolidated entities with actorness features.

Researching the ECOWAS and ASEAN citizenship regimes also necessitates an examination of the citizenship policies of the regional organisations and their affiliated institutions, for instance the ECOWAS Commission and the ASEAN Intergovernmental Commission on Human Rights (AICHR). I understand *institutions* as central components of regional

organisations, which directly impact the cohesion of an organisation and work under the overall organisational framework, according to specific formal and informal norms, rules, and principles (Jetschke 2017). Moreover, institutions can be either informal, preferring conventions and memoranda of understanding (MOAs), or formal, and thus preferring legal rules and procedures (Mattheis and Wunderlich 2017).

My examination of the ECOWAS and ASEAN citizenship regimes draws on a vast number of citizenship and citizenship-related policies and relevant institutional initiatives. *Citizenship policies* are institutional policies established by either ECOWAS or ASEAN with the specific purpose to define, develop, or institutionalise the organisations' citizenship regime. The 1979 Protocol Relating to the Free Movement of Persons, Residence and Establishment (ECOWAS 1979) and the 1982 Protocol Relating to the Definition of Community Citizens (ECOWAS 1982) are both examples of citizenship policies. However, due to the informality of the institutional designs of the organisations, especially in the case of ASEAN (Jetschke 2017; Cabrera and Byrne 2021), I also draw on a number of *citizenship-related policies*. This term is used to label and categorise policies that are focussed on aspects or dimensions of citizenship, such as specific rights or types of accessibility. For instance, the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (ASEAN 2018) and the ASEAN Human Rights Declaration (ASEAN 2012) are examples of policies which focus on constitutive dimensions of a citizenship regime and are therefore vital for the comparative analysis.

Research approach

This thesis adopts a research approach that draws on both interpretivist and constructivist epistemological approaches to knowledge. I acknowledge that these approaches or paradigms are not the same and cannot therefore be used interchangeably. However, I draw inspiration from both approaches because they share the same ontological position of understanding the world as consisting of multiple realities (Bryman 2012). Importantly, they differ in terms of their epistemological stances, as the constructivist approach commonly focuses on how realities are *constructed* whereas the interpretivist approach seeks to understand how realities are *experienced* (Barbehön 2020). Both their mutual ontological positions and their different epistemological perspectives are important for the research approach of this thesis. The constructivist approach helps me to understand how regional citizenship regimes are constructed within a specific context or reality, and how they can actively and continually develop. On the other hand, because the interpretivist

approach is commonly more concerned with the experience and perception of a reality, this approach helps illuminate how ECOWAS and ASEAN, as actors, understand and experience their regional citizenship regimes.

In taking an interpretivist/constructivist approach, I also emphasise that the thesis relies on the assumption that knowledge is a social construction that is empirically contextualised and subject to ongoing redefinitions and negotiations (Schwandt 1998; Bryman 2012). The thesis uses a qualitative data-generating method, which is case-oriented and relies on the information provided by interviewees and their understandings and perceptions of the phenomena studied. Consequently, knowledge is produced through an analysis of the understandings, perceptions, and experiences of what constitutes regional citizenship regimes for the organisational actors, as stated in interviews and written in the institutional documents (Schwandt 1998).

In line with the interpretivist/constructivist research approach, I relate the empirical research and theoretical perspectives on regional citizenship regimes through the use of the *abductive* reasoning (Blaikie 2007). In this way, theory and empirics inform the study neither through purely inductive or deductive reasoning, but through the use of the 'researchers' categories, through the participants' own accounts of everyday activities, ideas, and believes' (Ormston et al. 2014, 7). As noted by Norman Blaikie (2007), abductive reasoning implies developing descriptions and constructing theory by describing the activities and meanings of the actors of a study and deriving categories and concepts that can form the basis of an understanding of the phenomena studied. Abductive reasoning, furthermore, affects the scope of the research project and research questions. The first and second research question empirically explore the construction and variation of regional citizenship regimes and ask how these are interpreted by regional actors. Both of these questions are linked to the logic of abductive reasoning. In other words, the data gathered through empirical observations helped identify concepts and categories, which in turn allowed me to suggest new understandings of the concept of regional citizenship regimes, in particular, and the theoretical understanding of citizenship in general.

Although the conceptual framework builds on existing research and theoretical understandings, it does not follow a fixed template but was carefully adapted to the contextual setting of the cases. This approach makes it possible to 'move' between the empirical observations during field research and the theoretical and conceptual understandings in the literature. Thus, theory and research mutually reinforce each other in this study. The empirical data gathered during two periods of field research was used to compare and contrast the understandings of regional citizenship regimes during the research

process, thus informing the study's outcome and the theoretical discussion. Consequently, abductive reasoning makes it possible to apply the conceptual framework to the two cases while maintaining flexibility and continually adapting to the actors' perceptions and their social and political contexts.

Limitations and delimitations

This thesis focuses primarily on the ways in which ECOWAS and ASEAN have constructed regional citizenship regimes and how these regimes differ. This focus makes it possible to illustrate how regional organisations create and develop institutional citizenship initiatives and thereby establish regional citizenship regimes that transcend the borders of a nation-state community. The three research questions are pursued in four articles analysing the two regional citizenship regimes. In particular, they examine how the organisations have constructed regional citizenship regimes (articles 2 and 3), how these vary (articles 1 and 4), how regional actors interpret citizenship (articles 2 and 3), and what these institutional interpretations mean for the broader understanding of the concept of citizenship regimes (article 4). The empirical material analysed in the articles consist of institutional documents, for instance agreements and protocols; a number of other written sources, such as reports, declarations, and action plans; as well as transcripts from semi-structured interviews with officials working at ECOWAS and ASEAN and staff from international- and non-governmental organisations that engage with the regional organisations and/or their citizenship policies.

Moreover, the thesis studies how ECOWAS and ASEAN have constructed different types of regional citizenship regimes. The study was influenced by differences between the governance structures of ECOWAS and ASEAN and practical limitations. I would have preferred to conduct interviews with more institutions and affiliated bodies of ASEAN and ECOWAS. However, it was challenging, at times, to gain access to interviewees who wanted to partake in the study and the practicalities of moving across the regions to conduct the interviews also rendered this impossible. Thus, I decided to focus primarily on the institutional actors of the ASEAN Secretariat and the ECOWAS Commission, as the departments under these governance bodies are responsible for tasks relating to the definition and development of citizenship and citizenship-related policies, such as the right of movement, social security, human rights, and the institutional establishment of a regional identity. However, I did obtain data from interviews conducted with affiliated institutions and departments, especially those of particular significance for my research questions, such as the ASEAN Intergovernmental Commission on Human Rights.

Furthermore, I made some theoretical and analytical choices pertaining to the research scope and objectives. In the study, I concentrate on the institutional definitions, formations, and developments of regional citizenship regimes, not the implementation of such regimes nationally or their effects (and lack thereof) on the daily lives of regional citizens. Moreover, while asking how regional actors interpret citizenship, and how these interpretations impact the notion of regional citizenship regimes, I refrained from including all relevant actors in this study. Instead, I chose to narrowly focus on the regional organisation and their institutional actors when analysing understandings of citizenship. I acknowledge that in order to gain a more comprehensive understanding of all aspects of the regional citizenship regimes, including their functions, I could have included perspectives of other relevant actors, such as the national governments and states which are facing the challenges of implementing the citizenship regimes, and especially the perspectives of the regional citizens themselves, who are governed by the policies proposed by ECOWAS and ASEAN. However, this, too, was not feasible within the scope of this study[7]. Thus, the choice of my institutional perspective necessarily entailed a moral dilemma with respect to whose perspectives and insights to include and exclude. I actively chosen to study only the institutional, 'top-down' perspectives and understandings of the two citizenship regimes in order to gain a comprehensive and in-depth knowledge on citizenship in regional organisations.

This thesis, then, is not a comparative study of regional citizenship from the perspectives of the citizens but focusses, instead, on the study of regional citizenship regimes 'from above'. This limitation touches upon the implications of studying policies and regional citizenship regimes 'top-down'. The objective of the thesis was to understand the citizenship regimes of ECOWAS and ASEAN from an institutional point of view. Thus, while examining the institutional policies and initiatives on citizenship tells us something about how the organisations govern people across national boundaries, which thereby has an important impact on people's lives, it does not include their perspectives in the analysis of the citizenship regimes. However, I have tried to gain a critical and nuanced perspective on the citizenship regimes by conducting interviews with partner organisations, international organisations, and NGOs, which often take on more critical roles than the regional organisations themselves. Combining the interview material from the ECOWAS and ASEAN officers and the staff of the partner organisations in this way helped me gain an insight into the institutional events

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[7] In chapter 5 I reflect on directions for future research.

and discussions ahead of making certain policies, and the benefits and drawbacks they posed.

Contributions to knowledge

The thesis makes important contributions to our understanding of the ways in which regional organisations construct regional citizenship regimes and how these vary. More specifically, it presents empirically grounded data on how regional actors who work on citizenship regime policies understand and interpret notions of citizenship, and how these interpretations impact certain regional citizenship regime designs and their institutionalisations. This is a crucial empirical contribution, particularly because previous research has focused primarily on the case of the European Union citizenship regime (Jenson 2007; Wiener 1998; Olsen 2012; Meehan 1993) and has largely refrained from substantially investigating how other regional organisations, with vastly different internal socio-political dynamics, governance structures, and historical legacies, create types of regional citizenship regimes (although see these exceptions: Cabrera and Byrne 2021; Obi 2012). This thesis helps fill this gap in the existing literature by drawing on cases from Africa and Asia and by presenting a novel South-South comparison.

The thesis is significant for the broader field of peace and development research in several ways. First, citizenship studies have been interconnected with development research, particularly concerning the role of citizenship (rights) in securing equality, aiding poverty eradication, and protecting indigenous rights (Kontinen and Onodera 2015; Lister and Pia 2008; Lazar 2012). It has also had a significant role in peace and conflict research (Manby 2009; McGee 2014; Williams 2015). Although a majority of the secondary literature used in this thesis is rooted in the fields of international relations, sociology, and citizenship studies, the thesis also contributes to debates in peace and development research by studying citizenship formation in socio-political contexts that have been shaped by the use of citizenship as a tool for colonial violence, peacekeeping, and state-formation (Mamdani 1996).

Second, my empirically informed understanding of how regional citizenship regimes are constructed in the two regions will contribute to broader debates on economic development (Chang 2012; Aminzade 2013), inclusion and belonging (Yuval-Davis et al. 2006; Castles and Davidson 2000), and regional stability and peace (Bah 2010; Mengisteab and Bereketeab 2012). Citizenship as a concept, a norm, and a practice can be used as a tool for inclusion and exclusion. Thus, understanding how new types of citizenship are constructed as part of an organisation's community-building and regional

integration agenda helps advance the broader debates on integration which are relevant to peace and development research (Tiessen 2011; Obi 2012).

Besides speaking to these broader debates in peace and development research, the thesis contributes knowledge on the regional actors involved in the making of regional citizenship regimes and adds to recent knowledge-building on the relationship between institution building and citizenship formation in and by regional organisations (Neuvonen 2019; Cabrera and Byrne 2021; Jenson 2007; Baba 2016; Elumbre 2019; Fourot et al. 2018; Mengisteab and Bereketeab 2012; Vink 2017). In particular, by showing how institutional milestones and policies have fostered the emergence of a regional citizenship regime in ASEAN (article 2), the thesis demonstrates how the ASEAN community-building agenda and the organisation's rights-turn – which explicitly took place after the formation of the ASEAN Charter in 2008 – increasingly and intentionally links the establishment of citizenship-related policies to the continued construction of institutions in the organisation, such as the AICHR in 2009 and the ACWC in 2010. The thesis also makes novel empirical contributions to this debate by showing how the formation of citizenship-related institutions, such as a community court or a free movement department, and their daily work impact the formulation and institutionalisation of regional citizenship regime policies in West Africa (article 3).

The thesis, furthermore, makes an empirical contribution by exploring the construction of regional citizenship regimes in socio-political contexts which have not received much academic attention (Obi 2012; Ukaigwe 2016; Cabrera and Byrne 2021) (articles 1 and 4). In particular, the thesis contributes novel data obtained empirically through the analysis of written documents and by interviewing ASEAN and ECOWAS officials as well as international- and non-governmental organisation staff in both regions. These insights illustrate how actors in regional organisations pursue integration and illuminate the relationship between region-building initiatives, regional integration policies, and citizenship building. Citizenship building has long been a central component of community building, nationally as well as regionally (Wiener 1998; Tilly 2005). This thesis speaks to this focus and shows how these processes play out in real life within the organisations by engaging with the primary actors involved with the formation and institutionalisation of citizenship and citizenship-related policies. Of particular significance is the thesis' account of how legal and non-legal initiatives and formal and informal norms and practices can create different types of citizenship regimes (article 4). Thus, the findings also speak to broader debates on regional integration.

By showing how two different regional citizenship regimes are constructed and by discussing the underlying citizenship theorisations (liberal, republican, and communitarian notions of citizenship, or citizenship as a contract vs. practice), the thesis contributes knowledge which speaks to the question of how we can *theoretically* perceive citizenship in regional communities, in legal and non-legal ways. Hence, the core theoretical contribution of the thesis lies in showing that regional citizenship regimes can be constructed by *both* formal and legal definitions of citizenship status *and* informal and non-legal citizenship policies. Consequently, the thesis contributes a theoretical understanding of regional citizenship regimes as *formal* and *informal* regional memberships in a political community defined by a regional organisation. This broad theorisation of citizenship regimes leaves room for legal and non-legal criteria, thus incorporating a suggestion made by Antje Wiener as early as 1998.

Consequently, the thesis contributes knowledge on how theoretical and conceptual assumptions of citizenship inform regional political decisions on citizenship regime formations. The thesis unpacks various theoretical underpinnings of different regional citizenship regimes such as liberal approaches which especially promote a legal status and rights. However, republican assumptions – which emphasise active participation and accessibility in a wider community for all citizenship – and communitarian assumptions – which emphasise a sense of social cohesion and a specific, polity-driven form of identity which marks the boundaries of inclusion/exclusion – equally inform the institutional perceptions of regional citizenship regimes in the two regions.

The comparative case study approach sheds light on the similarities and differences between the ECOWAS and ASEAN citizenship regimes. Yet, it is important to note that while regional citizenship regimes can be viewed as both formal and informal memberships in a political community, the legal definition does have an important role to play. Because ECOWAS has legally defined what it means to be an ECOWAS citizen, claims to rights and opportunities are more accessible for regional citizens of ECOWAS than for ASEAN citizens, who cannot claim rights in a regional court nor refer to specific, legal definitions of community rights in the charter. That said, although one's status as an ASEAN citizen is not legalised, aspects of the regime are, which makes this more than a regional identity (Cabrera and Byrne 2021), a dynamic that I investigate in depth in the novel comparison of ECOWAS and ASEAN (article 4).

Outline of the thesis

This introductory chapter outlines the focus of this thesis, its research aims and objectives, limitations and delimitations of the comparative study, and its main contributions to knowledge. Chapter 2 provides a historical background on the development of the two organisations that constitute the empirical cases of this thesis, their different institutional designs and governance structures, and their institutional focus on people-centric regionalism. It, thus, provides the reader with the necessary insights into the institutional characteristics of the two organisations and thereby helps the reader to better understand and contextualise the citizenisation processes of ECOWAS and ASEAN and their diverse regional citizenship regimes. In Chapter 3, I outline the main theoretical discussions around the concept of citizenship. This is important for understanding the different types of regional citizenship regimes. These theoretical perspectives also inform the analytical framework. In the last part of the chapter, I discuss this framework and outline each of the four constitutive dimensions: rights and duties, access to political participation, belonging and identity, and a responsibility mix.

Chapter 4 explains my methodological choices and how I generated data for the comparative study. I present the rationale for choosing a comparative case study approach and the case selection criteria. I also outline my research methods and discuss the analysis of data and the operationalisation of the four dimensions of the analytical framework. The chapter closes with a discussion on the reliability and validity of the data, and a note on ethical dilemmas and my positionality as a researcher. Chapter 5 summarises the study's main findings. In it, I provide answers to the three research questions as well as reflections on directions for future research. This chapter should be read alongside or after reading the four journal articles that constitute the main body of the thesis, and which present original, empirical data and analysis. These can be found at the back of this thesis and are summarised below.

Article summaries

The five chapters of the Kappa provide the framework for the four research articles I authored for this compilation thesis. Thus, the articles are the central components of this thesis. The four articles explore regional citizenship regimes from different approaches and engage with the three main research questions in distinct ways. Article 1, *Variations of citizenship in regional organisations: a cross-regional comparison of rights, access, and belonging*, explores the variation of citizenship in eight regional organisations[8]. The

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[8] The article focuses on examining the variation of citizenship in the Association of Southeast Asian Nations (ASEAN), the Andean Community (CAN), the Caribbean Community (CARICOM), the East African

article is motivated by a shift that occurred in the 1980s that saw regional organisations emerge as spaces for developing, regulating, and providing citizenship. Current literature has primarily approached the study of citizenship in regional organisations from a rights-based perspective and has focussed on a 'narrow' set of cases, thus without providing an account of the variation of citizenship across different regional organisations.

The article deploys a broad, conceptual approach for the study of regional citizenship and uses a three-tiered conceptual framework – consisting of rights, access, and belonging – to analyse how citizenship varies across different regional organisations. The mapping of the ways in which the eight regional organisations have formulated citizenship and citizenship-related policies in their institutional frameworks challenges current notions of regional citizenship that draw on the EU's rights-based approach. Thus, the article contributes new knowledge relevant to the field of comparative regionalism and citizenship studies by providing an overview of citizenship variation across eight regional organisations. This mapping exercise shows that citizenship in regional organisations can be conceptualised as either legal and constitutional or informal and practice based, and that there are different pathways to regional citizenship – some in which practices may precede law.

Whereas article 1 provided a comparative overview of citizenship in regional organisations, article 2, *The emerging regional citizenship regime of the Association of Southeast Asian Nations*, zooms in on a particular case of a regional citizenship regime. Article 2 provides a single case study of the emerging ASEAN citizenship regime – one of the primary cases of the thesis. The study of citizenship in ASEAN is motivated by the fact that the current literature on ASEAN regionalism has refrained from examining the link between community-building and citizenship-building. Moreover, the article challenges the dominant assumption that ASEAN lacks a citizenship regime. This assumption developed around the idea that regional citizenship regimes are the result of the reconfiguration of national citizenship rights and that they are contingent on a legally defined status in organisations' institutional frameworks. However, citizenship regimes can emerge more informally through institutional norms and practices and through the development of citizenship-related policies, as this article shows. Through the use of the four dimensions of the concept of citizenship regime – rights and duties, access, belonging, and the responsibility mix – the article shows that ASEAN has progressively formed a particular type of regional membership characterised

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Community (EAC), the Economic Community of West African States (ECOWAS), the European Union (EU), the Gulf Cooperation Council (GCC), and the Common Market of the South (Mercosur).

as informal, developing, and atypical, much in line with the organisation's ASEAN Way governance logic.

Similar to article 2, article 3: *Regional citizenship regimes from within: unpacking divergent perceptions of the ECOWAS citizenship regime,* provides a single case study of another regional citizenship regime. In contrast to ASEAN, ECOWAS has legally defined its regional citizenship regime according to a set of binding agreements and protocols, and the citizenship policy has been one of the guiding governance objectives since its formation in 1975. The article explores the ECOWAS citizenship regime by investigating how different actors of the ECOWAS Commission[9] understand the citizenship regime and how these institutional understandings vary. To guide this study, the article deploys the same analytical framework used in article 2, namely, the four-tired concept of citizenship regime. This framework helped structure the analysis of the empirical material, it guided the data collection – which was done through semi-structured interviews and document analysis – and it compared and contrasted the diverse institutional perceptions of the ECOWAS citizenship regime by illustrating which dimensions are emphasised.

The study of the perceptions of the ECOWAS citizenship regime from within the organisation contributes new empirically grounded data to scholarship on the relationship between citizenship and regional organisations. In particular, the empirical findings contribute to the growing body of literature which examines regional citizenship building beyond Europe and show that these regimes do not merely mimic the EU. The analysis of the perceptions of the regime is also relevant to studies on regionalism and contributes to current debates around regional integration and governance. Moreover, unpacking the diverse institutional citizenship perceptions of the executive arm of ECOWAS speaks to studies of African regionalism and informal international relations (IIR), which examines the role and impact of regional bureaucrats and highlights their importance in (re)shaping national policies.

Lastly, article 4, *The ECOWAS and ASEAN citizenship regimes: comparing regional forms of membership*, investigates the different regional citizenship regimes that emerged in the Association of Southeast Asian Nations and the Economic Community of West African States. This article's focus, and the comparative analysis it features, is motived by the shift towards framing citizenship as membership beyond, rather than within, the nation-state. This shift has taken place at the same time as other policy agendas within regional organisations, including the initiation of different citizenship policies, were

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[9] The article explores the institutional perceptions of citizenship in the Department of Trade, Custom and Free Movement, the Department of Infrastructure, the Department of Political Affairs, Peace and Security, the Department of Social Affairs and Gender, and the Department of Education, Science and Culture.

developed and regulated at the regional level. The article shows that these new regional integration agendas have informed a reconfiguration of citizenship and the development of a new type of belonging, defined within a regional community.

The comparison is also motivated by the fact that while regional citizenship is a well-known concept in the literature on the European citizenship regime, knowledge around regional citizenship regimes beyond Europe remains far more limited, especially in terms of identifying broader patterns and trends across different regions. Thus, in line with the overall objective of this thesis, article 4 contributes to our understanding of how the two citizenship regimes are conceptualised from the perspectives of actors within these regional organisations. Moreover, it shows that despite the discernible differences in legalisation, i.e., formal membership rights, there are also several similarities in how ASEAN and ECOWAS seek to advance their citizenship regimes.

2
Contextualising the study

This chapter introduces the two regional organisations that are the case studies for this thesis: the Association of Southeast Asian Nations (ASEAN) and the Economic Community of West African States (ECOWAS). ASEAN and ECOWAS are post-war regional organisations founded between neighbouring countries in Southeast Asia and West Africa, respectively, to advance regional stability and prosperity following the independence of states in these regions and a series of national and inter-regional conflicts (Desierto and Cohen 2021; Ukaigwe 2016). The chapter briefly introduces the reader to the events leading to the formation of the two organisations. Moreover, I provide a brief overview of the organisations' different institutional designs and governance structures, including an account of the organisations' recent turns to people-centric regionalism. The aim of this chapter is to contextualise ASEAN and ECOWAS and to provide information that helps the readers understand the case studies of this thesis.

The Association of Southeast Asian Nations

The process that led to the establishment of ASEAN was dominated by political turbulence and tensions in a regional context shaped by colonialism, wars, and internal cooperation conflicts (Irvine 1982). The pre-ASEAN period saw several attempts to found cooperative organisations among some of the newly independent countries of Southeast Asia. One example of this was the Association of Southeast Asia (ASA), which was established in Bangkok, on 31 July 1961, by the leaders of Malaya, the Philippines, and Thailand. ASA's objectives were to establish economic, social, cultural, and scientific cooperation in a post-war region (Jetschke 2012). However, political tensions due to conflicts over land rights between Malaya and the Philippines as well as border conflicts and internal political debates over, inter alia, the formation of modern Malaysia, which took place at the same time, limited ASA's ability to advance regional cooperation (Ba 2009).

In 1966, the presidents of Malaysia and Indonesia began conversations on political cooperation between their countries. The negotiations and the wish to establish regional economic ties marked the end of a period of ongoing political tension and confrontation between the Southeast Asian countries. During meetings in Bangkok in 1966 and 1967, the countries increasingly set aside their post-colonial rivalry (Irvine 1982) and agreed to form a new regional organisation to facilitate peace, stability, development, and economic integration. Thus, on 8 August 1967, ASEAN was founded in Bangkok, by the Foreign Ministers of Indonesia, Malaysia, the Philippines, Singapore, and Thailand (Desierto and Cohen 2021).[10]

Regional governance and institutional design

The founding objectives of ASEAN and the basis for regional cooperation were economic development and greater security in the region. The ASEAN countries agreed to work towards prosperity, peace, development, and the rule of law.[11] When discussing the governance structure and the institutional norms guiding the work of ASEAN, one needs to differentiate between the pre-Charter and the post-Charter period. Before the ASEAN Charter came into force in 2008, a 'loose' and somewhat undefined governance structure shaped the internal political landscape of ASEAN (Desierto 2021).

Although notions of informality and non-legality defined ASEAN governance and law, the organisation has explicitly emphasised rule of law as a fundamental principle – for example, in the 1976 Treaty of Amity and Cooperation (TAC). Later institutional agreements, such as the 1992 Singapore Declaration, issued by the 4th ASEAN Heads of Government Summit, also emphasised international law, the UN Charter, and regional legal instruments as guiding principles for regional cooperation in ASEAN (ASEAN 1992). Motivated by the 1998 Asian financial crisis, ASEAN leaders began to emphasise the need for regional development to transcend economic matters and reaffirmed that economic development must ultimately serve the purpose of improving human development and advancing the eradication of poverty in the region (ASEAN 1998). To achieve the objectives of economic and human development, ASEAN leaders agreed on the need for a rules-based multilateral governance structure (Desierto and Cohen 2021). This ultimately resulted in the adaptation of the Vientiane Action Programme, which presented a strategy

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[10] Although the five founding countries had at first been unsuccessful in attracting other Southeast Asian countries to be a part of ASEAN, the CMLV countries (Cambodia, Myanmar, Laos, Vietnam) and the Sultanate of Brunei Darussalam later joined the organisation, and by 1999 all ten ASEAN countries were members of the organisation (Desierto and Cohen 2021).

[11] Rule of law remains a contested concept within ASEAN, and the interpretation of the concept varies significantly between member states (Desierto and Cohen 2021).

for establishing rule of law, judiciary systems, and legal instruments within ASEAN (ASEAN 2004). Thus, at the 12th ASEAN Summit in Cebu, the Philippines, in 2007, the ASEAN countries agreed on the Cebu Declaration which began the process of establishing the ASEAN Charter, which was signed by all member states on 20 November 2007 (ASEAN 2008).

The signing of the ASEAN Charter marked an institutional change in the organisation and the beginning of a 'legal personality' of ASEAN. The charter showed a new 'commitment to declare and recognize ASEAN's existing international legal personality as a regional organization' (Desierto 2021, 30). However, Kilian Spandler notes that 'while the ASEAN member states took inspiration from the EU when reforming their own regional organisation, they continue to be highly sceptical about institutional arrangements that centralise decision-making and compromise state sovereignty' (2019, 2). This scepticism is prevalent within the charter, which notes that member states shall have 'respect for the independence, sovereignty, equality, territorial integrity, and national identity of all ASEAN Member States', as well as 'non-interference in the internal affairs of ASEAN Member States' (ASEAN 2008, 6).

The institutional development of ASEAN, initiated by the signing of the charter, brought with it a new design and institutions. Not long after the adaptation of the Charter, the ASEAN Intergovernmental Commission on Human Rights (AICHR) was established, and the ASEAN Secretariat was divided into three so-called Community Pillars: The Political-Security Community (APSC), the Economic Community (AEC), and the Socio-Cultural Community (ASCC), all with the shared objective of fostering greater regional integration (Desierto 2021). Pre-charter ASEAN initially had a decentralised governance structure. Although the post-charter governance structure is more centralised, the absence of a regional court and parliament and the attention to the 'ASEAN Way'[12] governance logic have received extensive criticism (Jetschke 2012). Indeed, decisions by the ASEAN secretariat or other associated institutions must be substantiated by each member state, severely curtailing the political power of the regional organisation (Desierto and Cohen 2021). Moreover, although the ASEAN Charter introduced a 'rights turn' in the organisation, it lacked any hard legal

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[12] The ASEAN Way is the common term for the organisation's non-confrontative regional cooperation strategy, including the attention to national sovereignty, informality, and non-interference. The ASEAN Way tells us about the governance structure and institutional design of ASEAN and provides a basis for the understanding of internal tensions and dynamics between the member states, as ASEAN - like other regional organisations should not be considered monolithic (Jetschke 2012).

mechanisms, and thus responding to political failure of any member state is currently not possible (Jetschke 2012)[13].

Although the creation of the charter, the establishment of the three community pillars, and the subsequent documents on regional integration objectives depict ASEAN as a more consolidated organisation, bilateral tensions still influence the regional integration process and decision-making procedures. The Rohingya genocide at the hands of the armed forces in Myanmar between 2016 and 2017 was quickly condemned by the Malaysian and Indonesian representatives to the ASEAN Intergovernmental Commission on Human Rights (AICHR) (Missbach and Stange 2021). However, ASEAN itself and other country representatives to AICHR, such as Thailand and Cambodia, remained silent partly due to these countries' own authoritarian governance structures and human rights violations. Bilateral tensions also continue to influence regional cooperation within ASEAN, which the historical dispute over land between Singapore and Malaysia demonstrates (Tan 2000).

Since 2008 and the signing of the ASEAN Charter, the member states, at least officially and on paper, agreed to 'promote a people-oriented ASEAN' (ASEAN 2008). This people-centric governance mode became a core objective of the organisation's institutional agreements, such as the ASEAN Economic Community Blueprint (ASEAN 2016). Consequently, the institutional frameworks of ASEAN formulate regional integration as people-centric, drawing on the premise of participatory regionalism. Amitav Acharya defines participatory regionalism as 'the engagement of social movements in the official regionalism of states' (2018, 179). He further explains that participatory regionalism is defined by 'the acceptance by governments of a more relaxed view of state sovereignty and the attendant norm of non-interference in the internal affairs of states'. This approach, he argues, 'allows for more open discussion of – and action on – problems facing a region and creates more space for non-governmental actors in the decision-making process' (Acharya 2018, 179–180).

Although the ASEAN Intergovernmental Commission on Human Rights might be seen as a somewhat successful example of an institution practicing participatory political decision-making (Jetschke 2012), people-centric governance in ASEAN is largely an institutional norm seen for the engagement with civil society, which helps legitimise the already established ASEAN policies and norms (Glas and Balogun 2020). This particular governance mode impacts the regional citizenship discourse, its design, and development. Thus, the ASEAN Way governance logic, the organisation's myriad of bilateral and

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[13] One example of the latter, which stands in stark contrast to the suspension policies of ECOWAS, is the lack of any meaningful response to the military coup that took place in Myanmar on 1 February 2021.

multilateral agreements and memoranda of understandings (MoUs), and the tendency to favour informal and non-binding agreements directly translate into a conceptualisation of the emerging yet nascent ASEAN citizenship regime (Cabrera and Byrne 2021) and help explain the particular characteristics of citizenship in ASEAN.

The Economic Community of West African States

Before the formation of modern nation-states and colonial empires in West Africa, the region consisted of various smaller communities and larger empires, such as the Empire of Ghana and the Mali Empire (Swindell 1995). In pre-colonial times, trade, farming, and cultural exchange occurred frequently between the communities and violent clashes and peaceful interactions thus affected the formation of the region and its ethical groupings and contours. Voluntary as well as involuntary movement between the groups and communities was thus a common phenomenon but was increasingly limited and regulated during colonial subjection (Swindell 1995).

During the post-colonial period of independence and state formation, the leaders of the newly established countries of the West African region sought to re-establish pre-colonial relationships (Obi 2012). Thus, free movement became a central objective of the negotiations and discussions around the establishment of regional cooperation between the newly independent nation-states. The first initiative towards establishing closer bonds came from the Liberian president Tubman, who pushed for unity between Liberia, Côte d'Ivoire, Guinea, and Sierra Leone. These four countries established a union in 1965, but it proved ineffective due to political tensions and was eventually dismantled (Obi 2012).

However, the desire to form a regional community among the countries remained, and in 1972, General Yakubu Gowon, the Nigerian head of state, and General Eyadema, the Togolese head of state, met and discussed the development of regional collaboration among the sixteen countries of West Africa. In 1973, the two heads of state met with the other fourteen leaders to discuss general ideas and objectives of a potential regional economic community. As a result, ECOWAS was founded on 28 May 1975, with the signing of the Treaty of Lagos between the states of Benin, Burkina Faso, Cape Verde, Côte d'Ivoire, Liberia, Mali, Niger, Nigeria, Gambia, Ghana, Senegal, Guinea, Sierra Leone, Guinea-Bissau, Togo, and Mauritania. Except for Cape Verde, all West African countries became members of ECOWAS simultaneously, setting it apart from ASEAN's membership trajectory. ECOWAS was established to promote cooperation and integration among the countries and their peoples, and instead of being a supranational organisation,

it was designed as a governing body that sought to harmonise national policies and practices to advance regional integration (Obi 2012). Since the formation of the organisation, Mauritania withdrew its membership in 1999, and between May 2021 and January 2022, Mali, Guinea, and Burkina Faso have been suspended due to military coups (Avoulete 2022).

Regional governance and institutional design

In the previous section I divided my account of ASEAN's governance structure and institutional design in the pre- and post-charter periods. However, no such division can be made in the case of ECOWAS, as the organisation was founded through the signing of the ECOWAS Treaty of Lagos in 1975 (ECOWAS 1975). Thus, the organisation gained its legal identity from its formation. That said, ECOWAS has undergone some drastic institutional changes. The Revised Treaty of 1993 initiated a set of institutional changes, such as the establishment of the ECOWAS Community Court of Justice and the establishment of the ECOWAS Community Parliament in 1994 (ECOWAS 1993). In 2007, the ECOWAS Executive Secretariat was transformed into the ECOWAS Commission. The change from a secretariat to a commission took place due to the leaders' wish to 'achieve the vision of the founding fathers of "a borderless region where the population has access to its abundant resources and is able to exploit them through the creation of opportunities under a sustainable environment"' (ECOWAS 2022a).

The institutional changes that took place after the adaptation of the Revised Treaty resulted in ECOWAS' current structure, consisting of three governance bodies: the Executive Commission, led by the president of the commission, a vice president, and 13 commissioners, one from each member state; the Legislative Community Parliament; and the Judiciary Community Court of Justice (Glas and Balogun 2020). Even though ECOWAS view itself as a regional organisation, the governance structure and framework show that ECOWAS 'is more inclined towards supranationalism and majority voting in formal decision-making procedures' (Hulse 2014, 556). The treaty notes that integration may demand the partial and gradual pooling of national sovereignties. Over the past years, the ECOWAS Commission has also gained increased autonomy, a trend far removed from the reality of ASEAN.

Although ECOWAS shows some supranational traits, the organisation is not monolithic, and internal tensions between member states influence its political work. In contrast to ASEAN, the tensions are often rooted in the division between the former French colonies and the former British colonies. For instance, the anglophone and francophone dichotomy has stalled the objective of establishing a single ECOWAS currency. The reason can be found

in the desire to retain the West African CFA franc, and more importantly, in the relationship between France and its former colonies in West Africa, which are still today under strict control (Asongu et al. 2021). Another example of internal dispute, which had a direct impact on free movement within ECOWAS, was the border closure between Nigeria and Benin in the autumn of 2019, due to the Nigerian government's wish to curb illegal trade (Omale et al. 2020).

In ECOWAS, the turn to people-centric regionalism[14] was a central objective of the Vision 2020, which outlined the seemingly institutional turn from an 'ECOWAS of States' to an 'ECOWAS of People' (ECOWAS 2020), an objective reemphasised in the ECOWAS Vision 2050 (ECOWAS 2022b). ECOWAS' people-centric governance model has resulted in the establishment of mechanisms for civil society participation in decision-making procedures and policy discussions, although their effectiveness is questionable (Glas and Balogun 2020). Moreover, this governance model has been officially accepted not merely as a way to normatively advance regional integration but also as a means for establishing community citizenship, as emphasised in the ECOWAS Visions and citizenship protocols (ECOWAS 2022b).

Yet, even though the people-centric governance model increasingly advocated for by ECOWAS (and ASEAN) formally establishes more inclusive political decision-making procedures and mechanisms, genuine access to participation (in both regions) remains currently inadequate (Bappah 2013; Cabrera and Byrne 2021). This could stem from a lack of institutional capacity or will or indicate that the people-centric regional governance models of ASEAN and ECOWAS are used to legitimise the organisations rather than to inform political decisions and the way they are made (Gerard 2015).

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[14] The term people-centric regionalism encompasses the discussion, adaptation, and development of policies and decision-making processes to directly engage and reflect the voices of citizens, non-state actors, and other relevant stakeholders (Glas and Balogun 2020). ASEAN and ECOWAS have more recently, at least rhetorically, adopted the norm of people-centric governance, understood as opposing the state-centric regionalism governance structure characterised as more elitist and top-down.

3

Theoretical perspectives and analytical framework

In this chapter I review and discuss the most relevant theoretical perspectives underpinning this study's comparative case study of regional citizenship regimes. The chapter is divided into two parts. In the first part, I briefly discuss how citizenship is conceptualised, and I outline three different approaches to the concept of citizenship: liberal, republican, and communitarian. Thereafter, I explore theorisations of citizenship as a contract and as practice and provide an overview of citizenship by scholars who challenge the prevalent 'Western' understandings and perspectives. In the last section of part one, I discuss different loci and boundaries of citizenship and contemporary research on citizenship in regional organisations. In the second part of this chapter, I outline the analytical framework of the thesis. I present a theoretically informed analytical framework which I use for examining the concept of citizenship regime in the two regional organisations. The framework consists of the four dimensions: rights and duties, access to political participation, belonging and identity, and the responsibility mix. The chapter ends with an outline of the ways in which I understand these four dimensions, respectively. However, the explanation of how I treat the four dimensions in the comparative case study analysis and how I operationalise them during field research is included in the following chapter on methodology.

Conceptualising citizenship

Citizenship 'means different things in different contexts' (Wiener 1998, 3) and no single, complete theory of citizenship exists (Turner 1993; Tilly 1996; Marshall 1950). It may imply a (social) contract or a practice between citizens of a community and a sovereign polity (Tilly 1996) and conceptually range from 'thin' to 'thick', or 'passive' to 'active' (Tilly 1996, 8). It has primarily been associated with membership in a national political community, at least in

Western, democratic contexts. Early thinkers like Thomas H. Marshall emphasised that citizenship is a context-specific concept, by stating that 'there is no universal principle that determines what those (citizenship) rights and duties shall be, but societies in which citizenship is a developing institution create an image of an ideal citizenship against which achievement can be measured and towards which aspiration can be directed' (Marshall 1950, 29).

Since the 1980s, the concept of citizenship has been subject to reinvigorated academic and political discussions partly due to its relevance for policy debates on migration, integration, and multiculturalism (Isin and Turner 2007; Shachar et al. 2017). These renewed discussions emerged as scholars and policymakers began initiating debates on how to best approach the meaning of citizenship in times of increasing mobility across countries and regions. In this thesis, I use the definition of citizenship by Rainer Bauböck: 'citizenship is a membership-based concept. It means many other things too, but all interpretations of citizenship need to rely (explicitly or implicitly) on its conceptual core, which is 'membership in a political community' (Bauböck 2017, 66).

What derives from this definition is, first, an understanding of citizenship as membership, and second, an understanding of this membership as being defined within a *political* community. As a membership, citizenship distinguishes insiders from outsiders (Linklater 1998). However, this does not imply that membership is a static or fixed status, and one might have multiple memberships in different communities, which may change over time. Political communities should be seen as entities which are 'organised around political institutions that govern their members' (Bauböck 2017, 68). Political communities thus play an important role as actors in the definition of the terms for membership status, and by determining who belongs to the community through rights, modes of access, and a sense of belonging. Thus, as argued by Andrew Linklater (1998, 1), 'political communities endure because they are exclusive, and most establish their peculiar identities by accentuating the differences between insiders and aliens'.

Approaches to citizenship

Although citizenship remains a contested concept with various dimensions and qualities, contemporary, Western discussions usually deploy, as their point of reference, one of three overarching and normative theoretical underpinnings: a liberal understanding, a (civic) republican understanding, or a communitarian understanding (Isin and Turner 2002; Habermas 1994). Liberal perspectives commonly highlight civil rights, framed as universal and individual. Republican perspectives, on the contrary, perceive active participation in the

political community as the constitutional dimension of citizenship. Lastly, communitarianism emphasises the feeling of membership, commonly forged by shared norms and practices creating a sense of community belonging, and thus emphasises citizenship as 'membership in the prepolitical, cultural community' (Olsen 2012, 3).

A more recent debate has also inspired discussions on the loci and boundaries of citizenship, and scholars are also increasingly approaching citizenship from non-Western perspectives. When discussing these different normative theoretical traditions which have shaped the ways we conceptualise citizenship today, it is important to bear in mind that these understandings do not necessarily represent opposing perceptions but are rather complementary theories that evolved in different socio-political and historical contexts (Honohan 2017). In the following sections, I take on the task of providing an overview of liberal, republican, and communitarian theorisations of citizenship and discuss how they have influenced perceptions of citizenship as a contract and practice.

Liberalism and citizenship

In Western, democratic parts of the world, citizenship is conceptually understood as an inherently sovereign concept, encompassing rights and a legal status. This understanding has its roots in the socio-political context of Greek city-states (Balot 2017). Thus, the Western theoretical perception of citizenship built primarily on this historical tradition and the more recent dominance of liberalism in political theory. At the core of the liberal theorisation of citizenship is a strong emphasis on the individual and the perception of the rights of citizens as universal and equal (Janoski and Gran 2002). At the same time, the liberal tradition does emphasise the importance of duties and responsibilities arising from these rights. Duties that are considered essential, such as voting, obeying the law of a polity, paying taxes, and obeying the principles of liberty are especially important for the liberal tradition (Rawls 1971; Kymlicka and Norman 1994). However, rights are perceived as the primary component of a citizenship status, with only few core obligations. Thus, the relationship between rights and obligations, between the citizens' obligations to a polity and the corresponding rights granted are of a *contractual* nature, a specific conceptualisation of citizenship which I will explore later in this chapter.

Liberal theory has been promoted by John Locke, especially in his earlier work, where he argued that private property must be viewed as an essential condition for individual freedom. John Stuart Mill likewise advanced liberal theory, viewing individuals as naturally capable of upholding 'reason' and

exercising 'just law'. Moreover, scholars like Adam Smith, T. H. Marshall, Robert Dahl, and John Rawls have further developed the trajectory of liberal theory. In the 20th century, liberalism became the dominant political and economic theory in the global North. Here, the work of T. H. Marshall (1950) and his theorisation of citizenship as a progressively built status are of particular importance. Marshall is especially known for his account of citizenship as a relation between the individual and the nation-state, defined by a regime of rights, privileges, and duties (Marshall 1950, 29). In developing a liberal theory of citizenship, Marshall famously divided the concept of citizenship into three overarching types of rights, which he saw as having been progressively developed in British society: civil rights, political rights, and social rights (Marshall 1950, 10–11). Moreover, he argued that civil, political, and social rights emerged at different times, due to the level of development of various institutions in British society.

Marshall's theorisation remains one of the most influential liberal accounts of citizenship to this day, especially for contemporary liberal scholars (Turner 2022). Based on the liberal theoretical perception of the individual and the state, Marshall's theorisation called for a type of citizenship in which the institutions of a state produce an equal and unified citizen-subject (Molavi 2013). However, his theorisation is a product of its time and has several shortcomings, notably it lacks any reference to other types of communities outside of Britain or to the importance of ethnicity, gender, culture, class and so forth, all of which may impact the formation of a unified citizenry in a community.

When evaluating liberal citizenship, Peter Schuck (2002) notes that perhaps the most difficult part of liberalism today is the ability to reduce inequalities through liberal policies while at the same time remaining true to the constitutive dimensions of liberalism such as individual liberties. He further argues that 'liberalism may actually increase economic and certain other kinds of inequalities rather than reduce them – unless and until the benefits of market-driven economic growth 'trickle down' to the socially disadvantaged' (Schuck 2002, 140). Thus, although the Western, liberal perception of citizenship advocates for equality and liberty, it can yield decidedly different outcomes that run counter to values such as equality (Kochenov 2019).

Republicanism and citizenship

Civic republican scholars argue that 'the liberal emphasis on individual rights and liberties has worked to loosen civic bonds and undermine self-government' (Dagger 2002, 152). Moreover, liberal theories of citizenship

have been criticised for their emphasis on rights and for being too passive. The republican school of thought has its origins in ancient Rome, in Cicero's writings and much later in Machiavelli's thinking. The republican understanding of citizenship typically assumes 'that the public comprised the citizenry, and only property-owning, arms bearing men could be citizens' (Dagger 2002, 146). In evaluating this citizenship model, from which the republican tradition derives, Philip Pettit (1997) emphasised that rule of law and freedom – the latter conceptually understood as non-domination – form the core of this theorisation of citizenship. Non-domination implies a condition of independence from arbitrary power and subjection. However, in reality, domination was an everyday element of ancient Roman life because citizens' status was contrasted with the status of non-citizens, such as women, slaves, and non-Romans. As Ryan Balot (2017, 18) notes, 'although the republican regime was defined by the rule of law, we need to acknowledge that law itself is typically an instrument of, and a disguise for, social power'.

Yet, modern republican theorisations of citizenship have abandoned such exclusive perceptions and in contrast to liberalisms' emphasis on rights, republican perceptions highlight duties and active participation as a way to become a citizen of a community (Dagger 1997). Inspired by the work of James Harrington and Jean Jacques Rousseau, republican understandings of citizenship emphasise active political participation. However, in times of increased expansion of territories during the 18th century, active political engagement became more challenging to uphold in these larger communities. During the American and French revolutions, the idea of republican citizenship was increasingly popular as citizens actively condemned the arbitrary subjection from higher authorities.

Rousseau dominated this new way of thinking about citizenship, and his theorisation still underpins modern republican theories of citizenship today. According to Rousseau, people who consent to enter into civil society as a group are called the *sovereign*. This sovereign may be thought of metaphorically as a person with a unified will (Williams 2007). Subsequently, although individuals might have different opinions, the sovereign expresses the group's general will, which, according to Rousseau, is defined as the collective need to provide for the common good (Walzer 1989). From this perspective, republican citizenship has an ethical and a legal dimension. Citizenship is a matter of legal status, which grants certain rights and obligations to the citizen, different from those of non-citizens. The republican understanding of the role of ethics posits that for citizenship to be 'true' and 'complete', citizens need to commit to the common good of the sovereign before pursuing their individual needs and rights. This commitment is realised

by actively participating in the political life of a community (Dagger 1997), and as argued by Henning Melber et al., civic engagement can facilitate social stability and 'would reinforce a model of governance under the rule of law' (Melber et al. 2022, 16).

Communitarianism and citizenship

During the 1980s, communitarianism emerged as a theoretical response to, and critique of, the prevalent liberal perception of citizenship as a contract between an individual and a state, and its emphasis on individualism and rights (Delanty 2002). This sparked a debate on the conceptualisation of citizenship as a cultural term forged by social practices in a (prepolitical) community. Communitarian citizenship theory rejects liberal individualism and the contractual relationship between citizens and a state. Communitarianism can be viewed as a reaction to the theorisation of citizenship as a *universal* contract (Kaul 2021). Unlike the liberal conception of citizenship based on rights and duties, communitarianism advocates for equal consideration of political engagement in a community and the social cohesion between its citizens. Thus, communitarian scholars argue that the liberal focus on formalistic rights neglects identity and participation, which communitarian theory considers to be the ties that bind people together in a community (Walzer 1990). Put somewhat differently, the communitarian theoretical perspective argues that citizenship is rooted in a culturally defined, prepolitical community (Delanty 2002).

In the thesis, I use a broad definition of citizenship as membership in a political community (Bauböck 2017). Although the different approaches to citizenship can agree on this definition – to some extent – they differ in terms of whether citizenship as membership rests on the individual or a cultural community (Delanty 2002). Communitarianism, by and large, advocates moral collectivism that is less individualistic and proposes a different perception of 'the self' than the equal and individual liberal 'self'. In the communitarian tradition, 'the self' is culturally specific, and thus, this proposition adheres to cultural particularism rather than universalism. Moreover, 'the self' is socially constructed and embedded in cultural and social practices (Kaul 2021). Thus, communitarian citizenship is always theorised as community-dependent and context-specific (Taylor 1994), not as a universal, legal contract.

Central to this approach to citizenship is the concept of community. Scholars argue that from this perspective, citizenship is more than membership in a democratic, liberal state. However, communitarian perceptions can sometimes take for granted the social stability and cohesion of a community which they view as a culturally defined entity. That said, even cultural

communities are not necessarily cohesive (Delanty 1997). This perception is misleading as groups, whether cultural, social, or political, tend to be difficult to define as one stable unit. This critique of communitarian community perceptions is especially relevant to the study of regional citizenship regimes, as these regional communities are far from cohesive, unified, or stable.

In a critique of Rawls (1993), communitarians point out that liberal concepts of citizenship fail to consider that separate groups might hold different views of what the common good is (Taylor 1994; Delanty 1997). However, when it comes to the protection of minority groups within a community, liberal scholars have argued for a commitment to group rights or, as framed by Will Kymlicka (1996), differentiated rights. On the other hand, communitarian perspectives have been criticised for promoting and protecting the predominant culture of a community. Rawls (1987) emphasises that reaching an agreement in a community between people who hold different views is a matter of 'overlapping consensus', and thus, the liberal perception of difference between persons in a community implies a respect for individual freedoms. In a critique of communitarianism, Gerard Delanty (2002, 166) points out that 'the communitarian 'difference' stands for the group's power to limit individual freedom. The concept of community in communitarian discourse is the community of the dominant culture which is officially recognised by the state'. This, as further argued by Delanty, means that minority groups have to adapt to the official culture of a community in order to engage politically and be active citizens (Delanty 2002).

Citizenship as a contract and practice

The liberal, republican, and communitarian theoretical perspectives agree that citizenship implies membership in a community but differ in terms of how we ought to understand this membership and the relationship between citizens and the polity, and how we ought to think of the community in which citizenship is granted. The relationship between people and a polity has been conceptually understood and approached differently by scholars of these traditions. Common to many liberal approaches to citizenship is that citizenship is perceived as a (social) contract between people and a state (Wiener 1998). As mentioned in the previous section, Marshall (1950) provided one of the earliest citizenship theories drawing on various rights dimensions. According to Marshall, the rights-based relationship between citizens and a polity resembles a contract characterised as pertaining to specific obligations that have to be met to secure the civil, political, and social rights granted by different state institutions, which developed over time (Marshall 1950, 11).

The theory of citizenship proposed by Marshall became known for its demand to diminish inequality, as Marshall argued for the incorporation of social rights within the legal status of a citizen. For example, in line with the liberal position, Marshall sought to formulate a universal right to income, framed as a social contract between British society citizens and the state (Marshall 1950). Marshall's theory of citizenship as a social contract which is legally secured fostered important discussions on how to understand the relationship between people and a polity. But scholars of cultural pluralism and multiculturalism critiqued the theory for being private and passive in nature and especially questioned whether citizenship status and the associated rights really can be guaranteed by a neutral, liberal, democratic nation-state (Kymlicka and Norman 1994). However, Marshall did reflect on the importance of being able to access the rights on whose basis the citizenship contract is formulated (Marshall 1950).

Looking more closely at how scholars have viewed citizenship as a contract, we can also turn to the liberal account of John Rawls (1971; 1993). A central aim of Rawls' theory of justice was to accommodate cultural pluralism in notions of citizenship. According to Rawls, justice should be viewed as fairness, and an integral part of justice is to ensure fundamental rights and liberties for all citizens in democratic welfare states. Departing from the liberal proposition, citizens are here perceived as free and equal within a society containing functioning institutions responsible for upholding the citizenship contract between the people and the state (Rawls, 1971). Rawls developed his theory of justice and his understanding of equal, universal citizenship as a social contract in the context of European welfare states. Therefore, his views have been criticised for being rational and individualistic, placing the individual before society and its social structures (Treanor 2003). Moreover, the implicit assumption in Rawls theory that all citizens are equal members with the same social citizenship contract – or at least able to access the same contract rights – has been met with counterarguments questioning the applicability of his social contract theory to the vast number of people who do not hold the status of a citizen or are unable to access the rights granted to citizens (Kartal 2001; Treanor 2003).

Another critique of the understanding of citizenship as a contract relates to the role of the state. Marshall, Rawls, and other contractarian scholars typically perceive the liberal state as a stable and neutral provider of the social citizenship contract and the rights associated with this status. However, Bryan Turner (1990) showed the problems of viewing the state as a stabiliser, as this ignores violence and exclusive practices rooted in the very concept of citizenship, such as the state's ability to determine insiders and outsiders on

the basis of often arbitrary criteria for nationality. A similar problem lies in the promotion of a specific, singular, state-defined notion of identity which does not include all persons in a community. This problem is not exclusive to this understanding of citizenship but also exists in the communitarian understanding of the state I described in the previous section (Delanty 2002).

Another scholar who has made important contributions to the theorisation and conceptualisation of citizenship, and who also argues for citizenship as a type of contract or transaction, is Charles Tilly (1984, 1996, 1997, 2004, 2005). In his work, Tilly conceptualised citizenship as having four components: a category, a tie, a role, and an identity. He defines the components in the following way: 'as a category, citizenship designates a set of actors – citizens – distinguished by their shared privileged position vis-á-vis some particular state. As a tie, citizenship identifies an enforceable mutual relation between an actor and state agents. As a role, citizenship includes all of an actor's relations to others that depend on the actor's relation to a particular state. And as an identity, citizenship can refer to the experience and public representation of category, tie, or role' (Tilly 1996, 8). In Tilly's thinking, these citizenship categories, ties, roles, and identities are modified by practice, and once established, the citizenship dimensions are not fixed but can be changed and modified over time (Tilly 2005). Tilly argues that citizenship allocates certain mutually enforceable claims between citizens and a governing body, such as a state. Thereby, he saw the relation between citizens and a state as resembling a contract which is 'variable in range, never completely specifiable, always depending on unstated assumptions about context, modified by practice, and constrained by collective memory' (Tilly 1997, 600).

According to Tilly, nation-states are not only territorial organisations but can also be seen as membership organisations in which the contract between citizens and the state is negotiated and modified. Because citizenship is a negotiable transaction between citizens and a state, Tilly views citizenship as a transactional contract that is *modified* by social practices, which, in turn, change the boundaries of citizenship (2004). The question, then, is how such citizenship boundaries change. When discussing citizenship boundaries and the changes to citizenship loci, seen for instance in the reconfiguration from national to regional citizenship in Europe (Tilly 2004), Tilly proposes a set of mechanisms that help explain the formation and transformation of social boundaries. For instance, Tilly proposed that encounters between people create new social spaces and that 'encounters play a significant part in boundary change' (Tilly 2004, 218), such as changes to citizenship. This aspect of citizenship theorisation, the changes of community boundaries through which

citizenship is formed, was a central aspect of Antje Wiener's work examining European citizenship practices (1998, 2007, 2017).

The previous sections show how scholars have perceived citizenship as a type of (social) contract, with transactions between individual citizens and a state. However, as Tilly noted, this contract is modified through various practices of citizenship. Thus, instead of conceptualising citizenship as a contract, other scholars have approached the concept of citizenship from the perspective of practices. Antje Wiener (1998, 22) notes that 'whereas the first two elements, namely the citizen and the polity/community, have been stressed by contractarian approaches to citizenship in particular, until recently the third – relational – element has received less attention in efforts to conceptualise citizenship'. What she points out is that scholars ought to also look at the social practices of citizenship, not just the contractarian type of relationship between citizens and a state.

The relationships between practices and citizenship have been examined in various studies (Wiener 1998; Meehan 1993; Kabeer 2012; Lister 1997; Soysal 1996; García 2006; Schattle 2008; Hunter 2016). Of particular importance for this thesis is the link between regional citizenship practices and institution-building, especially highlighted by Wiener (1998, 2007, 2017). Wiener's socio-historical account of European citizenship practices speak directly to the objective of this thesis. Wiener's approach addresses regional citizenship mainly as practice between citizens and a polity, as well as the institutions within the polity. In doing so, she emphasises the importance of having access to citizenship and reminds us about the inclusion of formal as well as informal criteria when examining types of citizenship within and beyond a nation-state (Wiener 1998).

Subsequently, similar arguments about inclusion and access to citizenship have been made by Henning Melber et al. (2022), who, looking at the context in Africa, argue that making the citizenship contract more accessible for all citizens of a community requires more inclusive citizenship practices. In particular, we need 'to not only reduce citizenship to a legal status awarded by the state in a top-down manner but also to strengthen the social contract between citizens and the state (Melber et al. 2022, 6). This is what Wiener also referred to when arguing that to conceptualise citizenship in any community, we need to consider not only the polity and the individual but the citizenship practices between the two. Thus, in her argument, citizenship is forged by day-to-day practices between the polity and the citizens, which are negotiable,

fluid, and changing, and not merely a set of rights and duties[15]. In her work, she argues that to grasp the importance of citizenship practices for studying citizenship formation, research increasingly needs to assess 'the question of how intangible aspects of citizenship rather than formal criteria may be included in citizenship analysis' (Wiener 1998, 23). This argument guides the framework outlined at the end of this chapter. However, before taking a closer look at this framework, the next section provides a brief overview of theoretical and conceptual challenges to the liberal, republican, and communitarian perspectives of citizenship.

Beyond 'Western' approaches to citizenship

If we look beyond Western approaches to citizenship and instead turn to scholars exploring citizenship in areas with different historical legacies, citizenship takes on different forms. Erin Aeran Chung (2017) challenges the assumption that citizenship is a fundamentally Western concept in its origin and essence and argues that the study of citizenship in different contexts challenges, confirms, and complicates dominant and classic understandings of citizenship. Chung defines citizenship as 'a contested institution and cluster of practices negotiated by state and non-state actors that demarcate formal membership in a nation-state and its accompanying rights, statuses, and obligations' (Chung 2017, 432). From that perspective, citizenship is more than a formal set of rights granted by a state. Instead, citizenship should be understood as a constantly changing, interactive process contingent on formal documents, informal and formal institutions, and everyday practices.

Researchers theorising citizenship in Africa and Asia emphasise multilevel memberships over individual rights that extend beyond national boundaries (Mengisteab and Bereketeab 2012; Chung 2017; Kennedy and Brunold 2015). This emphasis is the result of the way these regions have been shaped by colonial legacies and the arbitrary formation of nation-states in the regions. Adopting these perspectives, we could argue that the communitarian tradition comes closest to providing a theoretical and conceptual framework for citizenship outside the global North. As the historical overview of the different theoretical traditions of citizenship has illustrated, the dominant scholarship on citizenship is based on case studies and theories developed and examined in the global North. These studies largely take for granted that citizenship policies and practices are consistent with fundamental liberal democratic beliefs and

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[15] Day-to-day practice implies, for instance, active political participation such as voting or organising strikes, or other engagements, such as cultural and social exchanges between persons in a community, which create a sense of belonging and exchange between citizens. Moreover, rights-claims, such as social benefits, are also day-to-day practices of citizenship (Wiener 1998). Thus, day-to-day citizenship practices can be legal or informal in nature.

that the boundaries of citizenship have developed with the nation-state in mind (Miller 2000). These distinguishing features can be challenged by investigating how citizenship has been theorised and conceptualised in various other socio-political contexts.

Broadly speaking, three different arguments emerge from this literature. First, rights and obligations are often regulated at the national level, but priorities are given to collective obligations over individual rights. Second, contrary to the idealised understanding of citizenship that is prevalent in many Western approaches, as promoting universal and equal rights, rights can be allocated differently to different community levels. What this means is that the right of voting might be a national right for all citizens, but certain social rights are the responsibilities of local institutions. As argued by Chung, 'these multiple memberships have led to the development of 'in-between' statuses that extend beyond the boundaries of the nation-state, excluding specific domestic populations based on colonial classifications, nationalist movements, kinship networks, religion, and/or spatial movements' (Chung 2017, 434). Third, the rights associated with liberal democratic citizenship are not necessarily guaranteed in other political contexts.

Kerry Kennedy and Andreas Brunold (2015) show that citizenship in Southeast Asia is characterised mainly by the prioritising of collective regulation over individual rights, and contingent membership over universal membership. Moreover, studies from Southeast Asia (Hirata 2015) show that identifications are not necessarily made to the national polity, but more strongly occurs at subnational and supranational levels. Furthermore, based on his evaluation of the Greater Horn region, Bereketeab (2012) argued that defining citizenship in Africa has always been at the centre of controversy and dispute. He states that 'the traditional African notion of citizenship is that no matter where you are born, you are the son or daughter of the original soil or homeland of the parent through whom you trace your decent. Ethnic citizenship is, therefore, the foundation for nationality in Africa' (Bereketeab 2012, 33).

Given that most migration in Africa is intra-regional, Bereketeab's statement highlights the arbitrariness of nation-state boundaries and suggests a subnational or supranational notion of belonging based on collective identity or ethnicity rather than on legal status provided by a nation-state government. In a way, his conceptualisation of citizenship in the region of East Africa shows parallels to the communitarian theorisation of citizenship as membership in a prepolitical, cultural community (Delanty 2002). This argument is also evident in the examination of citizenship in West Africa by Cyril Obi (2012), who, in examining national and regional notions of citizenship, explains that in West

Africa, people are often defined by their pre-colonial, communal belonging and allegiances, which have formed independently of the nation-state formation.

Although the lessons learned from Southeast Asia and Africa show some similarities in regard to the conceptualisation of citizenship, these regions are vastly different and have very divergent socio-political realities. However, common to both, and maybe especially evident in the African context, is the impact colonial rule and law had, and still has today, on citizenship and nationality. Colonialism left its mark on perceptions of citizenship. This resulted in citizenship being theorised as a multilevel concept and a membership status which operated differently in the pre-colonial, colonial, and post-colonial traditions (Manby 2009). Mahmood Mamdani (1996) reminds us that colonialism created two different categories of people: the citizen and the subject. The citizen speaks the language of rights, duties, and privileges and the subject the language of tradition and customs. In other words, subjects were not entitled to citizenship rights or equal status in the colonial territories, and this unequal dualism created two different publics, or sovereigns in the republican terminology of citizenship (Walzer 1989). On one hand, there was a central state governed by civil laws, which was the domain of the colonisers and the citizens, and on the other hand, a local state or native authorities enforced customary laws on the subjects (Adejumobi 2005).

When discussing the creation of two publics under colonial rule in Africa, Peter Ekeh (1975, 106) argues that 'the historical context of African politics, especially as it emerged from colonialism, has given a different character to African conceptions of citizenship from this Western model. In effect, citizenship has acquired various meanings, which depend on whether it is conceived in terms of the primordial public or the civic public'. Concerning the primordial public, individuals understand their citizenship in terms of moral duties to benefit the wider public, very similar in a way to the communitarian perception of a prepolitical community, as well as the republican emphasis on the importance of a shared, common good upheld by the citizens in a community.

In terms of rights, Ekeh further argues that what the individual gains back from his/her duties and obligations to the primordial public is 'intangible, immaterial benefits in the form of identity or psychological security' (Ekeh 1975, 107). In other words, recognition and a sense of belonging. However, in his research, he emphasises that the allegiance and feeling of responsibility towards the civic public were quite different to the primordial public. While it was important to be an active member of the primordial public and to sustain the community, it was more common to seek gains from the civic public

without having a moral urge to give back to it in exchange for the benefits it provided. As such, in the civic public, rights were emphasised as the dominant dimension of the citizenship relation, much as they are emphasised today by liberalism. On the contrary, some similarities can be seen between the primordial public citizenship understandings and the underlying conceptualisations of communitarian and civic republican citizenship.

Citizenship loci and boundaries

In the previous sections, I provided an overview of the different approaches to citizenship in 'Western' scholarship and explored citizenship as a contract, as practice. I then introduced approaches to citizenship reaching beyond the 'Western' theoretical and empirical experience. The different theoretical approaches tell us how the relationship between individuals and a polity is conceptualised and theorised according to various views. The theoretical perceptions inform the analytical framework of this thesis, which will be outlined in the next section. However, as the thesis takes an interest in membership in regional political communities, it is not enough to look at how previous research has theorised and conceptualised citizenship; we also need to look at how the nature of the political community in which citizenship is forged is perceived. This section introduces the main debates on transnational, regional, and global citizenship – all types of citizenship that transcend the national scale.

Due to the changing political position of nation-states during the past two decades, an increase in human mobility, and other globalisation factors – such as accelerated technological developments that enhance cross-border communication and connectivity – different types of citizenship beyond the nation-state have emerged (Bosniak 2000; Schlenker and Blatter 2014). In scholarly debates, citizenship is now also conceptualised as transnational (Collyer 2017; Iheduru 2011), denationalised (Bosniak 2000; Sassen 2005), supranational (Dobson 2012; Wiener 1998), and global (Cabrera 2010; Hernández-Truyol and Hawk 2005). These different types of citizenship share an emphasis on re-conceptualising of the notion of membership in new political communities (Ong 2006).

Thus, the boundaries of citizenship have changed over time, leading to new theoretical and conceptual debates. In a critique of Marshall's theory of citizenship, Bryan Turner (1990) argued that it lacked a proper theory of the state, which he claimed is a necessary component of a theory of citizenship. Giddens also pointed out that Marshall's theory was developed in reference to a nation-state that was (or seemed to be) immune to global forces. He argued that 'the problem with Marshall's theory is that it is no longer relevant in a

period of disorganised capitalism' (Giddens 1982, 195). This critique was developed further by Michael Mann (1987), who viewed Marshall's theory as ethnocentric, due to its focus on a homogenous British society. As Mann pointed out, there was no mention of any country other than Great Britain in Marshall's theory, leading us to question its applicability to more pluralistic societies or societies within or beyond the nation-state today.

Miller (2000) maintained that republican citizenship was better positioned than liberalism to respond to cultural pluralism. His argument rested upon a model of democratic decision-making, and the model of deliberative democracy wherein citizens can reach a substantial degree of consensus by openly discussing problems together (Miller 2000). However, the democratic, republican citizenship model Miller advocated can only accommodate cultural pluralism insofar as all groups are represented on equal terms. Given most societal structures today, Miller's argument might work in theory or for the dominant groups in a society, but not for marginalised and subjected people. Precisely because of this assumption, Michael Walzer (1989) claimed that republican citizenship only works in small, homogenous communities.

Like Miller, Richard Bellamy, another contemporary neo-republican thinker, also emphasised the importance of political participation to citizenship, although the two viewed the role of territory differently. Miller (2000) argued that the nation-state is the best political community for meeting the challenge of cultural pluralism today. In contrast, Bellamy (2000) argued that we ought to move away from the nation-state model and accept that today's politics operates within a complex plurality of interrelated units on different scales. Walzer also emphasised this argument, stating that 'the heterogeneity of modern states does not allow the kind of "moral unity" and mutual trust that has been projected onto the ancient polis, qualities deemed necessary to the functioning of republican institutions' (Walzer 1989, 214). In other words, Walzer claimed that the modern nation-state cannot be compared with the ancient polis and, as such, nor can the conceptualisation and practices of citizenship.

In this thesis, regional citizenship is seen as a type of citizenship that transcends the national boundary and is defined within a macro-region. It shares similarities with other types of citizenship that transcend the nation-state, such as transnational citizenship, as it combines more than one national polity. However, it is territorially bounded unlike global citizenship (Hettne 2000). Before outlining the concept of regional citizenship, this section turns to the two related types of citizenship beyond the nation-state: transnational citizenship and global citizenship. The theoretical and conceptual debates

around these types of citizenship are relevant for understanding and studying regional citizenship because they all are formed beyond the national polity.

Transnational citizenship denotes both formal legal cooperation between two nation-states, evidenced by holding dual citizenship and through the expression of a more informal notion of transnational belonging (Iheduru 2011; Collyer 2017). As Rainer Bauböck argued (1994), the rights and obligations of citizenship change when an individual leaves the territory of citizenship, but they do not disappear altogether. Since the 1980s, with increasing shifts in citizenship loci, there has been a growing awareness of established forms of non-territorial or extra-territorial citizenship. More and more nation-states have extended the rights and obligations of citizenship to those living permanently outside the national territory. In one of the earliest uses of the term transnational citizenship, Etienne Balibar (1988) argued that citizenship has always been linked to two distinctions. It is 'bound to the existence of the state' and 'bound to the acknowledged exercise of an individual's "capacity" to participate in political decisions' (Balibar 1988, 723). Thirty years later, however, the first of these distinctions is increasingly contested.

Regarding the definition of transnational citizenship, Jonathan Fox defined 'full' transnational citizenship as 'membership in more than one national political community' (Fox 2005). In a way, this broad definition could also be used as the definition of regional citizenship. Moreover, Fox argued that membership cannot be limited to the relationship between an individual and a state institution but must also be viewed in collective terms. Fundamental civil rights, such as the freedom of assembly, expression, protest, and religion, all have broader societal implications relating to collective action or communal solidarity. As argued by Fox, these rights may also be exercised transnationally (Fox 2005).

Contrary to transnational citizenship and regional citizenship, global citizenship is a non-territorial membership, or, maybe more precisely, a concept that views the world as one combined community. One way that scholars have viewed this concept is as citizenship in a 'world state' (Tan 2017). Here, citizenship is understood in a liberal way as a legal status where the legal membership is extended to a world government. Another account of global citizenship understands citizenship not in terms of legal membership but in terms of the functions of individuals and their capacities in democratic decision-making (Slaughter 2008). According to this understanding, the global citizen is not a citizen of the world in the legal and political sense, but an individual with the right and responsibility to participate in global decision-making through international institutions and organisations (Tan 2017). Thus,

this conceptualisation resembles the republican perception of citizenship as active participation in a community. Lastly, global citizenship has also been used in a normative way. Here, citizenship prescribes the perspective individuals should adopt when considering their moral obligations and duties to other people in the same community (Dower and Williams 2002). By emphasising global citizenship as shared norms, values, and duties, this third conceptualisation resembles a communitarian approach, emphasising morality and values over rights, legal status, and active participation.

Empirical research on transnational citizenship is diverse, abundant, and based on various theoretical perspectives (Bauböck 2003; Olsen 2012). Global citizenship, for instance, has received normative and theoretical attention, and extensive empirical examples have drawn on international human rights discourse (Cabrera 2010; Castles and Davidson 2000) or explored citizenship in the UN (Auvachez 2009). This research helps us understand and conceptualise regional citizenship because the concept shares elements with transnational and global citizenship, such as membership in more than one polity built on shared norms and values that cut across national borders. Moreover, Tilly's (2005) understanding of nation-states and the national scale can inspire conceptualisations of the regional scale. According to Tilly, the nation-state is a socially constructed space, continuously developing with no fixed borders. Thus, a region can be conceptualised as a flexible, ever-changing space formed by formal and informal networks. Because regions are socially constructed, they are also politically contested (Murphy 1991), meaning that regional citizenship may differ according to context.

Previous definitions of regional citizenship are derived primarily from the EU's concept of citizenship. Based on her empirical research, Strumia argues that the EU's concept of regional citizenship has three main characteristics: 1) a projection of citizenship beyond the state; 2) the articulation of this beyond-state citizenship within the boundaries of a supranational entity that is pursuing a collective purpose; and 3) the reconfiguration of citizenship beyond nationality via a dynamic of mutual recognition of national citizenships (Strumia 2017, 672). Although these three characteristics of EU citizenship can help us develop a better understanding of regional citizenship, they do not account for its specific theoretical or conceptual characteristics. Here, the literature drawing on empirical data from the African continent might further our understanding of regional citizenship. In his empirical account of citizenship in East Africa, Mengisteab (2012) claimed that citizenship can operate at three scales: the sub-national, the national, and the regional. He further states that 'a regional integration, which allows free mobility of labour and capital and extends other rights, creates an expansive regional citizenship'

(Mengisteab 2012, 9). In the next section, I focus on the regional level when discussing citizenship perceptions. In particular, the section outlines the literature on regional citizenship in different regions across the world.

Citizenship in regional organisations

Studies of citizenship regimes formed by regional organisations have increasingly moved beyond examining the most well-known and arguably most realised case, that of the European Union citizenship regime (Isin and Saward 2013; Strumia 2017)[16]. These studies investigate citizenship formation, regional mobility protocols, and the establishment of regional identities as part of the efforts to negotiate and define membership boundaries and parameters beyond the nation-state, in regions across Africa, South America, Asia, and the Middle East (Cabrera and Byrne 2021; Okom and Dada 2012; Giupponi 2017). I situate this thesis within this strand of literature.

In the South American context, scholars have examined regional citizenship formation in the Southern Common Market (Mercosur), which has recently established a formal regional citizenship regime, and they have explored citizenship formation in the Caribbean Community (CARICOM) and the Andean Community (CAN), which have both taken important steps towards the establishment of regional citizenship regimes. For instance, Diego Acosta (2018) analysed the institutional development of citizenship within and beyond the nation-states in South America, and in doing so, have criticised the feasibility of regional citizenship norms and policies in Mercosur, the Andean Community, and the Caribbean Community. His analysis showed that access to rights improved with the reconfiguration of citizenship status, but at the same time he highlighted the corresponding challenges to implementing citizenship regionally. Moreover, in examining the institutional changes to citizenship and regional rights in Mercosur, Olmos Giupponi (2011) accounted for the, at times, challenging relationship between regional citizenship rights and nationality laws. Furthermore, Marcelo Mondelli's research (2018) showcased the opportunities for, and the limitations of, constructing regional citizenship by investigating the Mercosur's Statute of Citizenship.

In addition to these sources, scholars have also explored citizenship education initiatives in the Caribbean Community (Jules and Arnold 2021) and investigated the institutional establishment of an Andean identity to foster a sense of regional citizenship (Prieto 2015). The literature on citizenship in regional organisations rooted in the South American context is vast and

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[16] In the European Union context, citizenship was formally established as a regional membership status within the organisations' framework with the 1992 Treaty of Maastricht, and several subsequent policies and protocols (Jenson 2007; Meehan 1993; Wiener 1998).

diverse. That said, this research tends to favour legal notions of citizenship or focusses on the implications of certain citizenship rights on migration issues. Although these studies are of great importance to the literature on citizenship in regional organisations, they also often treat the European Union as the 'model' for comparison, which might explain the tendency to treat citizenship as a legally defined status or at least favour empirical cases thereof. Thus, this thesis differs from the research conducted on South American cases by comparing formal and informal citizenship regimes across regional and socio-political contexts.

Within the Sub-Saharan Africa context, three regional organisations in particular have shown various initiatives on and steps towards establishing regional citizenship regimes: The Economic Community of West African States, the East African Community (EAC), and the South African Community (SADC). Among them, ECOWAS stands out as the most advanced organisation in terms of its legal framework (Ukaigwe 2016), and it has the most developed and institutionalised citizenship regime. In examining this regime, Okom and Dada (2012) have provided an outline of the acquisition of ECOWAS citizenship rights. However, their brief overview does not provide any analysis and fails to go beyond outlining the legal framework and definition of the regime. For her part, Carla Bettencourt (2018) shows that there is a relation between the ECOWAS citizenship regime and regional development but fails to account for the impact of regional citizenship status on the regional development objectives of ECOWAS.

In the context of ECOWAS, it is also important to mention Jerry Ukaigwe's (2016) publication on ECOWAS law, wherein he outlines the citizenship rights of an ECOWAS Community citizen and the legal definition of the ECOWAS citizenship regime. However, the scope of the book did not permit him to explore ECOWAS citizenship building. Habibu Bappah (2013) offers a more critical assessment of the ECOWAS citizenship regime by discussing supranational and subnational challenges that could hinder the success of regional citizenship in West Africa under ECOWAS. That said, by staying focused on institutionalisation challenges, such as 'artificial barriers set across the people by colonialism' (Bappah 2013, 4), she fails to account for any historical and contemporary regional citizenship developments. While the literature on the challenges surrounding ECOWAS citizenship law, acquisition, and institutionalisation is important for understanding the ECOWAS citizenship regime in general, this thesis expands our understanding by exploring the historical development of the regime, current formal and informal perceptions (article 3), and institutional practices of the regime from a comparative perspective (article 4).

In the Asian context, ASEAN, especially, has increasingly created initiatives aimed at establishing a regional citizenship regime. Importantly, scholars have examined the more recent efforts by ASEAN countries to 'educate for ASEANness' (Chanbanchong et al. 2015; Hirata 2015) as well as the senses of ASEAN citizenship among persons in the region (Baba 2016; Thompson et al. 2016). These studies showcase the national teaching of ASEAN norms and policies and empirically investigate notions of ASEANness. However, they do not account for how identification with the organisation might be conceptualised beyond the individual perceptions of the participants, which is a part of the discussion I present in article 2. In examining citizenship in ASEAN, especially worth highlighting is the recent publication by Luis Cabrera and Caitlin Byrne (2021), who, in applying their six-tired framework of citizenship, have examined the emerging ASEAN citizenship regime and, in doing so, have explored how ASEAN officials and affiliated ASEAN bodies increasingly employ the rhetoric of ASEAN citizenship, for instance as expressed in the first issue of the newly formed magazine *The ASEAN* (Hoi 2020).

In recent years, several cross-regional studies have also examined citizenship trends across regional contexts. For instance, Elisa Fornalé (2017) showcased the legal developments of certain citizenship rights – such as the right of movement – by comparing ASEAN and Mercosur policies. Päivi Neuvonen (2019) compared efforts by ASEAN, Mercosur, and ECOWAS to develop and reinforce common regional identities, and Cyril Obi (2012) discussed the ECOWAS community citizenship and its comparative applicability to the East African Community. The comparative literature is particularly relevant because it shows the similarities and differences across regional context with different socio-political histories. That said, the study by Obi (2012) is only an overview of certain citizenship policies within the African continental context. Fornalé (2017) limits her comparison to that of citizenship rights, and the comparative analysis by Neuvonen (2019) is focussed on regional identity making rather than citizenship formation. Thus, although I find inspiration within these comparative studies, this thesis moves further than the current literature by comparing different regimes, and in doing so, treating the ASEAN case study as more than an organisation with a shared identity formation objective, but, in line with scholars like Cabrera and Byrne (2021), as having an emerging citizenship regime.

The analytical framework

In the previous sections, I outlined the main normative and contemporary theoretical perspectives of citizenship, and I discussed how scholars have theorised citizenship as a contract and as practice. The theoretical and conceptual discussions show that citizenship has been approached from various perspectives and is subject to ongoing contestation over boundaries and meaning. Since the 18th century, citizenship has primarily been conceptualised as a membership status which grants recognition and protection to citizens of a sovereign, nation-state (Wiener 1998). Thus, citizens have rights and responsibilities within a bounded community. In this thesis, I use the broad understanding of citizenship as membership in a political community (Bauböck 2017). Following the theoretical perceptions and theorisations of citizenship discussed above, and in line with previous literature on citizenship regimes (Jenson 2007; Wiener 1998; Fourot et al. 2018), I prescribe three main dimensions as constitutive of citizenship: rights and duties, access to political participation, and a sense of belonging.

When regional organisations define citizenship in their institutional frameworks, they change the membership boundaries from the national to the regional. In doing so, regional citizenship regimes emerge. In this thesis, the concept of citizenship regime implies the way in which membership is governed. Thus, following Jane Jenson's definition (2007, 55), I understand citizenship regime as 'the institutional arrangements, rules and understandings that guide and shape concurrent policy decisions and expenditures of states'. These arrangements, rules, and understandings are framed by and within the political context of regional organisations. In order to operationalise the concept of citizenship regime, I further divide it into four individual dimensions: rights and duties, access to political participation, belonging and identity, and a responsibility mix. This four-tired framework is useful as an analytical tool for drawing out the different dimensions of the regional citizenship regimes of the comparative case study. Moreover, this framework is flexible and can be used to draw attention to the importance of each individual dimension of the regimes (Fourot et al. 2018). It can also be used to show and explain changes to citizenship regimes over time, by considering the changing dynamics between the four dimensions, thus making it possible to investigate the different processes of building citizenship regimes (Jenson 2007).

In this thesis, the way in which citizenship is conceptually understood and deployed as a framework derives from the extensive work and theoretical

influences by scholars such as Jane Jenson (2007), Jane Jenson and Susan Phillips (1996), Elise Auvachez (2009), and Antje Wiener (1998). Two different scholarly streams have, in particular, advanced the research on citizenship regimes: historical institutionalism and legal and political (comparative) research. Thus, before outlining the four dimensions of the concept of citizenship regime, I will briefly look at how these approaches have been used in the relevant literature. Scholars deploying the historical institutionalism approach have shed light on the relationship between the building of citizenship regimes and institution-building within a political community (Tilly 2005; Wiener 1998). These studies pay particular attention to the path-dependency between institution-building citizenship regimes, building within and beyond the nation-state polity (Jenson and Phillips 1996).

The other established approach to the study of citizenship regimes comes from comparative legal studies and political science more broadly. As national citizenship commonly prescribes legal status, comparative and single case studies have focused on constitutional and international law standards and their role in the making of citizenship regimes (Vink 2017). Of particular importance to this thesis is the focus these studies have on investigating constitutional traditions and the legal norms of colonial powers (Manby 2018) – and the ways in which these traditions and norms are still today impacting citizenship regimes in former colonised countries and regions today (Mamdani 1996). As Patrick Weil (2001) points out, historical and contemporary legal traditions play a key role in the formation of citizenship regimes both within and beyond a nation-state polity. Although legal traditions and norms matter to the formation of citizenship regimes, several scholars remind us to pay equal attention to informal norms and practices which are not rooted in legal agreements or policies (Wiener 1998; Jenson 2007; Auvachez 2009; Cabrera and Byrne 2021).

The theoretically informed analytical framework based on the concept of citizenship regime, as used in this thesis, draws inspiration from the work of Marshall (1950), who outlined core civil, political, and social rights. Moreover, the idea of change over time, which Marshall emphasised in his theorisation of citizenship, remains vital for our understanding of citizenship regimes. More recent work by scholars such as Jane Jenson (2007) and Antje Wiener (1998) also remind us that citizenship is a historical and social construct, and that its form and character ultimately vary. These perceptions also inform the analytical framework of thesis, which also draws inspiration from strands of literature that challenge the methodological nationalism within citizenship

studies (Meehan 1993; Bosniak 2000; Sassen 2005; Giddens 1982; Walzer 1989; Bellamy 2000).

Inspired by the theorisations of Marshall, Jenson, and Wiener, the analytical framework, moreover, stands on two theoretical legs. The first is the theorisation of citizenship as a contract, promoted especially in the work of Charles Tilly (1996, 2004, 2005) and other liberal scholars. The second is the theorisation of citizenship as practice, which has been particularly advanced by Wiener's work on European citizenship practices (1998, 2007, 2017). Tying these influences together, and interpreting them in light of the theoretical and conceptual underpinnings I discussed in the previous sections, allows us to make several claims about citizenship regimes: citizenship regimes are political constructions (Marshall 1950), contingent upon historical, political, and social factors (Jenson 2007), constantly changing and forming through formal and informal norms and policies (Wiener 1998), and consisting of rights and duties (Marshall 1950), access to political participation, a sense of belonging (Wiener 1998, Walzer 1989), and a responsibility mix (Jenson 2007, Auvachez 2009, Fourot et al. 2018). This literature is used as the theoretical underpinning of the comparative case study of this thesis. Before proceeding to an outline of the four dimensions,[17] I will first spell out some definitions and clarifications that underpin this framework.

First, the dimensions of a citizenship regime have equal weight, and there is no intrinsic hierarchy between them. However, these dimensions are not fixed but may be redefined and changed in accordance with contemporary political debates and realities of the polity establishing and developing them (Jenson and Phillips 1996). The responsibility mix dimension sheds light on the different institutions responsible for defining, developing, and implementing citizenship in a community. Thus, changes to these institutions may affect the dimensions of the citizenship regime and its design. Although there is no hierarchy between the dimensions, they are politically defined and motivated and illustrate the current political though of a community on membership status and boundaries. Therefore, there might be a noticeable implicit or explicit political focus on some dimensions over others, as we see in the case of ASEAN identity formation over rights establishments. It is important to note that while one dimension cannot replace another, they may reinforce each other. Thus, the dimensions may complement each other, and one dimension may develop due to the changes made in another. For instance,

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[17] Following this section, I provide a brief discussion of the four dimensions of a citizenship regime. However, for an overview of the operationalisation of each of these dimensions, see instead Chapter 4: Methodology.

regional belonging may develop if the dimension of rights becomes stronger and more accessible for regional citizens.

Second, being a regional citizen is contingent upon being a national citizen. This means that the relationship between having national citizenship and being a regional citizen is defined as a relationship where the former determines the latter. Thus, national citizenship and regional citizenship are complementary and overlap rather than compete (Wiener 1998; Jenson 2007; Jenson and Phillips 1996). The formation of regional citizenship regimes might challenge the nation-state as the sole granter of citizenship rights. However, it is a 'thinner' membership status and should, therefore, not be seen as overriding the national citizenship status but as one which builds on the premises of nationality. Therefore, the conceptualisation of national citizenship might still vary dramatically from the one defined and developed in a regional political community. A similar discussion is evident in the concepts of national identity and regional identity.

In analysing this dynamic within the European context, Michael Wintle argues that 'it may very often be the case that one level or type of loyalty within an identity is stronger than another, without entirely eclipsing the weaker ones; that is, one's primary loyalty can be to one's nation, while a meaningful identity also attaches to supranational institutions like a global religion, or to Europe' (Wintle 2005b). Therefore, although regional citizenship is categorically different from national citizenship, the two are not in conflict with one another. Regional citizenship is derived from one's member state nationality but with core differences in the dimensions of rights and access to movement across national borders, as claim-making is often more accessible and possible at the national level. It is also important to note that regional citizenships are not to be thought of as types of post-national citizenships (Strumia 2017). Because nationality is the entry point for being recognised as a regional citizen, regional citizenship is not post-national but rather a transformed type of membership, defined within a regional community.

Rights and duties

Through the recognition of rights and duties, a polity identifies who is entitled to membership status and included in the political community (Jenson 2007). This rights-based characterisation of national citizenship was articulated, among others, by T. H. Marshall (1950). Marshall's theorisation of citizenship as being progressively built by civil, political, and social rights continues to shape much of the political and social thought in citizenship studies

(Bloemraad 2018). In contemporary discussions on citizenship rights, scholars have sought to expand on Marshall's ideas but have also challenged his theorisation. Scholars like Engin Isin and Bryan Turner (2002) have added the dimensions of social and cultural rights to our understanding of what constitutes citizenship rights.

In their comprehensive approach to citizenship, Thomas Janoski and Bryan Gran (2002) highlight four different types of rights which are central to the concept of citizenship: legal and civil rights, political rights, social rights, and participatory rights. Thus, they perceive participatory rights as a separate right, in contrast to other scholars who include this aspect in the realm of political rights (Jenson 2007; Wiener 1998). Thus, in their effort to expand the conceptual understanding of citizenship rights, Janoski and Gran (2002) argue that legal and civil rights should be perceived as fundamental rights which create foundational laws, and which underline other types of citizenship rights, for instance the right to freedom, personal security rights, the right of representation, and the right of expression. The dimension of rights also includes various types of rights which can be grouped together as political rights. For instance, the right to participate in political processes such as voting are central political rights of citizens in a community (Jenson 2007). Moreover, and especially emphasised in the Marshallian theorisation of citizenship, social rights imply the right to healthcare, education, and social protection (Marshall 1950; Wiener 1998; Jenson 2007).

Of the three main theoretical perspectives I outlined in the previous sections, liberalism is the dominant political theory and philosophy in Western, democratic societies (Kymlicka 1990). Liberalism emphasises individualism and citizenship rights based on the logic of universalism, being equally granted to all citizens in the same community. Following the liberal theory of citizenship, developed by scholars such as Rawls (1993), Dahl (1986), and Marshall (1950), political and civil rights were introduced before social rights, due to the historical development of the institutions securing those types of rights. In return, citizens have corresponding obligations to the community and the state, such as obeying the law and paying taxes.

Contrary to liberal theory, communitarian and republican perspectives, developed especially by scholars such as Philip Pettit (1997), Amitai Etzioni (1995), and Michael Walzer (1990), emphasise group rights over individual rights. In this interpretation, group interests are considered more important than individual interests (Janoski and Gran 2002). Communitarians generally emphasise a just and collective society and oppose liberalism's focus on the

individual. Given this, limited attention is paid to the rights dimension of citizenship. Instead, collective obligations largely predominate over rights, with the goal of establishing a collective identity and a feeling of belonging among citizens of a political community (Walzer 1990). In summary, unlike liberalism, communitarianism and republicanism share a focus on obligations over rights. From this perspective, rights are not necessarily guaranteed through obligations, but rather, obligations exist to establish a coherent society and to ensure or uphold a common good (Etzioni 1995; Walzer 1990).

In terms of the loci of citizenship rights, a nation-state government is still the primary granter of citizenship rights. However, with global processes and the development of international human rights norms, the nation-state is no longer the sole granter of rights. The international human rights regime is designed to implement standards and agreements on the treatment of individuals by states. Thus, these standards represent an alternative means to claim rights that transcend national jurisdictions (Soysal 1994; Evans 2000). Although rights can be formulated and claimed within and beyond a national territory, rights guaranteed by regional organisations, or the international human rights regime, are not self-executing and are made available to individuals through their nationalities. In other words, regional citizenship rights, as well as other benefits, derive from a national citizenship status. Even where states are part of a regional organisation that provides regional citizenship, citizens may still face different constraints when trying to claim their rights from a supranational entity[18] (Bloemraad et al. 2008). Some scholars argue that the problem lies with defining citizenship in terms of the passive possession of rights, rather than focusing more on active participation (Kymlicka and Norman 1994; Young 1989; Mouffe 1992). The attention to rights, especially promoted by liberal scholars of citizenship, has thus received criticism over the theorisation of citizenship as passive and formal (Kartal 2001), with scholars arguing that this perception is excessively individualistic and ethnocentric (Giddens 1982; Bloemraad et al. 2008).

Access to political participation

Access to political participation illustrates how the relationship between a polity and the citizens work in practise. Institutional norms, rules, and regulations set the terms for how access is granted and obtained in a political

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[18] The development of formalised arenas for claiming rights, such as the ECOWAS Community Court of Justice, challenge this notion, cannot alleviate all problems associated with claiming rights arising from regional citizenship.

community (Wiener 1998). Some scholars have used the term political participation (Bloemraad 2018) and participatory practices (Schlenker and Blatter 2014) when referring to this aspect of a citizenship regime. In this thesis, I use the term access to political participation to capture both *de jure* access to participation and *de facto* access to participation in a political community. Regional organisations are increasingly opening their political decision-making processes, often involving non-governmental and international organisations to varying degrees. As a result, internal mechanisms for securing and optimising this access to participation on a regional level are developing. This development is an example of what I mean by *de facto* access, where political participation is obtained indirectly through engagement in civil society. However, legal instruments also provide a direct, *de jure* access through voting (Auvachez 2009).

Liberal theoretical perspectives emphasise that political participation in a community is optional, and that the polity's protection is achieved by being recognised as having rights and a legal status (Bauböck 2017). In contrast, republicans emphasise the role of collective duties and access to participation as constitutive elements of citizenship. They reverse the relationship between citizens and the polity so that rights are not necessarily granted but are a result of participation in political matters (Bellamy 2000). As a critique of liberalism and its promotion of (passive) rights granted by a polity, republican theoretical perspectives emphasise active participation in a community to influence everyday politics. Thus, civic republicans and participatory democrats often speak of citizenship in descriptive terms to characterise the degree and nature of public involvement by members of a polity.

While liberal theorisations commonly pay little attention to civic activity and political participation in defining citizenship, republicanism favours the common good established and pursued through active participation (Mouffe 1992). However, this term is often deployed as a normative ideal, wherein citizenship is understood ideally as '*active* membership in a political community' (Beiner 1992, 105). However, historically, this dimension has been available to few citizens, and people have been excluded from accessing political participation due to factors such as ethnicity, religion, gender, or class (Bloemraad et al. 2008), a dynamic that continues to shape access across communities today. To maintain a participating community in Western, democratic, and liberal societies, Chantal Mouffe (1992) has suggested focussing on constructing stronger bonds between citizens. In this way, republican and communitarian approaches to accessing to participation can

serve as a means to establish a collective identity among people in a community (Delanty 2002).

With regards to the access dimension of citizenship, scholars who focus on citizenship in communities beyond the nation-state have studied forms of access to political participation that transcend a single nation-state community (Cohen 2008). According to Richard Falk (2002), cross-border organisational activities can be interpreted as practices of citizenship beyond a nation-state when citizens engage politically through the work of transnational and regional non-governmental and international organisations, grassroot organisations, and other non-state actors that work on political issues which cut across borders. Falk (2002) views such transnational or regional activities as part of a global citizenship discourse and as new ways of accessing citizenship rights and making claims. Similarity, Warren Magnusson (1996, 9–10) points out that transnational social movements 'involve people in active citizenship and thus lay claim to a political space that may or may not conform to the spaces allowed by the existing system of government'. That said, Dimitry Kochenov (2017) reminds us that citizenship can really only be practised in a meaningful way within a distinct institutional context, understood as a formal, organised, territory-based community with some degree of sovereign self-governance. However, although transnational political activism might not classify as a formal, organised community, scholars have argued that cross-border activism represents a new form of citizenship (claim) beyond a nation-state (Lister and Pia 2008; Auvachez 2009). This dimension of a citizenship regime implies direct political access to, for instance, voting in a political community, as well as the possibility of accessing political discussions and decision-making procedures indirectly through work in NGOs or with other non-state actors.

Belonging and identity

The third dimension refers to the legal recognition of membership and to the more fluid notion of feeling a sense of belonging in a community. Thus, this aspect of a citizenship regime relates to the feelings of belonging of individuals within a region and official views on belonging propagated by a polity thereby defining insiders and outsiders (Joppke 2007; Jenson 2007). The literature on belonging – and the often interchangeably used term identity – has received substantial attention in citizenship studies, especially in connection to personal feelings of belonging in different political communities (Bloemraad et al. 2008; Bereketeab 2011). The institutional, 'top-down' type of belonging which is created by regional organisations as part of the citizenship regimes differs

from the notion of regional belonging that can be created 'from below'. The latter is understood to be a broader concept and has received substantially more attention within scholarly debates (Oelsner 2013).

In citizenship studies, different theoretical streams inform the various conceptualisations of the dimension of belonging[19]. Approaching this concept from a communitarian perspective, rights are understood as 'tools' to construct a coherent community and the feeling of belonging. Liberalism, on the other hand, views the dimension of belonging as something that follows from having a legal status with rights and duties. Thus, the communitarian perceptions emphasise belonging as the constitutive element of citizenship and as closely linked to the social construction of communities. According to Amitai Etzioni (1995), citizenship only becomes meaningful because it is built on a shared sense of belonging and identity. Etzioni argues that having citizenship status is not just a question of having certain rights but rather a way to create a moral community. However, in Etzioni's communitarian inspired understandings of citizenship, he does not account for the state's role or the role of any other state-like political entity. Instead, he argues that it is spaces like the family or a school that constructs belonging for the individual.

Within citizenship studies, belonging has traditionally been treated as tantamount to national identity (Miller 2000; Dietz 1989; Wiener 1998). However, this view has gradually been challenged by notions of multilevel identity (Maas 2017) and increased scholarly attention to processes of identity formation within and beyond the nation-state (Delanty 1996; Paasi 2009; Kennedy and Brunold 2015; Obi 2012; Neuvonen 2019). Thus, some scholars question the assumption that the feeling of national belonging fundamentally characterises people's sense of citizenship and argue that people may maintain greater allegiances to – and identifications with – certain cultural and social groups within the nation-state or across national boundaries (Young 1989; Chung 2017). This argument might be especially relevant to regions outside the global North and in former colonial countries which were established through the arbitrary and violent practices of colonialism (Mamdani 1996). Increased movement of people across borders and transnational social and political communities have created senses of belonging which are increasingly felt in communities across national borders. The existence of supranational communities has resulted in the development of a type of belonging that arises

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[19] Theoretical, conceptual, and empirical discussions on the concept of identity and belonging are vast and numerous and have been approached from several academic disciplines. Thus, I have focused on approaching these concepts from the view of citizenship and understood as central components of the concept of citizenship.

out of 'networks, activities, patterns of living and ideologies that span the home and the host society' (Basch et al. 1994, 3–4). In other words, belonging is not confined to the nation-state's parameters but transcends national borders and is established at different community levels simultaneously (Bosniak 2000; Wintle 2005a).

Consequently, the dimension of belonging has two sides. The first implies a type of identity, which 'is formalised by legal linkages of belonging to a sovereign entity' (Wiener 1998, 26). This constitutional type of belonging in a national political community is protected on the basis of being a national of the community, a status that is proven through passports or ID cards. The second type of belonging derives from exchanges and (social) engagement between citizens and a polity, and especially between citizens within the community. This more 'fluid' type of belonging evolves through different social practices on the basis of shared history, culture, language and so forth, or through formal criteria such as legal recognition. In doing so, it creates a bond or a tie (Tilly 1996) between people in a community (Wiener 1998). The constitutional notion of identity and the more 'fluid' notion of belonging are deeply connected. They may also overlap as a sense of belonging might be fostered by social practices in a community and evolve due to legal recognition and having a status with specific rights different to those of 'outsiders'.

The responsibility mix

The fourth dimension of a citizenship regime defines the boundaries of citizenship responsibilities for different actors in a community and across different polity levels. Thus, the term responsibility mix means the allocation of citizenship responsibilities to actors, such as a regional organisation, its affiliated institutions, such as the parliament or court, but also to non-governmental and international organisations, non-state actors, and the citizens themselves (Jenson 2007). The recent emphasis on extending the boundaries of citizenship rights, of access to political participation, and of legal recognition and a sense of belonging in regional organisations has created a multileveled responsibility mix as a space where various actors and institutions hold responsibilities towards citizens. Thus, similar to the concept of identity or citizenship, the concept of responsibility mix is multileveled, and it operates or exists at various levels within and beyond the national polity. As such, the national and regional responsibility mix are deeply connected and overlap (Fourot et al. 2018). The formation of citizenship-related policies beyond a nation-state means that citizenship is not exclusively the state's responsibility.

Instead, as Élise Auvachez (2009) contends, the governing polity's responsibility is intertwined with other institutions. In other words, the responsibility sheds light on which institutions in a political community have obligations and duties towards the citizens – for instance, the court holds the responsibility for citizens to make claims against unlawful treatment for instance (Jenson 2007).

The responsibility mix has two axes. The horizontal axis positions the actors involved in citizenship practices in a political community, such as national states, a regional organisation, or NGOs. The vertical axis links the different government levels, thereby outlining the responsibility mix's multileveled nature which cut across different community levels (Auvachez 2009). In the previous three sections, I outlined how rights, access to political participation, and a sense of belonging have been conceptualised in communities beyond a nation-state. The responsibility mix shows that these dimensions are granted and constructed by actors at different community levels and that the national and supranational levels do not exist in opposition but may overlap.

Consequently, this fourth dimension of the concept of citizenship regime sheds light on how national and regional institutional responsibilities interconnect (Jenson 2007). As outlined in the section above, increasing access to participation, which is shaped by including the access of non-state actors and NGOs in decision making processes, contributes to the transformation of citizenship regimes. It establishes a multileveled citizenship responsibility mix wherein NGOs, for instance, are more involved in formulating citizenship-related policies. Thus, paying attention to the evolving responsibility mixes in the two cases that are examined necessitates unpacking the actors involved in defining and developing regional citizenship.

4
Methodology

In this chapter, I discuss the methodological choices I have made and their implications for the thesis. The chapter is divided into four parts. In the first section, I describe the comparative case study (CCS) approach and the case selection rationale of the thesis. In the second section, I discuss the research methods and materials used to conduct the comparative case study, including reflections on the use of the research methods and their limitations. In the third section, I discuss the analysis of data and the operationalisation of the four dimensions of the analytical framework, thus outlining how I conducted the comparative case study. This section also entails a brief discussion of the study's reliability and validity. Lastly, the chapter includes a section on ethical considerations and challenges, especially during field research, including reflections on the challenges of interviewing 'elites', gaining access to data, and considerations of my positionality as a doctoral researcher.

The comparative case study approach

The thesis seeks to investigate how regional citizenship regimes vary, and in doing so it adopts a qualitative, comparative case study methodology. In general, we consider research to be comparative when two or more cases are contrasted in the effort to explore similarities and/or differences among the cases (Azarian 2011). Thus, the rationale for analysing a small number of cases (small-N analysis) is that the comparative method simultaneously allows for an in-depth analysis whilst having the possibility of generalising the research findings across contexts (George and Bennett 2005). By this means, case-specific findings help provide empirical insights that are useful for the exploration and understanding of another case as well as the broader phenomenon which the case represents.

I use the comparative case study (CCS) approach, specifically the variant developed by Lesley Bartlett and Frances Vavrus (2017a, 2017b, 2020). This comparative approach 'provides a methodological framework to study how

policies are formed and adapted across time in different settings and scales'
(Sakata et al. 2021, 193). It is a useful methodological approach to comparisons
for this thesis as it is formulated in a relatively open manner, setting it apart
from other comparative methodologies (Tarrow 2010; George and Bennett
2005). Bartlett and Vavrus argue that comparative methods often give
variables a central role and maintain that 'the "controlled" or "paired
comparison" method often relies on case selection strategies that minimize or
maximize differences in presumed independent and dependent variables'
(Bartlett and Vavrus 2020). This is also often the case with the 'most-similar'
and 'most-different' systems of analysis (Przeworski and Teune 1970) or the
comparative methodology developed by John Stuart Mill.

Highlighting what sets the CCS approach apart from other comparative
approaches, Bartlett and Vavrus (2017b) point out that variable-oriented
comparative approaches often justify the comparison based on 'positivist
notions of validity, reliability, and generalizability'. Instead of promoting a
variable-oriented comparative methodology, the comparative case study
approach implies a focus on the cases which are being compared and 'engages
two logics of comparison: first, the more common compare and contrast logic;
and second, a "tracing across" sites or scales' (Bartlett and Vavrus 2017a, 6).
The latter logic of comparison, especially, sets this approach apart from other
methodologies. What Bartlett and Vavrus mean by tracing across sites or scales
is that they call for comparison across three axes: horizontal, vertical, and
transversal. The horizontal axis 'not only contrasts one case with another, but
also traces social actors, documents, or other influences across these cases'
(Bartlett and Vavrus 2017a, 14). The vertical axis looks at the 'comparison of
influences at different levels, from the international to the national to regional
and local scales' (Bartlett and Vavrus 2017a, 14), and the transversal axis
makes comparison over time.

Following this method and its logic, the context of the two cases discussed
in this thesis are not defined as fixed and stable locations of citizenship, but
rather as relational and flexible. No place is unaffected by socio-historical
events and processes which constantly interact with the 'case' studied. Thus,
the contexts of ECOWAS and ASEAN are contexts or settings which are
'constituted by social activities and social interactions' (Bartlett and Vavrus
2017a, 12). I have chosen to use the comparative case study approach in the
thesis because this methodology makes it possible for me to investigate the two
different citizenship regimes, compare the empirical findings from the field
research in West Africa and Southeast Asia, and to discuss these findings
individually and comparatively in line with how they cut across the regional
socio-political contexts and scales. Thus, the overall methodology which

guides the thesis is the comparative case study approach. However, since this is a compilation thesis consisting of the main text, the *Kappa*, and four journal articles, there is a degree of variance in the way I use different methods and research design approaches. In article 1 I use a structured and focused comparison, in articles 2 and 3 I use single case study methodology, and in article 4 I employ the comparative case study approach.

The first article follows the logic of the method of structured, focused comparison developed by Alexander George and Andrew Bennett (2005). Although applied in a somewhat less rigid manner, the method of article one is defined as structured because it sets out to explore the same question 'asked of each case under study to guide and standardize data collection, thereby making systematic comparison and cumulation of the findings of the cases possible' (2005, 67). Moreover, the method is focused as it 'deals only with certain aspects of the historical cases examined' (2005, 67). The comparative analysis of the first article draws on written sources and institutional documents of eight regional organisations which have, to varying degrees, developed policies on regional belonging, political access, and the rights allocated to citizens of a member state of the organisation.

I deployed a three-tiered conceptual framework consisting of the three constitutive dimensions of citizenship: rights, access, and belonging (Wiener 1998), in order to map out the differences and similarities between the emphasis on citizenship (and the four dimensions) in each organisation. The comparative overview and the exercise of mapping citizenship in regional organisations provided an initial overview of this regional phenomenon and shed light on the various cases of citizenship in regional organisations across socio-political contexts. Moreover, it provided a brief and preliminary overview of some institutional similarities and differences in citizenship and citizenship-related policies across the organisations.

The second and third article both deploy the single case study methodology, which I use to provide an in-depth and context-specific understanding of the emerging ASEAN citizenship regime (article 2) and the institutional perceptions of the more established ECOWAS citizenship regime (article 3). The single case study method allowed me to conduct an empirically grounded examination of 'a contemporary phenomenon in depth and within its real-world context' (Yin 2014, 16). Choosing to focus on two cases of regional citizenship regimes allowed for examining multiple understandings of the same phenomenon, rooted in specific and different regional contexts affecting the formation and institutionalisation of the regimes. Thus, the methodological choice of focusing on a single regional organisation and its citizenship regime in each of the articles rests on the premise that the single case study

methodology allows for examining the particularities of each of the citizenship regimes separately – how they are perceived and conceptualised, and how they have been developed and institutionalised.

The comparative approach deployed in the fourth article is the same one that guides the thesis as a whole, i.e. the comparative case study (CCS) approach. As previously described, this approach is characterised as a case study-oriented comparison of similarities and differences across contexts and implies comparing across sites or scales (Bartlett and Vavrus 2017a). Adapting what Bartlett and Vavrus call *process orientation* (2017a) is essential to the comparative case study approach. Methodological approaches which focus on processes tend to understand the world in terms of 'people, situations, events, and the processes that connect these' (Bartlett and Vavrus 2017a, 8). Moreover, the CCS approach commonly does not begin by exploring a 'bounded case', such as a regional organisation. Instead, what Bartlett and Vavrus (2017b) call for is the separation of the phenomenon studied and the context. Thus, in the case of the overall thesis and article 4, the phenomenon studied and compared is not so much the regional organisations, but rather the regional citizenship regimes themselves.

These cases, the ECOWAS and ASEAN citizenship regimes, are the phenomena which I seek to understand. The comparative case study is informed by the ambition to trace and identify the development of the institutional policies and initiatives across sites and scales to understand how the regional citizenship regimes came into being, how they have been perceived and formed by different actors, how they are changing and transformed, and also how they compare and contrast. The rationale for selecting the ECOWAS and ASEAN citizenship regimes as the two comparative cases of the thesis will be the focus of the next section.

Case selection

The comparative study is based on empirical examinations of two cases[20]: the citizenship regimes of the Economic Community of West African States (ECOWAS) and the citizenship regime of the Association of Southeast Asian Nations (ASEAN). Consequently, this thesis advances a qualitative, comparative case study of two different regional organisations' citizenship regimes, which transcend each of the organisations member states' national citizenship regimes, and which are defined, developed, and institutionalised

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[20] The thesis focuses on two regional organisations' citizenship regimes, that of ECOWAS and ASEAN. However, article 1 provides an overview of citizenship in eight regional organisations, thus examining and introducing the general phenomenon and showcasing the differences between citizenship in regional organisations across the world. That said, the primary comparative case study analysis of this thesis is conducted based on the regional citizenship regimes of ECOWAS and ASEAN.

within the regional political boundaries set by the two organisations. In a comparative case study, cases are commonly chosen based on their particular importance for the research objectives and on how they each compare or interact with one another (Collier 1991). In selecting these two regional citizenship regimes, I have also drawn inspiration from the work of Sheila Jasanoff (2005), who argues that social structures are disposed to continual modification and change, and, thus, that the use of the comparative methodology works best, 'when the entities to be compared are different enough to present interesting contrasts, yet similar enough for the variations to be disciplined' (2005, 29). The ECOWAS and ASEAN citizenship regimes are good examples of such comparable entities because, at first glance, they appear to be very different cases, but by qualitatively and comparatively exploring them, institutional similarities between their legal and non-legal citizenship regimes emerge.

The theoretical and conceptual debates in citizenship studies on types of citizenship within and beyond the nation-state guided my interest and research focus with regard to the 'unit' of analysis. I found the conceptual and theoretical discussion of regional citizenship fascinating but realised that this concept had primarily been empirically approached by examining the socio-political context of Europe and the EU. Thus, while some scholars might find a particular context interesting, my interest was in understanding a broader phenomenon and thus I selected two different empirical settings that would allow me to explore the phenomenon by comparing two different and distinct cases. In doing so, I followed Bartlett and Vavrus's logic of theoretical case selection and their argument for 'waiving an empirical definition of cases in favour of a theoretical one' (Bartlett and Vavrus 2017b, 116). In this view, based on a scholar's interest in a certain concept, cases are selected – in this case regional citizenship regimes – and then used for making a comparative case study (Ragin 1992; Bartlett and Vavrus 2017b) – in this case exploring this concept in the two regional organisations of ECOWAS and ASEAN. This approach to case selection meant that I initiated the study by mapping out the universe of cases (article 1), or in other words, familiarising myself with the question of *what is this a case of?* (Ragin 1992, 6).

When selecting cases, a common strategy is to look for typical, diverse, extreme, deviant, influential, most different, or most similar cases (Bartlett and Vavrus 2017b). However, because this study does not aspire to produce statistical generalisability based on the empirical findings of the comparison, I did not follow this case selection strategy strictly. Instead, I tried to think of the case selection process as a way for me to maximise the potential of accounting for variation, especially between under-researched cases of

regional citizenship regimes, in different socio-political contexts, but with enough parallels to make for interesting and new discoveries. Thus, the regional citizenship regimes of ECOWAS and ASEAN are interesting to explore comparatively as they represent different types of the same concept. I decided to focus the comparative case study on these two regimes because they showed divergence regarding the legality of the regional memberships, the processes of establishing and institutionalising the regimes, and in their institutional functioning, but they also exhibited similarities. As such there are comparable institutional features such as the historical institutional relation between citizenship formation and regionalism, the establishment of people-centric regionalism through citizenship policies and practices, and the particular emphasis on identity formation through the development of formal and informal citizenship policies.

To sum up my reason for conducting the comparative case study of the citizenship regimes of ECOWAS and ASEAN is that they have enough similarities to be comparable but also show significant variation and thus can shed light on how the concept of regional citizenship regimes develops outside of specific, socio-political contexts. Consequently, the comparative study of these two different regional citizenship regimes helps further the conceptual and theoretical understanding of the two regimes as well as citizenship regimes as a broader socio-political phenomenon.

Research methods and materials

Comparative case study research commonly relies on multiple sources of evidence (Sakata et al. 2021; Bartlett and Vavrus 2017b; Yin 2014). To conduct the comparative case study analysis of the ECOWAS and ASEAN citizenship regimes, I chose two primary data collection methods: semi-structured interviews and document analysis. I combined these two research methods because they allowed me to approach the comparative study of the two regional citizenship regimes based on the logic described by Bartlett and Vavrus (2020). The material gathered from the semi-structured interviews and the written materials allowed me to pay attention to the horizontal, vertical, and transversal axes of the study. In particular, the findings from the two methods made it possible for me to compare how similar policies and practices unfold across sites at similar levels, to pay attention to the micro-, meso-, and macro-levels, and to trace the regional citizenship regimes over time (Bartlett and Vavrus 2017b, 2020).

Moreover, the combined research methods helped increase the validity of empirical findings gathered during field research. The methods complemented each other and allowed me to gather nuanced data on the two citizenship

regimes. In particular, the document analysis offered insights into the institutional frameworks and official statements of the regimes. The use of semi-structured interviews with officials at ECOWAS and ASEAN let me dig beneath and beyond the official record, illuminating the thoughts behind the official statements. They also allowed me to critically discuss and challenge each organisation's institutional citizenship vocabulary. In the following two sub-sections, I discuss the research methods, their advantages and disadvantages, and the strengths and weaknesses of the collected data. I also provide information on the location and roles of the interviewees as well as the types of written material used for the document analysis.

Written materials

For the comparative case study analysis, I draw on a vast number of written materials, such as primary sources from the two organisations, and secondary sources such as academic publications and research reports. Due to the aim of researching how ECOWAS and ASEAN establish and institutionalise regional citizenship policies and practices, I primarily analysed the two organisations' institutional documents. These include but are not limited to protocols, charters, treaties, statements, policies, action plans, internal notes and reports, conventions, decisions, visions, blueprints, and written material from the organisations' websites. The aim in analysing these institutional documents was twofold: first, they provide the official definition and institutional framing of citizenship and citizenship-related policies put forward by each regional organisation. Second, they complement and contextualise the empirical research and thereby provide an understanding of the institutional opinions and framings of the two citizenship regimes.

To analyse the emerging ASEAN citizenship regime and gain insight into the institutional choices and events which led to the 'rights-turn' and the increasing focus on establishing membership rights regionally, I analysed several important institutional documents. Documents of particular importance were the ASEAN Charter, the 1997 ASEAN Vision, the three Community Pillars Blueprints, the ASEAN Human Rights Declaration, the 2006 ASEAN Framework Agreement on Visa Exemption, the 2018 ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers, the Masterplan on ASEAN Connectivity 2025, and the first ASEAN Magazine *The ASEAN* of 2020. For examining the ECOWAS citizenship regime, the most important documents were the 1975 Treaty and the 1993 Revised Treaty, the 1979 Protocol Relating to Free Movement of Persons, Residence, and Establishment, the 1982 Protocol Relating to the Definition of Community Citizen, the 1999 Protocol Relating to the Mechanism for Conflict Prevention,

Management, Resolution, Peacekeeping and Security, the 2001 Supplementary Protocol on Democracy and Governance, the 1991 Protocol of the ECOWAS Community Court of Justice, the 1994 Protocol of ECOWAS Parliament, and the Vision 2020.

As with the interviews, these institutional documents served to illuminate the decisions over and development of citizenship and citizenship-related policies and initiatives. The documents were easily accessible through the organisations' webpages. During the interviews at the ASEAN Secretariat and the ECOWAS Commission, several officers also provided printed copies of the documents we discussed during the interviews. The link between the interviews and the document analysis is very strong, and the two data sources should, therefore, not be viewed as separate but as inter-related. I often discussed the documents with officers who provided vital insights into the contents and institutional significance of the documents and to the role of these documents and how they were perceived within the organisation. For instance, even though some documents seemed to be of great importance to the formation of the two citizenship regimes, they were, in fact, used as 'window-dressing'. In other instances, they had only a symbolic meaning within the organisation but had no bearing on policy. I also often experienced the opposite: officers emphasised sections in documents which I had not previously thought of as important. The question of legality also played a significant role. During the interviews it became possible to discuss the legality and implementation possibilities and obstacles for the policies outlined in the documents, and an individual officer's role in formulating and institutionalising the citizenship regimes. Both aspects are relevant for understanding the regional citizenship regimes but could not be analysed through reading the policies alone.

Interviews

The comparative case study relies on data which I collected during interviews conducted in Southeast Asia from November 2018 to February 2019 and in West Africa from October to December 2019. During the two field research periods, I conducted a total of 49 interviews. Interviewing is one of the most widely used methods in qualitative research, commonly categorised as unstructured interviews and semi-structured interviews (Bryman 2012). In this thesis, I used the method of semi-structured interviews as it allowed me to 'keep more of an open mind about the contours of what he or she needs to know about so that concepts and theories can emerge out of the data' (Bryman 2012, 12). Thus, the interviews were steered by a pre-formulated set of broad questions covering the main issues and themes I wanted to gain answers to and

comments on. However, while the themes and questions of discussion were the same in both my field sites, in order to provide data for the comparison, I re-evaluated the interview guide during fieldwork to adapt it to the respective context and the person interviewed.

I developed the interview guide on the basis of the analytical framework,[21] meaning that the thematic issues discussed during interviews were based on the four constitutive dimensions of a citizenship regime: rights and duties, access to political participation, belonging, and the responsibility mix. Based on the framework, the aim of the interviews was twofold: first, this method helped me obtain answers to specific questions about the four citizenship dimensions, the regional citizenship regimes at large, and the organisations claim to advance people-centred regionalism. Second, the interviews helped me gain nuanced and oftentimes more critical insights into the institutional agreements, policies, and protocols and thereby directed my attention to issues and discussions that were otherwise not apparent from the written materials.

Consequently, the questions guiding the interviews were formulated as both precise and specific questions on certain policies or institutional initiatives, while more open-ended questions explored 'narrative information' (Ayres 2012), such as: *what do you think is important for me to know about ASEAN governance? Or what does citizenship mean to you?* The interviews proved crucial in providing ways to study the two regional citizenship regimes, as policies, internal notes, agreements, and discussions were presented to me during the interviews which were otherwise not available at the ECOWAS Commission library and archive or at the ASEAN Secretariat library. Finally, the interviews as well as the many informal meetings I had at the ECOWAS Commission café, the ASEAN Secretariat Museum, and at the ASEAN lobby restaurant provided me with a deeper understanding of the governance structure and institutional norms of ECOWAS and ASEAN and shaped my theorisation and conceptualisation of the two organisations' citizenship regimes.

During the field research period in Southeast Asia, I conducted interviews in five of the ten ASEAN member states. The majority of interviews took place in Jakarta, Indonesia, where the ASEAN Secretariat is located. However, due to the institutional design of ASEAN, which is best described as decentralised (Cabrera and Byrne 2021), and the fact that country representatives to ASEAN institutions, such as the ASEAN Intergovernmental Commission on Human Rights (AICHR), primarily work from their home countries, I also conducted interviews in Bangkok and Chiang Mai in Thailand; in Singapore; in Kuala Lumpur in Malaysia; and in Yangon in Myanmar. In contrast, the interviews I

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[21] The general interview guide is found in Appendix 1.

conducted on the ECOWAS citizenship regime all took place in Abuja, Nigeria. Contrary to ASEAN, ECOWAS is a more centralised organisation (Ukaigwe 2016), hence most of the ECOWAS institutions, including the ECOWAS Commission, are based in the capital of Nigeria.

The interviews in Southeast Asia and Abuja can broadly be divided into two overall groups: first, officers of ECOWAS and ASEAN and of their affiliated institutions, and second, employees at non-governmental and international organisations who work with the two regional organisations or engage with their regional citizenship regimes. During my fieldwork in Southeast Asia, I conducted interviews with officials working at each of the three community pillars of ASEAN: the ASEAN Political-Security Community (APSC), The ASEAN Economic Community (AEC), and the ASEAN Socio-Cultural Community (ASCC). These officers had specific expertise on working with regional identity formation schemes, the ASEAN connectivity plan, and regional rights in the dimensions of healthcare, education, and social protection. Moreover, the officers also worked on border management policies and cooperation among ASEAN member states on migration, mobility, and integration. I met with officers from the External Relations Division, the ASEAN Human Rights Division, the ASEAN Commission on Women and Children (ACWC), the Labour and Civil Service Division, the Poverty Eradication and Gender Division, the ASEAN Foundation, and the ASEAN Intergovernmental Commission on Human Rights (AICHR).

The reason I met with these officers is that they all had roles working on citizenship and citizenship-related policies, each representing a different policy perspective. Moreover, I conducted several meetings with country representatives to AICHR. The rationale for meeting with the Indonesian, Thai, and Singaporean representatives to AICHR was that each person represented a different political perspective within the ASEAN human rights mechanism. Thus, each provided different critical answers to the research questions. For instance, the representative from Singapore had been an employee of ASEAN for more than forty years, and he provided a critical, historical account of ASEAN and insights into how institutional views on citizenship and citizenship-related policies had developed and changed over time. The Thai representative came from a civil society background, and his work for AICHR focused primarily on establishing a better connection between civil society and ASEAN institutions. Indonesia's representative was a professor in political science, and her academic expertise and often more critical reflections on ASEAN, particularly on her work concerning the improvement of women and children's rights, provided helpful insights into

the discussion of the 'rights-turn' in ASEAN and its people-centric governance agenda.

During fieldwork in West Africa, I conducted interviews with officers from six departments at the ECOWAS Commission: the Department of Trade, Custom and Free Movement, the Department of Infrastructure, the Department of Political Affairs Peace and Security, the Department of Social Affairs and Gender, the Department of Education, Science, and Culture, and the Department of Macro Economic Policy and Economic Research. Additionally, I conducted interviews with officers at the Office of the Vice-Chair of the ECOWAS Commission and the ECOWAS national office at the Nigerian Ministry of Foreign Affairs. The departments and the Office of the Vice-Chair are all administrative units under the ECOWAS Commission, one of the three governing bodies of ECOWAS, which also consists of the ECOWAS Parliament and the ECOWAS Community Court of Justice. The rationale for focusing on the Commission was that this body is responsible for the everyday functioning of the regional community and thus holds the mandate to develop and institutionalise citizenship policies and practices (Ukaigwe 2016).

In researching both the ECOWAS and ASEAN citizenship regimes, I identified what I assumed were the relevant departments and institutions prior to field research, according to their official roles and mandates. Thus, I first established contact with persons at those specific departments, which in the case of ECOWAS were the Department of Trade, Custom and Free Movement, the Department of Infrastructure, and the Department of Political Affairs Peace and Security; in the case of ASEAN, they were the ASEAN Intergovernmental Commission on Human Rights (AICHR), the ASEAN Human Rights Division, and the ASEAN Commission on Women and Children (ACWC). Thereafter, interviews were planned in a way that resembled the 'snowball technique' (Bleich and Pekkanen 2013). All but one interviewee allowed the interviews to be recorded. All interviewees agreed to be identified by name and position. In fact, several of the interviewees specifically requested to be mentioned by name, especially staff of the ECOWAS Commission.

The second group of interviewees represented staff from international organisations and non-governmental organisations, located in both regions and working in collaboration with or as partners to ECOWAS and ASEAN. These organisations often held critical, in-depth knowledge on citizenship rights, nationality laws, regional migration, labour mobility, or another relevant theme. In Southeast Asia, I conducted interviews with staff of the International Labour Organisation (ILO), the United Nations High Commissioner for Refugees (UNHCR), the United Nations Development Programme (UNDP), the International Organisation for Migration (IOM), the Asia Foundation, the

ISEAS-Yusof Ishak Institute, the ASEAN Think Centre, the civil society organisation Sangsan Anakot Yawachon, and the Statelessness Network Asia Pacific (SNAP). I conducted interviews with staff from these organisations in West Africa, too, but also interviewed employees of the International Centre for Migration Policy Development (ICMPD) and the EU-Delegation to Nigeria and ECOWAS.

Lastly, between September 2018 and August 2019 I lived in Yangon, Myanmar, from where I travelled to the various ASEAN countries for interviews. During this period, and the three months I spent in Abuja, Nigeria, between October and December 2019, I participated in several gatherings, events, and conferences organised by the regional organisations and affiliated bodies. Participating in these events served a similar function as the interviews conducted in both regional contexts and provided information useful for comparing the two regional citizenship regimes and for gaining a more nuanced perception of the organisations' citizenship regime policies. Although participating in such events also helped further my knowledge on citizenship in ECOWAS and ASEAN, the informality of such gatherings and the question of ethical research conduct and consent means that these conversations and information are not quoted nor referred to directly in the *Kappa* and the articles.

Data analysis and operationalisation

In the previous sections, I outlined the two research methods I used for gathering the empirical data for conducting the comparative case study of the ECOWAS and ASEAN citizenship regimes. In this section, I will outline *how* I gathered the empirical data, *how* I went about analysing it, and reflect on *what* I was looking for during field research in order to examine and compare the two regional citizenship regimes. In other words, in this section I explain how I operationalised the four conceptual legs of the framework – rights and duties, access to political participation, belonging and identity, and the responsibility mix – to study the concepts. In chapter 3, I outlined the analytical framework and described these four dimensions. This section builds on the conceptual explorations of the four dimensions and provides the reader with insight into how I used the four concepts as a means for analysing the regional citizenship regimes of ECOWAS and ASEAN.

In the Introduction chapter*,* I provided a discussion of my research approach and a brief overview of how I thought about ontology and epistemology when conducting the qualitative, comparative case study of this thesis. Hence, the questions of 'worldviews' and 'how we know what we know' were discussed in the introduction, where I also explained my

constructivist research approach. This comparative case study focuses on exploring how two regional citizenship regimes have been defined, developed, and institutionalised in the two different socio-political contexts of ECOWAS and ASEAN. The data analysis of the empirical material from the semi-structured interviews and the written sources provided an empirically grounded understanding and reading of the meaning of citizenship in the two regional contexts. This data analysis took place in several steps.

First, before the field research in Southeast Asia and West Africa, I familiarised myself with the current theoretical and conceptual debates on citizenship in regional organisations, a debate I also outlined in chapter 3. Before gathering the empirical data, I defined the conceptual framework which guided the study throughout the field research. This framework had previously been used to study similar cases of citizenship development in the EU (Jenson 2007) and the UN (Auvachez 2009). I then deductively identified and formulated themes to explore during the semi-structured interviews and when reading through the written materials. Although the framework and themes used for organising the study were thereby created deductively, the interpretations and discussions of the data were empirically informed. The approach to collecting the empirical data was thus interpretive in character as this approach assumes that social observations are interpreted through the perception of the participants and interviewees of a study, embedded in the specific historical context (Blanche et al. 2006).

Although the deductively established framework and themes guided the data collection process, the interpretative approach I took during field research allowed me to view the research subject, the regional citizenship regimes, from the interviewees' perspectives and interpret their perceptions in order to obtain an in-depth understanding of the two regimes (Blanche et al. 2006). Moreover, the use of the same four-dimensional framework throughout field research allowed me to stay true to the comparative case study approach and its horizontal axis, which 'encourages comparison of how similar policies and practices unfold across sites at roughly the same level' (Bartlett and Vavrus 2020).

Second, after the field research period and the collection of empirical data through interviews and document analysis, I transcribed the interviews and grouped the responses together according to the four thematic dimensions of the framework. I followed a similar procedure with the written material throughout the work on this study. I did not use coding software for the data analysis, but instead manually coded and categorised the data. In practice, I combined and contrasted the explanations, definitions, opinions, and statements of the interviewees with the institutional documents to let the

empirical material define thematic groups; I then contrasted those with the predefined four dimensions of the framework. This approach allowed me to organise the data in a way that aided its analysis and simultaneously left room for the data to alter and develop the framework.

In this way, findings from individual interviews could shape my theoretical and conceptual exploration of the regional citizenship regimes. For instance, the emphasis on physical access to participation made by an ECOWAS Commission officer challenged the common conceptualisation of the access dimension of a citizenship regime, which usually divides access into direct and indirect. Such 'challenges' were fascinating to me and shaped the analysis I present in this thesis. Furthermore, my interpretative approach to data analysis was not aimed at creating objective meaning from the data but at teasing out understandings rooted in specific contexts and historical situations (Blanche et al. 2006). Thus, this approach helped me analyse regional citizenship regimes from the regional actors' perspectives and made it possible to pay particular attention to the historical contexts, and to remain open to the information provided in written sources and interviews.

In the thesis, the concept of regional citizenship regime entails four constitutive dimensions: rights and duties, access to political participation, belonging and identity, and a responsibility mix. Thus, I understand regional citizenship regimes as membership regimes based on these four aspects. This differentiation made it easier to investigate the regional citizenship regimes – their development, formation, and institutionalisation – in the two contexts. To explore the ECOWAS and ASEAN citizenship regimes, I approached the interviews and the analysis of the written material in three steps. First, I formulated questions targeting the interviewees' understanding of citizenship in general, and of citizenship policies in the organisation in particular, thus establishing an understanding of how citizenship is perceived in the two organisations and how these might vary. Second, I asked questions regarding the framing, understanding, and institutionalisation of each of the four dimensions.

Third, to better study the regimes, it was not enough to identify the four dimensions in the organisations' written materials or to ask about these more abstract or fluid terms during the interviews. Instead, I adopted what I called the 'synonym technique' to identify the four dimensions of a citizenship regime in the written material and discuss these aspects with the interviewees. This technique developed quite naturally as a communication and data gathering technique between me, the interviewees, and the written material. Thus, the use of synonyms was open and transparent. Officials provided information about the synonyms they used for citizenship so that we could

better discuss the dimensions I had identified in the framework. Bearing in mind the challenges posed by the potential methodological dilemma of *how I know citizenship when I see it*, the use of the 'synonym technique' helped operationalise the abstract concepts deductively derived from theory into categories I could discuss with the interviewees and which made sense in their institutional framework and socio-political contexts. That being said, the subsequent interpretations of the regional citizenship regimes are my own. The use of the synonyms and concepts by the organisations' officials merely allowed me to discuss the four dimensions separately, and as part of the concept of citizenship, with interviewees who commonly refrained from using the conceptual framing I used for my study. The most commonly used concepts and synonyms of my framework dimensions were:

The ASEAN citizenship regime and the predominant synonyms

Rights and duties */ human rights / security / labour migration / responsibilities / community obligations / four freedoms / movement*

Access to political participation */ community engagement / civil society / political activity / participating in the community / non-governmental organisations / travel card / open sky*

Belonging and identity */ (ASEAN) identity / connectivity / community feeling / solidarity / cohesion / Asian values*

The responsibility mix */ collaboration / civil society / national governments / AICHR / ASEAN institutions / regional, national, local departments / actors / stakeholders*

The ECOWAS citizenship regime and the predominant synonyms

Rights and duties */ human rights / regional movement / social security / legal protection / responsibilities / voting / universal rights*

Access to political participation */ civil society / political engagement / non-governmental organisations / free movement / border posts / voting / infrastructure*

Belonging and identity */ ECOWAS identity / West African identity / community / social cohesion / legal recognition / passport / ID card / ethnicity*

The responsibility mix */ regional collaboration / the ECOWAS court / the parliament / civil society / national governments / ECOWAS commission / departments*

The objective of the thesis is not to measure the institutional level of citizenship regimes, nor the 'strength' or legality of the individual dimensions of the regimes. Instead, using the 'synonym technique', I asked questions which allowed me to identify the different aspects of the citizenship regimes and to unpack the following four dimensions: the types of rights and duties allocated to the regional citizens; the possibility of accessing the political community and participating politically; the notion of regional belonging and identity; the citizenship responsibilities of different institutions, actors, and stakeholders in the communities. Adopting the context-specific vocabulary of the organisations and the officials helped me identify and interpret the types of rights granted to regional citizens. In order to operationalise rights and duties, I drew on previous work by Marshall (1950), Janoski and Gran (2002), and others (Jenson 2007; Wiener 1998) and identified legal, civil, political, social, and cultural rights and corresponding duties by using the technique described above for identifying these types of rights and duties and for discussing them with the interviewees in the specific socio-political contexts.

In this thesis, access refers to the possibility of accessing political participation, and it commonly denotes active engagement in a political community. I analysed this dimension by investigating the institutional mechanisms that provide access to the community and exploring the legal and practice-based modes of participation (Jenson 2007). The dimension of access tells us about how citizenship is practised in the regime, whether it takes on a legal or an informal character, how people can access participation in the community, and thereby how open and inclusive the citizenship regime is.

When investigating the notion of belonging and identity, Michael Wintle (2005b) reminds us that 'identity construction is a political process', and when researching notions of identity 'it is always necessary to ask who is promoting which particular collective identity and why, and who is resisting it'. The type of belonging examined in this thesis is an institutionalised and 'top-down' constructed belonging by regional organisations rather than individual, regional citizens. Thus, this thesis treats regional organisations as political communities capable of constructing, and imposing, a particular, institutional type of belonging, which differs from the more fluid concept of regional belonging developed 'from below' by people themselves. The institutional type of belonging was explored by investigating 'the narrow passport-holding sense of identity, which recognises people as regional citizens, and the more complicated and practice-based type of belonging that is constructed through networks and social exchanges (Jenson 2007).

I examined the ECOWAS and ASEAN citizenship regimes' responsibility mixes by investigating which institutional actors hold citizenship-

responsibilities in the regional communities. Moreover, the emergence and development of different actors and institutions sheds light on how citizenship regimes are regulated and how actors play important roles in constructing and institutionalising them. The responsibility mix is an important dimension of citizenship regimes because it shows how the regimes are constructed and understood, whether they are legal or non-legal, constitutional, or practice-based, and how norms, rules, and regulations are shaped, and by which institutions they are shaped.

Reliability and validity

During the process of collecting and analysing the empirical data, I was faced with challenges inherently linked to the relationship between the research objectives, the research methods deployed, and the reliability and validity of the data. According to Margaret LeCompte and Judith Goetz (1982, 32), 'reliability is concerned with the replicability of scientific findings' whereas 'validity is concerned with the accuracy of scientific findings'. Reliability thus refers to the extent to which another researcher who applies the same research methods can obtain similar results or findings. This is understandably difficult, especially in qualitative research, where the practicalities of the research methods, the positionality of the researcher, and different, often implicit or invisible, power-dynamics impact the research outcome. Often-heard criticisms of qualitative research, and comparative studies in particular, focus on reliability and validity (Simmons and Smith 2019; Quintão et al. 2020). In the following section, I outline how I have considered such potential issues of reliability, internal validity, and external validity.

To address challenges to reliability and to produce the most reliable study, Robert Yin (2014) proposes that each research step should be operationalised to minimise biases. In this study, I have tried to enhance reliability by transparently discussing all the research steps taken for this comparative case study. I discuss how I arrived at the theoretically informed analytical framework and how I operationalised the four dimensions of the comparative case study. Moreover, I sought to increase reliability by standardising the interview guidelines I used for gathering the empirical material during both field research stays. I also openly discussed and explained the objectives of the study with the interviewees to ensure that they understood the research project. Lastly, I have meticulously archived the interview guide and the data obtained from the interviews and document analysis for possible future reference.

Despite my objective of keeping the study open and transparent, two factors potentially impacted the reliability of my findings negatively. These factors relate to the challenges I faced concerning access and the governance

structures of ECOWAS and ASEAN. Although I maintained an open and transparent approach during the field research stays, gaining access to the necessary departments and institutions of ECOWAS and ASEAN proved to be challenging at times, especially in the case of ASEAN, which means that replicating this study would likely be difficult for another research due to access constraints. In the last section of this chapter, I discuss this particular challenge.

I always cross-referenced findings carefully, for example by interviewing different officers from the same department and probing them on similar questions. Moreover, the statements made by the officials from ECOWAS and ASEAN were always contextualised by the written material in order to provide a more 'correct' and holistic perspective on the different aspects of the two regional citizenship regimes, respectively. Another factor that influences the value of research relates to validity. According to LeCompte and Goetz (1982, 32), 'establishing validity requires determining the extent to which conclusions effectively represent empirical reality and assessing whether constructs devised by researchers represent or measure the categories of human experience that occur'. In other words, validity refers to whether the findings genuinely represent what is being researched. Validity is commonly divided into *internal* and *external* validity. Internal validity refers to whether the research results have, in fact, addressed the research questions, and if so, that the findings speak to the phenomenon the researcher set out to study (Mason 1996). External validity, on the other hand, refers to the extent to which the result of a study can be generalised beyond the specific research context (Bryman 2012).

Although the comparative case study methodology is arguably the most appropriate design for this thesis, I acknowledge that the design has some potential weaknesses. For instance, researcher bias might creep into the comparative case study and negatively influence the result of the study (Yin 2014). To some extent, bias is unavoidable. However, the use of different sources and research methods limits potential bias and enabled me to approach the comparative case study from different viewpoints. The use of multiple sources to approach the same phenomenon is also known as data triangulation (Bryman 2012). In the study, I drew on multiple sources of evidence. For instance, although the interviews conducted with officers at ECOWAS and ASEAN hold great importance for the thesis, I conducted a number of interviews with partner organisations, civil society organisations, and non-governmental organisations, which provided critical insights into the citizenship formation in the two organisations and often challenged the rather positive rhetoric expressed by the officers at ECOWAS and ASEAN. This

approach helped me gain a nuanced, informed, and holistic overview of what was being researched and ultimately made it possible for me to compare the two cases and draw informed conclusions.

While I sought to strengthen the internal validity of this study through the use of multiple sources and methods, I also considered the dimension of external validity. External validity exists if the findings of a study are generalisable. John Gerring (2007, 248) argued that 'to be a case of something broader than itself, the chosen case must be similar (in some respects) to a larger population. Otherwise – if it is purely idiosyncratic (unique) – it is uninformative about anything lying outside the borders of the case itself'. In other words, good representativeness of a case or cases studied is essential for a good degree of external validity.

I believe that my findings speak to a broader universe of cases and that they can help us understand regional citizenship regimes beyond ASEAN and ECOWAS. In particular, the findings from the South-South comparison presented in this thesis speak to cases of regional citizenship regimes that first, are informal and/or second, exist in regions that are marked by lower levels of economic development than those found in the global North. For instance, we can suspect that the emphasis on having physical access and providing accessibility to rights of movement might be equally important in other regional citizenship regimes in regions where infrastructure development and the facilitation of movement between countries in the region remains challenging. This might include citizenship regimes in certain parts of Latin America and in Africa. We might, for example, expect that the nascent citizenship regime of the East African Community (Obi 2012) emphasises the importance of combining rights with access to give them meaning in a way that is similar to ECOWAS. Similarly, we can expect that at least some of the dynamics governing ASEAN regional citizenship will be present in other cases that also refrain from legally defining regional citizenship.

While I have so far not been able to test these hypotheses,[22] the thesis is not merely a piece of analysis that speaks to two cases and explores how they vary. Rather, it opens up new avenues for future research and will hopefully inform debates about our general understanding of regional citizenship regimes. Indeed, some of the ideas presented in this thesis – for example the notion that citizenship regimes are not defined by their extent of formalisation – might very well inform new debates on the matter. Consequently, the arguments and findings of this thesis are relevant to broader debates within citizenship studies.

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[22] For more details on the limitations of this thesis see chapter 1, and for a discussion on directions for future research see chapter 5.

Ethical considerations and positionality

Ethical considerations were important for me during the design period of this study. I began my doctoral studies by familiarising myself with the guidelines on research conduct, ethical guidelines, and the 'do no harm' research procedures for conducting qualitative studies (Vetenskapsrådet 2018; Hopf 2004). These considerations continued to inform my qualitative fieldwork. Prior to conducting interviews, I informed all interviewees about the research objectives, the questionnaire and the interview guidelines, their role and position within the study, why they were asked to participate, the subsequent publications, issues of data protection, and how I was handling their information. All interviewees were asked about consent and all except one gave permission to record the interviews, and they all informed me about their specific wishes regarding anonymity and quotations for future publications. Based on their consent agreements and their individual anonymity wishes, names and titles have been included in the articles in cases where the interviewees wished for this or allowed me to specify their positions in the organisations. In fact, I did not encounter any issues over consent and often experienced a willingness by the interviewees to be identified and for their opinions and perceptions to be publicised.

After conducting the interviews, and having transcribed the conversations, the interviewees were informed by email about the possibility of receiving the transcription and the possibility of withdrawing or changing their consent. I also offered them the opportunity to comment on the text. However, none of the interviewees made use of this option. Regarding data security and storage, the interview transcriptions, the original recordings, including verbal consent and other personal information, were stored on an external hard drive at my home department. Thus, procedural ethics, a term referring to the ethical considerations on the more technical aspects of a study, did not present major challenges for me. However, practical ethical issues did materialise around the relationship between researcher and respondents, pre-established norms and practices in the field research setting, and my positionality as a researcher. I reflect on these challenges in the next sections.

Interviewing 'elites' and gaining access

Keeping in mind established ethical standards and 'best practices' during field research (Vetenskapsrådet 2018), I tried to adhere to the same interview standards and ethical guidelines during all interviews I conducted with officers of ECOWAS and ASEAN, their affiliated institutions, and with the employees of international and non-governmental organisations. Some of the interviewees held high and influential positions within their organisations. Thus, although a

contested term, these persons could be labelled as 'elites', as they can be 'loosely defined as those with close proximity to power' (Lilleker 2003, 207). As pointed out by Zoë Morris (2004), this definition includes corporate, political, and professional 'elites'.

Characterising a person as an 'elite' is a relational exercise, meaning that researchers tend to characterise interviewees as 'elites' due to their social position compared to the researcher or the average person within the society (Stephens 2007). That being said, I agree with Katherine Smith's critique (2006), that such a label is not necessarily helpful, nor does it provide much value to the interview situation and research at large. Although some scholars would perhaps agree with Kim England's statement that 'interviewing elites does raise different sorts of issues than for researchers studying less powerful groups' (2002, 200), I found that this statement did not necessarily capture the dynamics of the interview situations and the relation between me and the interviewees. Her statement rests on the perception that 'elites' hold some sort of power over the person conducting the interview; however, this power-dynamic played out quite differently during a majority of the interview situations that I was in, both in Southeast Asia and in West Africa. Therefore, in this thesis, I refrain from using the term 'elites' when referring to the interviewees I met with at ECOWAS and ASEAN, and instead use the less contested terms officials, officers, or staffs.

Power-dynamics and hierarchy played out in different ways during my field research in Southeast Asia and West Africa. For instance, during several interviews at the ECOWAS Commission, I was expecting to meet officials who would inform me about their work and the citizenship policies, and who would provide convincing arguments illuminating the specific themes of their departments. I expected to be met with assertiveness, but my interview experiences, instead, supported the Smith's argument (2006) that persons seen as 'elites' do not necessarily exert power associated with their positions during interviews. I, thus, faced no substantial issues arising from hierarchies and the status of many of the interviewees.

During field research, I was met with challenges which can best be described as problems of gaining access (Glas 2021). These challenges played out in two different ways: first, I experienced logistical issues concerning physical access and travel in both regions. Due to the decentred nature of ASEAN, I had to travel extensively throughout Southeast Asia between November 2018 and February 2019, which was time consuming. Time constraints and limited funds prevented me from travelling to all ASEAN countries for interviews. For my research on the ECOWAS citizenship regime, I had initially planned to conduct interviews in Nigeria, as well as in Dakar,

Senegal, and Ouagadougou, Burkina Faso, due to the location of relevant ECOWAS institutions. However, visa requirements and finances put a stop to these travel plans, and the fact that most ECOWAS officers were based at the headquarter in Abuja informed my decision to focus my energy and resources on a field research stay in Abuja.

Second, and more challenging, were the issues around gaining physical access to interviewees and getting responses from the officers at ECOWAS and ASEAN. It took over a month before I was able to schedule my first meeting in Southeast Asia, following over 100 emails and dozens of phone calls. At first, I experienced a general unwillingness or unavailability from the officers at ASEAN. Thus, I had to change my strategy. I met with an acquaintance who helped plan the first meeting with an ASEAN officer at the Human Rights Division. This first interview allowed me to subsequently 'snowball', seeking and securing new interview leads from contacts established through already held interviews.

Having learned from the challenges of gaining access in Southeast Asia, I began reaching out to officers at ECOWAS several months before I arrived in Abuja. Moreover, through a personal contact at the Heinrich Böll Foundation, the political foundation of the German Green Party, I was introduced to the Heinrich Böll Foundation's country office in Nigeria, which provided me with contact information for several of the interviewees at the ECOWAS Commission. Thereafter, I applied the same interview planning technique I had used during field research in Southeast Asia. Although use of the 'snowball technique' provided me the necessary access to the organisations and its officers, this method also had drawbacks. The 'snowball technique' can potentially result in the researcher being 'trapped' in a network of likeminded interviewees, as the person facilitating access may be prone to establish contacts with persons holding the same or similar views (Bleich and Pekkanen 2013).

That said, I tried to counter this kind of bias in two ways: first, having established contact with officers at ECOWAS and ASEAN, I also gained access to the cafés and libraries of the ECOWAS Commission and the ASEAN Secretariat, and working from those locations I established further contacts informally. Second, I always confronted the statements made during interviews with the extensive written materials of both organisations to safeguard against any misrepresentation of factual events.

Positionality
Positionality refers to the relationship between the researcher and the interviewee, both in terms of pre-established expectations and the dynamics

during the actual interview situation (Glas 2021). Thus, how the researcher and interviewees interact is dependent on internal and external factors such as hierarchy, gender, age, class, etc. (Smith 2006), all of which can be consequential for the research outcome (Glas 2021). While conducting interviews, and generally when navigating field research in West Africa and Southeast Asia, challenges of positionality played out in two ways that illustrated a major difference between conducting interviews with officers from ECOWAS and ASEAN. In both contexts, because I was a researcher from an EU country, most of the interviewees saw me as representing the EU itself, or as someone with a European research lens, trying to compare their organisation to those within the EU. This happened countless times, despite the detailed explanations I provided of my role at the University of Gothenburg.

These perceptions about me influenced the interviews in different ways. In the majority of interviews conducted at the ASEAN Secretariat or with affiliated institutions, the officers had a rather defensive tone when explaining the institutional policies and practices and discussing citizenship and citizenship-related initiatives. In interviews with officers at the ECOWAS Commission, the interviewees did often contrast their opinions and answers with their knowledge of the EU but did so in a more curious way. These dynamics meant that situations often occurred wherein answers were provided to please me as a researcher rather than challenging the ways I had framed a question. It also meant that the interviews in Southeast Asia were often quite tense whereas those in West Africa were more straightforward and relaxed. With practice, I became better at navigating these pre-established ideas about me and my study. As previously discussed, my use of synonyms and alternative labels during interviews allowed me to mirror the vocabulary of the respective institution, which was one strategy to counter these pre-established ideas.

Another important aspect of my positionality as a doctoral researcher has to do with the interpretations I made of the gathered material. This 'interpretive paradigm' does, according to Nomazulu Ngozwana (2018, 20), 'recognise that truth is subjective because the researcher is part of the world under review, and its organisations and institutions are viewed as a constructed social reality'. This thesis does not ask what regional citizenship regimes *are* but rather how this concept can be *understood*; it thus investigates institutional understandings by interpreting the subjective meanings emphasised during the interviews, in combination with the content of written materials. Thereby, the thesis assumes that reality is an interactive, shared social experience subject to interpretation, and that positionality plays an important role for the interpretation.

5
Conclusion

Citizenship is not a fixed concept. Rather, it is defined by its mutability (Wiener 1998). Citizenship practices adapt to global developments, migration streams, the re-drawing of borders, the reconfiguration of nation-states, increasing globalisation, altered states of belonging, and to the increasing role of regional organisations (Cabrera and Byrne 2021; Obi 2012). The way regional organisations imagine and shape citizenship regimes and practices outside the global North is the focus of this thesis. This focus emerged in response to knowledge-gaps in the academic literature, which has focused predominantly on the EU citizenship regime when theorising regional citizenship. The attention to the EU is understandable considering the history, significance, and the extent of legalisation of the EU citizenship regime (Jenson 2007; Meehan 1993; Wiener 1998). Yet increasingly, over the past 50 years, many different regional organisations have developed and regulated notions of regional memberships. Doing so, they have constructed a variety of regional citizenship regimes based on formal and informal citizenship policies and practices. The academic literature has to some extent reflected these developments. An evolving body of literature has sought to investigate the ways that citizenship is constructed regionally in South America (Cernadas 2013; Fornalé 2017; Giupponi 2017), Africa (Ukaigwe 2016; Obi 2012; Mengisteab and Bereketeab 2012; Bappah 2013), the Gulf region (Kinninmont 2013), and Asia (Cabrera and Byrne 2021; Hirata 2015).

Yet, such academic accounts are still relatively few in number. More importantly, there has been little attention to citizenship regimes in Asia due to their lack of formalisation. For many scholars investigating citizenship regimes in the global South, the EU citizenship regime has remained the comparative case of choice (Strumia 2017; Neuvonen 2019). My research design, thus, engages with significant knowledge-gaps in the literature on regional citizenship regimes in two main ways: first, it advances a South-South comparison and deliberately avoids contrasting citizenship regimes in the global South with the EU citizenship regime. Second, it presents a comparative

study of one legal citizenship regime (ECOWAS) and one non-legal citizenship regime (ASEAN). My reasoning for pursuing this design was twofold: first, to discover whether our understanding of citizenship more broadly would change due to the novel comparative set-up; second, to analyse whether a comparison between two seemingly different cases would yield any significant similarities. The thought that steered the latter point, especially, was the notion that any similarities that the study might uncover between a formal and an informal citizenship regime would produce new revelations about the nature of informal citizenship regimes and their impact on citizens in their region.

I believe that the use of the comparative case study approach provided me with a unique way to address the research questions I had set out to investigate. With this compilation thesis, I wanted to contribute to our understanding of *how citizenship regimes constructed by regional organisations vary*; advance our knowledge of *how regional actors interpret the notion of regional citizenship*; and provide new insights into *the broader theoretical and conceptual implications resulting from the variation in regional citizenship regimes and the diverse interpretations of citizenship among regional actors*. To illustrate the main findings of this thesis, it is useful to revisit each research question and to assess how I answered these questions in each of my articles.

Variation in regional citizenship regimes

The first question I sought to explore was *how citizenship regimes constructed by regional organisations vary*. This question was inspired by the knowledge that regional citizenship regimes are neither fixed nor static. They, like other socially constructed phenomena, change and develop over time (Wiener 1998; Tilly 2005). Consequently, we can expect a high degree of variation in citizenship regimes that have emerged in different contexts and from distinct socio-political developments, a variation that is not sufficiently accounted for in the current literature. This question was important because it allowed me to provide an overview of the various types of regional citizenship regimes advanced by regional organisations around the world. I introduced this overview in article 1, *Varieties of citizenship in regional organisations: A cross-regional comparison of rights, access, and belonging*. In the article, I examined the different citizenship and citizenship-related policies of the Economic Community of West African States (ECOWAS), the European Union (EU), the Gulf Cooperation Council (GCC), the Common Market of the South (Mercosur), the Association of Southeast Asian Nations (ASEAN), the Andean Community (CAN), the Caribbean Community (CARICOM), and the East African Community (EAC).

The comparison showed that we can differentiate between two major types of regional citizenship regimes: those that can be characterised as constitutional and those that can be characterised as practice-based. In the article, I organised the eight regional organisations into two groups. In the first group, the regional organisations provided legally defined citizenship through their institutional framework. Thus, in this instance, regional citizenship is a membership status that legally recognises citizens. In the second group, citizenship is not defined legally. Rather, citizenship is institutionalised through citizenship-related policies and practices. In this case, being a regional citizen does not grant legal recognition, but it does grant access to certain citizenship rights and opportunities that are often defined within individual protocols.

Articles 2 and article 3 present single case studies of the legal ECOWAS citizenship regime and the non-legal ASEAN citizenship regimes. Thus, they are in-depth studies of the two cases which I compare and contrast in this thesis. In article 4, *The ECOWAS and ASEAN citizenship regimes: comparing regional forms of membership*, I explored the variation between the two citizenship regimes in depth by taking a closer look at the cases of ECOWAS and ASEAN together. ECOWAS formulated a legal citizenship regime, whereas ASEAN's non-legal citizenship regime is practice-based and informal. Moreover, while ECOWAS is an established and continually developing citizenship regime, ASEAN is an emerging citizenship regime. The cases were, thus, characterised by different degrees of institutionalisation and legality. Consequently, and as expected, their differences emerged along the lines I have mapped out in article 1.

Nevertheless, the comparison also uncovered unexpected similarities. The citizenship regimes were formed and developed as institutional concepts in a top-down fashion. However, despite the stark difference in the extent of legalisation of the citizenship regimes, both organisations shared certain ambitions. For example, both sought to facilitate a more active role for regional citizens and organisations in the development and formation of the citizenship regime, i.e., to increase civil-society participation. These similarities underscore one central argument I make in this thesis: when exploring citizenship regimes, we should not dismiss possible cases on the basis of their level of legalisation. Alongside their differences, the citizenship regimes of ASEAN and ECOWAS also showed similarities that highlight shared challenges and ambitions. While different citizenship regimes might be characterised by different levels of institutionalisation and formalisation, they are still comparable to one another.

It also became evident that the link between national and regional citizenship varies between regional organisations and that there are differences in the ways in which regional organisations provide access to regional citizenship. Most importantly, the comparison highlighted the different pathways to regional citizenship and established a notion that I continued to explore in the subsequent articles, namely, that some regional citizenship regimes develop through formal and informal practices and non-binding agreements rather than through law and legal practices. Yet importantly, national citizenship and regional citizenship do not compete with one another.

Regional actors' interpretations of regional citizenship

Variation in the concept of citizenship remained a theme in the second research question I explored: *how do regional actors interpret the notion of regional citizenship?* Exploring this question made it possible to gain a more detailed understanding of the conceptual variations between the two regional organisations' perceptions of regional citizenship and between the regional actors of ECOWAS and ASEAN. Moreover, and together with the first research question, understanding the diverse institutional perceptions of regional citizenship by the regional actors allowed for an analysis of the theoretical implications these perceptions have on the broader understanding of the concept of regional citizenship regimes. I explored the second research question in detail in article 2, *The emerging regional citizenship regime of the Association of Southeast Asian Nations*, and in article 3, *Regional citizenship regimes from within: unpacking the divergent perceptions of the ECOWAS citizenship regime*.

In general, the data from my empirical exploration showed that ASEAN and ECOWAS officials tend to understand citizenship through the defining characteristics of their respective citizenship regimes, that is, through a formal lens that emphasises citizenship as a contract (especially prominent in ECOWAS) and an informal lens that emphasises citizenship as practice (especially prominent in ASEAN). For article 2, I asked ASEAN officials about their understanding of citizenship and about the link between national and regional citizenship in the region. For most of them, citizenship was not about having rights but implied a community feeling and a bond among people in the region. Especially important were the notions of community responsibilities and a shared identity as tools to foster a sense of membership among the people of ASEAN countries.

For article 3, I interviewed ECOWAS officials from a wide range of departments in order to unpack their understanding and perceptions of regional citizenship. In contrast to ASEAN officials, they often emphasised citizenship as providing for certain rights. At the same time, bureaucrats from both these regional organisations also underscored the importance of the dimension of citizenship that was less prominent or even lacking in their respective citizenship regime. While some ECOWAS officials highlighted the importance of legal rights and recognition, others argued that ECOWAS' strong focus on legalisation had led the organisation to dedicate less attention and fewer resources to the practices of citizenship, a dimension they deemed to be vitally important. Importantly, they also argued that rights alone are not a sufficient basis for a regional citizenship regime as rights are meaningless without access to them. Those that made this point noted that a community feeling is vital for peace and security, which in turn increase access to rights. Thus, they argued, other dimensions need to be secured before rights are accessed and before they can be sufficiently claimed.

In a similar vein, ASEAN officials made the case for the importance of citizenship practices that foster identity bonds, but also argued that ASEAN's exclusive focus on this dimension prevented the regional organisation from providing greater rights and, thus, curtailed its ability and relevance. These statements illustrate that the type of citizenship regime influences the way regional actors interpret citizenship, but it does not entirely determine it. Rather, these officials' own multi-dimensional interpretations of citizenship led them to call for changes to their respective citizenship regimes. It is questionable whether this will have a significant effect in the case of ASEAN due to the limited power of the regional organisation, but it will likely change the ECOWAS citizenship regime in the future due to the role officials play in developing the organisation's citizenship regime, as I outlined in article 3.

Moreover, there is variation not only in the way different regional organisations interpret and define citizenship regimes but also in how regional actors within each organisation interpret citizenship. Although the officials I interviewed were representatives of their respective regional organisations, their views at times differed from the regional organisation's official interpretation of citizenship as outlined in official protocols and agreements. This underscores a long-established, but at times overlooked, trait of institutions: they are not monolithic. Predictably, this dynamic was more pronounced in ECOWAS due to the organisation's higher degree of institutionalisation. The various departments of the ECOWAS Commission had different understandings of citizenship and differed significantly in the

aspects of citizenship they deemed most important, a dynamic I analysed in detail in article 3.

Regional actors' diverse interpretations of regional citizenship, and the ways in which they emphasised each of its four dimensions, also played out in another interesting way. Often, when we think about access to rights, we also think about access to voting. However, regional organisation officials in the global South emphasised the importance of physical access to the region and the physical places that might grant access to rights. As I have shown in my analysis of interpretations of citizenship in ECOWAS, in article 3, there is a strong sentiment that rights are meaningless without the ability to access them. Good infrastructure, an efficient bureaucracy, and established procedures for crossing borders all increase the access to rights and, thus, the quality of the citizenship regime. Thus, the level of development within a region also plays an important role in how citizenship is interpreted and how it is given meaning. In the EU, matters of physical access (for instance to polling stations or being able to cross national borders) are now largely taken for granted, and thus access may not refer to having physical access, although this aspect was repeatedly emphasised by ECOWAS officials.

Another key finding of this comparative case study is that variation between the regimes is evident in how regional actors understand the dimension of belonging and identity, as I discussed in article 4. In ECOWAS, identity is legalised by having a regional passport or ID card. However, officials highlighted that already existing West African bonds and senses of belonging are a pre-existing basis for the promotion of ECOWAS identity and the formation of this regional citizenship regime. In contrast, in ASEAN people are not legally recognized as ASEAN citizens. There are specific ways the organisation recognises whether you are an ASEAN citizen or not. For instance, there are ASEAN lanes in airports and different visa rules for ASEAN citizens travelling intra-regionally, but there is no ASEAN passport or ID card that could provide legal recognition. Therefore, and maybe because of this 'limitation' or non-legality, the organisation first and foremost tries to create a sense of belonging and social cohesion before a potential introduction of legal recognition.

Theoretical and conceptual implications

At the beginning of this thesis, I outlined how current theoretical and conceptual understandings of regional citizenship regimes have primarily been derived from the well-researched case of the EU citizenship regime. I then identified two intertwined knowledge-gaps that this thesis seeks to engage: the limited number of empirical studies of regional citizenship regimes other than

the EU and the limited attention given to informal and non-legal aspects of regional citizenship regimes. In the previous two sections, I explored how this thesis advances our understanding of regional citizenship regimes empirically by comparatively exploring the legal and developing ECOWAS citizenship regime and the emerging and informal ASEAN citizenship regime. The third research question draws on the first two questions by asking, *what are the broader theoretical and conceptual implications resulting from the variation of regional citizenship regimes and the diverse interpretations of citizenship among regional actors?*

The findings of this thesis, thus, help further the theoretical and conceptual understandings of the concept of regional citizenship regimes. They showcase this concept as being defined by a set of institutional arrangements and formal and informal policies. These guide and shape the choices regional organisations make about the formulation, regulation, and development of regional membership. The perception that formal and informal initiatives are equally important guiding principles in the construction of regional citizenship regimes, and their use therein, is particularly important, even when regimes are legally defined and formalised, as this thesis has shown. The findings imply that regional citizenship regimes can be theoretically understood as distinct citizenship policies, rules, and arrangements that are formal as well as informal in nature. Moreover, rights and duties, notions of accessibility, and belonging and identity shape regional citizenship, but the emphasis regional organisations place on individual dimensions is also based on underlying normative assumptions and interpretations of what it means to be a citizen.

Despite the absence of a legal status, a citizenship regime can be characterised as such. Yet, while the degree of formalisation and legalisation is not a pre-condition for the existence of a citizenship regime, it does tell us something about the premises on which the regime is founded, which can be primarily legal and formal (the expression of a more liberal theorisation); emphasise informal dimensions such as a shared sense of belonging and social cohesion (the expression of a more communitarian theorisation); or focus on active participation, which creates a bond between people in a community (the expression of a more civic republican theorisation).

In chapter 3, I outlined the main theoretical perspectives on citizenship and citizenship regimes, which informed the analytical framework. These different liberal, republican, and communitarian theories of citizenship can be characterised as primarily normative, as they describe the ideal of the 'good citizen' (Bellamy 2008). In some ways, these perspectives account for the rights, duties, and other aspects that would ideally be attributed to citizens in a community. Thus, they provided important input on how to best think about

the concept of citizenship and the relationship between people and a polity. Thus, for this study, I drew on these normative theories of citizenship to develop a framework that would allow me to investigate how regional citizenship regimes play out in real life. They were essential to unpacking the empirical reality in ECOWAS and ASEAN, and for shedding light on empirical theorisations of citizenship in the two regional contexts.

This thesis presents several important findings that advance our theoretical knowledge of regional citizenship regimes. First, the comparison between ECOWAS and ASEAN illustrates that legal and non-legal citizenship regimes at times share the same challenges and ambitions. Second, the findings highlight how the EU's status of having long been the 'only/best case in town' (Strumia 2017) has potentially narrowed our understanding of citizenship in regional organisations and consolidated a series of normative assumptions about regional citizenship regimes. This becomes apparent when considering the weight of legality in the existing literature on citizenship regimes (Jenson 2007; Kochenov 2017; Strumia 2017; Vink 2017). Legal status and rights are especially important for cases in the global South, which has a higher degree of legalised citizenship regimes, but they are by no means considered to be the most vital dimensions or even a prerequisite for the existence and development of a regional citizenship regime. This is largely the case because the political reality of regions and regional organisations in the global South differs so substantially from those in the global North, both in terms of the real-life formations of citizenship status and the normative assumptions about citizenship more broadly (Cheng 2021).

The findings of this thesis show that the dynamic relationship between the four constitutive dimensions of a regional citizenship regime – namely, rights and duties, access to political participation, belonging and identity, and the responsibility mix – are organised and emphasised differently in legal and non-legal regional citizenship regimes in West Africa and Southeast Asia. This finding does not downplay the importance of the empirical and theoretical insights from studies of the EU citizenship regime, but, rather, emphasises that regional citizenship regimes can also be conceptually and theoretically understood primarily as *regimes of belonging*. As such, they are the result of different normative assumptions about rights, duties, and identities; about individualism and collectivism; and about legality and informality. I have illustrated this dynamic in article 2, where I took a closer look at 'Asian values' and community responsibilities in ASEAN and their implications for perceptions of citizenship. I also sought to highlight the diversity of normative perspectives on citizenship and how they influence the type of regional citizenship regime formed by the organisation; I did so, specifically, by

examining the importance of African personhood, kinship ties, belonging, and social cohesion-based membership, in the case of ECOWAS (article 3).

The comparative case study shows that the context – not only of the regional organisation itself but of the region at large – matters for the way regional citizenship is understood and practiced. It also determines the importance bureaucrats give to each of the dimensions of citizenship, as shown in article 3 where a particular emphasis was given to the aspect of physical access in the region. Moreover, the resources available for building the citizenship regime, economic and otherwise, also influence its design.

Additionally, the thesis illuminates how national bonds of belonging might be superseded by ethno-religious bonds in communities in West Africa, a dynamic that was highlighted by several interviewees from the ECOWAS Commission. As such, the thesis shows that the ethno-cultural mix of a population in a region and the population's socio-political history matter for the formation of regional citizenship regimes. Consequently, building a regional (legal) identity and a sense of belonging follows a different strategy in such regions. To some officials, belonging and community-building initiatives form the core of a citizenship regime. Although the existing literature on regional citizenship regimes does give attention to both the legal sense of identity and the more fluid notion of belonging (Jenson 2007; Strumia 2017; Wiener 1998; Obi 2012; Cabrera and Byrne 2021), this thesis shows that notions of belonging may in fact be central and determining features of regional citizenship regimes. This is particularly relevant in regions where actors interpret the concept of citizenship differently from the liberal emphasis on rights and legal status that emerged based on normative debates and empirical experiences in the North.

By illuminating how regional organisations in the global South think about citizenship, and by examining the dynamics between its constitutive dimensions, this thesis has presented findings that contribute to a better, more nuanced understanding of citizenship regimes precisely because these findings differ from those that are based on extensively researched cases (Wiener 1998; Jenson 2007; Strumia 2017; Auvachez 2009). At times the findings challenge our assumptions in simple but important ways. While the EU citizenship regime is often assumed to be the ideal type of regional citizenship regime and one of the first types of regional membership, ECOWAS did, in fact, formalise a legal citizenship status a decade before the EU (ECOWAS 1982).

Yet, although the legal definition of the ECOWAS citizenship status was introduced before the EU citizenship status, it does not tell us much about the character or functionality of this status. Instead, this point illustrates that regional citizenship formation processes take place differently and separately

across regions in the world. Correspondingly, they have different degrees of what Tilly has coined 'thickness' (1996, 8). Building on Tilly's conceptualisation of citizenship, as ranging from passive to active and from thick to thin, the thesis also sheds light on the ECOWAS and ASEAN citizenship regimes and their respective 'thicknesses', understood as their robustness and in terms of how much 'weight' or importance each of the dimensions has for the regional actors developing the regimes, as I also highlight in the comparison of these regimes in article 1.

The comparative case study in article 4 and the single case studies in articles 2 and 3 also show that the differences between the conceptualisation of regional citizenship regimes in ECOWAS and ASEAN is based on several diverging theoretical assumptions about citizenship: ASEAN officials commonly expressed the (normative) assumption that the concept of citizenship defines who belongs to a community, and that the concept tells us something about shared identity and to whom citizens are responsible. Exhibiting parallels to the theorisation of citizenship as shared practices and beliefs (Habermas 1994) and the theorisation of citizenship as a cultural understanding between people based on social cohesion and coexistence, citizenship in ASEAN was primarily interpreted as having a shared sense of belonging.

In line with the design and mandate of ASEAN, officials emphasised participation and belonging, rather than rights and laws. Their interpretations were primarily based on the argument that rights could not necessarily be claimed or guaranteed even when legally defined (in local, national, and regional communities) and that they, thus, should not determine citizenship status or define the terms of inclusion/exclusion. This argument shows some parallels with the theorisation of citizenship as practice (Wiener 1998) and the perception of citizenship as a tie, defined as 'an enforceable mutual relation between an actor and state agents' (Tilly 1996, 8). Because of the emphasis on informal and non-legal aspects of citizenship in ASEAN, its regional citizenship regime cannot be theorised as a contract, because the regime in its current form is not built on the promotion of mutually enforceable claims between citizens and a governing body, a defining feature of the theorisation of citizenship as a contract (Tilly 1997). In fact, claim-making is effectively non-existent in the ASEAN citizenship regime.

The underlying normative assumptions about citizenship in the ECOWAS context differ from those that guide ASEAN. Legal status and rights were guiding principles in the formation of the ECOWAS citizenship regime. However, a range of informal and non-legal aspects emerged as guiding the understanding of what it means to be a regional citizen when I unpacked the

conceptual assumptions about citizenship with the regional actors involved, a theme I explored in article 3. Notions of kinship, community ties, a sense of belonging, ethnicity, and language shaped the conceptualisation of regional citizenship in a way that was not at first apparent from the institutional definition of ECOWAS citizenship. Thus, although the ECOWAS citizenship regime officially provides a legal status and rights, theorising the regime only in terms of liberal perceptions of citizenship is inadequate, given that the underlying conceptual assumptions are primarily derived from shared community feelings and informal criteria. As ECOWAS Commission officer stated, 'citizenship means that you belong, and from this sense of belonging we can develop rights and duties, but they only make sense for people because they already feel like a part of a community' (Interview, Émile Zida, Abuja, 6 December 2019). Moreover, other actors from ECOWAS made similar arguments. Their interpretations were characterised by the promotion of informal and non-legal features such as community-belonging, responsibilities, shared values and history, the ability to physically access and claim rights, and an emphasis on providing different, often informal, mechanisms that allow regional citizens to be active politically in both regions.

Directions for future research

The findings of this thesis open up new possibilities for future research. Such research could focus on providing more data on South-South comparisons or paying closer attention to how the socio-cultural make-up of a region's population shapes a citizenship regime. Given the emphasis officials from ECOWAS and ASEAN attributed community-building, it would also be interesting to investigate how they approach this goal in practice, which this thesis only partly examined. The possible directions for future research are also defined by aspects that I was not able to address in this thesis although I expect them to be relevant for our broader understanding of citizenship regimes and their formation.

In article 1, I mapped out how eight regional organisations have increasingly formulated citizenship and citizenship-related policies in their institutional frameworks, commonly as part of regional community-building initiatives. This mapping showed some interesting similarities and differences in the approach to constructing regional citizenship regimes across very different regional contexts. However, because I chose to focus on the specific cases of the legal and formalised ECOWAS citizenship regime and the non-legal and informal ASEAN citizenship regime in this thesis, I did not provide further in-depth studies of the remaining organisations and their citizenship initiatives. Article 1 served as a typology study of regional citizenship.

However, more recent developments of regional citizenship initiatives might add to this typology and, as such, future research could advance the overview and typology I had set out to develop.

Moreover, because I did not go into further details on how other regional organisations construct and advance regional citizenship initiatives, there is still a need for more case-based research to advance the understanding of regional citizenship regimes. In-depth research on regional citizenship regimes that have received little attention within scholarly debates, such as SADC, EAC, or the Gulf, might reveal new and vital empirical findings that would further this field of studies and add theoretical and conceptual knowledge regarding the various forms of regional membership. For instance, the case of the Gulf citizenship regime might tell us more about how regional forms of membership are constructed based on economic rights. This understanding might challenge the emphasis on regional identity formation as part of constructing a regional citizenship regime, since this dimension is not featured in the definition of the Gulf citizenship regime (Kinninmont 2013). Such research perspectives have the potential to advance our understandings of regional citizenship regimes and their roles in regional organisations' integration agendas and could build on findings presented in this thesis.

Future research should also consider more diverse notions of formal and informal forms of membership and should begin to examine these dynamics 'on the ground', including paying attention to the perspectives of the people who ultimately feel the impact of the institutional policies and initiatives – or the lack thereof. Thus, studies which attend to how people themselves understand regional citizenship, and to their perceptions and experiences of regional organisations' 'top-down' construction of regional citizenship, would provide vital insights into the benefits, limitations, practices, and implementation challenges of regional citizenship regimes. This approach would add another key perspective, one that sheds light on whether the interpretations of citizenship that regional organisations and their representatives advance travel to the population in these regions, or whether there exist diverging understandings 'on the ground'. This research focus would also shed light on the relationship between the various national citizenship regimes and the regional organisations' constructions of regional citizenship regimes, and possible overlaps, tensions, and challenges between these. In short, the relationship between the regional citizens and the polity warrants further attention.

Additionally, to advance our understanding of the ways in which regional citizenship regimes function and how regional citizenship is practised, future research would benefit from specifically focusing on the potential obstacles

and challenges to implementing regional citizenship policies nationally. This focus would speak more broadly to the ways regional organisations function in the global South and illuminate the dynamic relationship between member states and regional organisations. By comparatively exploring the legal and formalised ECOWAS citizenship regime and the informal and emerging ASEAN citizenship regime, the thesis has advanced our understanding of how regional organisations construct forms of membership beyond a nation-state, and how these forms vary. These institutional insights are vital for improving knowledge on regional citizenship regimes and for better understanding the ongoing constructions of forms of membership beyond the nation-state by regional organisations across the world, constructions which significantly influence people's lives, opportunities, and futures – negatively as well as positively.

Svensk sammanfattning

Avhandlingens svenska titel är: *Regionala medborgarskapsregimer: en jämförelse av ECOWAS och ASEAN*. Avhandlingen består av fyra forskningsartiklar och en kappa, och den undersöker förhållandet mellan medborgarskap och regionala organisationer i Västafrikanska staters ekonomiska gemenskap (ECOWAS) och Sydostasiatiska staternas förbund (ASEAN). I synnerhet studeras variationen i regionala medborgarskapsregimer, hur regionala aktörer tolkar begreppet regionalt medborgarskap och vad dessa variationer och tolkningar betyder för förståelsen av regionala medborgarskapsregimer. Avhandlingen bygger på en kvalitativ, jämförande fallstudie och på empiriska data från officiella dokument och 49 semistrukturerade intervjuer som genomförts med tjänstemän från ASEAN och ECOWAS och personal från enskilda organisationer. Med grund i tidigare forskning utvecklas ett analytiskt ramverk som möjliggör jämförelsen av en rättslig medborgarskapsregim (ECOWAS) och en icke-rättslig medborgarskapsregim (ASEAN).

Avhandlingen motiveras av den ökande utvecklingen och regleringen av medborgarskap i regionala organisationer som skapar en ny, "extra" nivå av medborgarskap utöver det nationella medborgarskapet. Eftersom den inomregionala rörligheten av personer är stor inom många regioner påverkar de nya formerna av medborgarskapsstatus miljontals människors liv. Trots deras ökande betydelse finns det lite forskning om regionala medborgarskapsregimer utanför Europeiska unionen (EU). Den stora dominansen av EU och dess betoning på rättsliga principer leder till att liten eller mycket begränsad uppmärksamhet ges till informella och juridiskt icke-bindande former av regionala medborgarskapsregimer. För att fylla dessa luckor i litteraturen belyser avhandlingen hur regionala organisationer konstruerar regionala medborgarskapsregimer och undersöker nyanserna i dessa regionala regimbildningar i ECOWAS och ASEAN. Skapandet av en regional medborgarskapsregim innebär en omstrukturering av nationellt medlemskapsstatus. Denne omstrukturering förändrar förhållandet mellan människor och en suverän nationalstat genom att dra nya medlemskapsgränser som bestäms av de regionala organisationerna.

För att uppnå dessa ambitioner besvara avhandlingen följande forskningsfrågor:

1. Hur varierar medborgarskapsregimer som konstrueras av regionala organisationer?

2. Hur tolkar regionala aktörer begreppet regionalt medborgarskap?

3. Vilka är de bredare teoretiska och begreppsliga konsekvenserna som följer av variationen av regionala medborgarskapsregimer och de olika tolkningarna av medborgarskap bland regionala aktörer?

Den första forskningsfrågan innebär en jämförande empirisk analys av olika regionala medborgarskapsregimer, med betoningen på hur dessa konstrueras av regionala organisationer och hur dessa regimer varierar. Den första forskningsfrågan fokuserar således på att beskriva de olika regionala medborgarprocesserna i ECOWAS och ASEAN och undersöka hur de har påverkat bildandet och utvecklingen av olika former av regionalt medborgarskap. Den jämförande analysen belyser skillnaderna och likheterna i regionala medborgarskapsregimer i olika sociopolitiska sammanhang för att identifiera potentiella mönster och tendenser. Resultaten kopplar till den andra forskningsfrågan, som styr en empirisk undersökning av regionala aktörers förståelse av medborgarskap och regionala medborgarskap tolkas i de specifika sociopolitiska sammanhangen. För att besvara denna fråga krävs en begreppslig diskussion om medborgarskapstolkningar på regional nivå, särskilt av regionala organisationer och de aktörer som är involverade i konstruktionen av regionala medborgarskapsregimer. Den tredje forskningsfrågan handlar slutligen om de teoretiska och konceptuella implikationerna och konsekvenserna av resultaten från den första och andra forskningsfrågan för vår förståelse av regionala medborgarskapsregimer.

De tre forskningsfrågorna besvaras i fyra separata artiklar. Artikel 1, "Olika former av medborgarskap i regionala organisationer: en tvärregional jämförelse av rättigheter, tillgång och identitet" (*Varieties of citizenship in regional organisations: a cross-regional comparison of rights, access, and belonging*), kartlägger variationen av medborgarskap i åtta regionala organisationer och genomför en jämförande undersökning av hur regionala organisationer har inrättat medborgarskap och medborgarskapsrelaterade strategier. I artikel 2, "Den framväxande regionala medborgarskapsregimen i Sydostasiatiska Nationers Förbund" (*The emerging regional citizenship regime of the Association of Southeast Asian Nations*), undersöks de institutionella initiativ som lett till uppkomsten av en informell, regional typ av medlemskap och empiriskt utforskas utvecklingen av ASEAN:s regionala

medborgarskapsregim. I artikel 3, "Regionala medborgarskapsregimer inifrån: uppackning av olika uppfattningar om ECOWAS medborgarskapsregime" (*Regional citizenship regimes from within: unpacking divergent perceptions of the ECOWAS citizenship regime*), analyseras olika institutionella uppfattningar om en regional medborgarskapsregim ur de aktörers synvinkel som är involverade i processen med att skapa själva regimen. Artikel 4, "ECOWAS och ASEAN:s medborgarskapsregimer: en jämförelse mellan regionala medlemskap" (*The ECOWAS and ASEAN citizenship regimes: comparing regional forms of membership*), innehåller en jämförande fallstudieanalys av regionala former av medlemskap genom att utforska likheter och skillnader mellan den rättsliga medborgarskapsregimen i ECOWAS och den icke-rättsliga medborgarskapsregimen i ASEAN.

Avhandlingen som helhet erbjuder tre viktiga generella slutsatser: För det första är en rättslig definition och därmed en hög grad av legalisering inte en nödvändighet för regionala medborgarskapsregimer. För det andra: Även i de fall där regionala medborgarskapsregimer kan anses som mer legaliserade anses även andra aspekter, särskilt identitet och tillhörighet, som lika viktiga av dem som konstruerar regimerna. För det tredje har nivån på den socioekonomiska utvecklingen i en region direkt inverkan på utformningen av regionala medborgarskapsregimer. Sammantaget ger denna avhandling en rad viktiga insikter som främjar vår förståelse av regionala medborgarskapsregimer genom att visa på olika kriterier för vad vi anser vara en medborgarskapsregim. Den erbjuder också en djupgående och jämförande analys av de antaganden som regionala organisationer baserar sina medborgarskapsregimer på. Därmed bidrar den till vår förståelse av hur politiska realiteter och den politiska kontexten påverkar den institutionella utformningen av medborgarskapspolitik i Västafrika och Sydostasien – vilket på ett avgörande sätt kan påverkar människors liv, möjligheter och framtid, både negativt och positivt.

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Appendix 1
General interview guide

The following interview guide was used to guide the semi-structured interviews conducted with officials working at ASEAN and ECOWAS. Moreover, it also steered the semi-structured interviews with non-governmental organisations and international organisations. In some cases, the questions were altered to reflect the specific expertise of interviewees or a specific context. The interview guide is divided into the following two thematic sections: first, understandings and constructions of citizenship, and second, the relationship between regional citizenship and regional integration.

Introduction
Introduce the doctoral study and explain why I reached out to the interviewee. Include an explanation of choices of anonymity and consent and ask for recording and quoting options.
- *What is your position, and what are your daily tasks?*
- *In what ways are you involved with:*
  ASEAN's connectivity programme/ASEAN identity-building
  ECOWAS community citizenship building
  Regional community building

Part 1. Citizenship perceptions and constructions
In this part of the interview, I seek to gain an insight into the organisational perceptions of citizenship, the context-specific conceptualisations, and an understanding of how regional actors construct citizenship, and the individual dimensions, respectively.
- *What does citizenship mean to you?*
- *What do you think is a particular characteristic of citizenship in ASEAN/ECOWAS/Southeast Asia/West Africa?*
- *How do you think these characteristics differ from national citizenship?*

- *What rights do citizens in West Africa/Southeast Asia have that outsiders do not?*
- *What is the relation between regional integration, community building, and rights?*
- *What role do (the specific institution/department) have concerning regional rights – can you explain the main institutions' responsibilities?*
- *What does it mean to have the right to access a community? (Refer to the specific protocols and institutional documents)*
- *Which mechanisms allow citizens to gain access to policymaking/political discussions regionally?*
- *What does belonging mean to you?*
- *How is regional belonging (identity, cohesion, connectivity) understood?*
- *How is ASEAN/ECOWAS developing regional belonging/identity?*
- *Can you tell me more about how regional membership (identity/connectivity/community) is made by ASEAN/ECOWAS?*

Part 2. Citizenship and regional integration

In the second part of the interview, I try to unpack the relationship between citizenship, community-building, and regional integration.

- *How do you think citizenship making and regional community building relate?*
- *In what way do you think the ASEAN/ECOWAS promotion of a regional community affects the understanding of citizenship/belonging/identity/community?*
- *How do you think ASEAN/ECOWAS think about regional rights/access/belonging (in relation to the regional integration agenda/specific polity)?*
- *How has the relation between citizenship and regional integration/community building developed since 1997 (ASEAN)/1979 (ECOWAS)?*
- *What did the formation of AHRD/AICHR/ECOWAS court/certain departments mean for the regionalisation of rights/access/belonging?*
- *What do you think are the main challenges when forming regional policies?*
- *What is challenges ASEAN/ECOWAS staff meet when discussing regional approaches to citizenship issues/and the individual dimensions, respectively?*

- *What do you see as the current challenges when forming closer regional collaboration and integration between the ASEAN/ECOWAS Member States?*

Closure

When finishing the interview, sum up the main points which were discussed, mention the options on anonymity and consent, and ask for their opinion on persons/institutions who I should contact.

- *In your opinion, what should I know about citizenship/regional integration/community building that I have not already asked you about?*

Appendix 2
List of interviewees in Southeast Asia

The following tables provide information on the interviewees I interviewed during field research in Southeast Asia. In the first group are ASEAN officials and officials of ASEAN affiliated institutions, and in the second group are staff of non-governmental -and international organisations.

Group 1. ASEAN

Interviewee 1	Ivana Agustin, Senior Officer of External relations, Jakarta, Indonesia, 12 December 2018
Interviewee 2	Dinna Wisnu, National Representative to the ASEAN Intergovernmental Commission on Human Rights (Indonesia), Jakarta, Indonesia, 9 January 2019
Interviewee 3	Yuyum Paryani, National Representative to the ASEAN Commission on Women and Children (Indonesia, children section), Jakarta, Indonesia, 9 January 2019
Interviewee 4	Sri Danti Anwar, National Representative to the ASEAN Commission on Women and Children (Indonesia, women section), Jakarta, Indonesia, 11 January 2019
Interviewee 5	Pitchanuch Supavanich, Senior officer at the Labour and Civil Service Division, Jakarta, Indonesia, 11 January 2019
Interviewee 6	Miguel Musngi, Senior Officer at the Poverty Eradication and Gender Division, Jakarta, Indonesia, 11 January 2019
Interviewee 7	Elaine Tan, Executive Director of the ASEAN Foundation, Jakarta, Indonesia, 29 January 2019
Interviewee 8	Le Thi Nam Huong, Assistant Director of the ASEAN Human Rights Division, Jakarta, 29 January 2019

Interviewee 9   Barry Desker, National Representative to the ASEAN Intergovernmental Commission on Human Rights (Singapore), Singapore, 31 January 2019

Interviewee 10 Seree Nonthasoot, National Representative to the ASEAN Intergovernmental Commission on Human Rights (Thailand), Bangkok, Thailand, 18 February 2019

Group 2. Non-governmental -and international organisations

Interviewee 1   Paul Buckley, Regional Technical Officer at UNDP, Bangkok, Thailand, 21 November 2018

Interviewee 2   Herizal Hazri, Country Director of the Asia Foundation (Malaysia), Kuala Lumpur, Malaysia, 22 November 2018

Interviewee 3   Matcha Phorn-in, Executive Director of Sangsan Anakot Yawachon, Chiang Mai, Thailand, 27 November 2018

Interviewee 4   Davina Wadley, Coordinator at the Statelessness Network Asia Pacific (SNAP), Yangon, Myanmar, 7 December 2018

Interviewee 5   Chiaki Lee, Programme Manager of IOM, Bangkok, Thailand, 17 December 2018

Interviewee 6   Marja Paavilainen, Senior Programme Officer at ILO (ASEAN triangle project), Bangkok, Thailand, 18 December 2018

Interviewee 7   Nikola Errington, Protection Officer of Statelessness at UNHCR (Regional office), Bangkok, Thailand, 18 December 2018

Interviewee 8   David Rod, Protection Officer of Statelessness at UNHCR (Myanmar office), Yangon, Myanmar, 19 December 2018

Interviewee 9   Jelvas Musua, Senior Regional Protection Officer of Statelessness, Bangkok, Thailand, 24 January 2019

Interviewee 10 Renata Arianingtyas, Programme Officer for Religious Freedom and Human Rights at the Asia Foundation (Indonesia), Jakarta, Indonesia, 28 January 2019

Interviewee 11 Sinapan Samydorai, Director of ASEAN Affairs and Convenor of Task Force on ASEAN migrant workers at the Think Centre Singapore, Singapore, 31 January 2019

Interviewee 12 Moe Thuzar, Lead Researcher at the ISEAS-Yusof Ishak Institute, Singapore, 1 February 2019

Appendix 3
List of interviewees in West Africa

The following tables provide information on the interviewees I interviewed during field research in Abuja, Nigeria. In the first group are ECOWAS officials, and in the second group are staff of non-governmental -and international organisations.

Group 1: ECOWAS

Interviewee 1   Babatunde Afolabi, Political Affairs Officer and Head of Section, Abuja, Nigeria, 25 October 2019

Interviewee 2   Brown Odigie, Programme Officer of Mediation and former Migration Officer, Abuja, Nigeria, 30 October 2019

Interviewee 3   Aissata Yameogo-Koffi, Programme Officer of Customs, Abuja, Nigeria, 1 November 2019

Interviewee 4   Chris Appiah, Principal Programme Officer of Transport, Abuja, Nigeria, 1 November 2019

Interviewee 5   Paul Antoine Marie Ganemtore, Project Director of the Air Transport Division, Abuja, Nigeria, 4 November 2019

Interviewee 6   Tony Luka Elumelu, Head of Division on Free Movement and Migration, Abuja, Nigeria, 6 November 2019

Interviewee 7   Hafsatu Abdulkadir, Senior Counsellor of the ECOWAS Division at the Nigerian Ministry of Foreign Affairs, Abuja, Nigeria, 7 November 2019

Interviewee 8   Anita, Officer of the ECOWAS Division at the Nigerian Ministry of Foreign Affairs, Abuja, Nigeria, 7 November 2019

Interviewee 9   Abimbola Oyelohunnu, Programme Officer of Labour Migration, Abuja, Nigeria, 8 November 2019

Interviewee 10   Saidat Adeniran, Programme Officer of Transport, Abuja, Nigeria, 8 November 2019

Interviewee 11   Essien Abel Essien, Director of Department of Macro-Economic Policy and Economic Research, Abuja, Nigeria, 12 November 2019

Interviewee 12   Gideon Gbappy, Principal Programme Officer of the Department of Macro-Economic Policy and Economic Research, Abuja, Nigeria, 12 November 2019

Interviewee 13   Christopher Adaero, Head of Data Management, Abuja, Nigeria, 21 November 2019

Interviewee 14   Franck Afanyiakossou, Head of International Relations at the Office of the Vice President, Abuja, Nigeria, 22 November 2019

Interviewee 15   Bolanle Adetoun, Director of the ECOWAS Gender Centre, Abuja, Nigeria, 2 December 2019

Interviewee 16   Émile Zida, Head of the Culture Division, Abuja, Nigeria, 6 December 2019

Interviewee 17   Abdoulaye Issaka Maga, Director of the Department of Education, Science and Culture, Abuja, Nigeria, 6 December 2019

Interviewee 18   Kolawole Sofola, Principal Programme Officer of Trade, Abuja, Nigeria, 6 December 2019

Interviewee 19   Onyinye Onwuka, Head of the Political Affairs and International Cooperation Division, Abuja, Nigeria, 12 December 2019

Group 2: Non-governmental -and international organisations

Interviewee 1   Frantz Celestin, Chief of Mission of IOM, Abuja, Nigeria, 28 November 2019

Interviewee 2   Lealem Berhanu Dinku, Deputy in charge of Programmes of UNDP, Abuja, Nigeria, 29 November 2019

Interviewee 3   Lotte Kejser, Chief Technical Advisor to the Free Movement of Persons and Migration in West Africa at ILO, Abuja, Nigeria, 29 November 2019

Interviewee 4   Markus Topp, Senior Protection Officer at UNHCR, Abuja, Nigeria, 2 December 2019

Interviewee 5   Olubunmi Olaonipekun, Assistant Protection Officer and Statelessness Focal Point at UNHCR, Abuja, Nigeria, 2 December 2019

Interviewee 6   Silvia Cravesana, Associate Liaison Officer of UNHCR to ECOWAS, Abuja, Nigeria, 2 December 2019

Interviewee 7   Maria Kloss-Corell, Project Officer at the International Centre for Migration Policy Development (ICMPD), Abuja, Nigeria, 13 December 2019

Interviewee 8   Eleni Zerzelidou, Project Officer on Migration and Drugs Operation at the EU-Delegation to Nigeria and ECOWAS, 19 December 2019