



A COMPARATIVE STUDY AND ANALYSIS OF CIVIL LAWS IN IRAN, TURKEY, AND GERMANY WITH AN EMPHASIS ON ISSUES RELATED TO NATIONALITY AND THE RIGHTS OF FOREIGN NATIONALS

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ABSTRACT

This research aims to conduct a comparative study of civil laws related to nationality and the rights of foreign nationals in three countries: Iran, Turkey, and Germany. Given the legal, cultural, and historical differences among these countries, a comparative analysis can help better understand the legal challenges in the fields of nationality and immigration. The present study examines the concepts of nationality, conditions for acquiring citizenship, the rights and obligations of foreign nationals, as well as the status of marriage and residency in these countries. In Iran, nationality is based on the principle of *jus sanguinis* (right of blood), and the process of acquiring it is complex and influenced by cultural and religious factors. Additionally, there are significant restrictions on renouncing citizenship and dual nationality. In Turkey, nationality is generally independent of religion and is determined based on republican laws. Turkey has adjusted its immigration policies to attract foreign investors and labor. In Germany, nationality is defined according to modern legal principles aligned with European Union standards. Over recent decades, Germany has facilitated the acquisition of citizenship for immigrants by revising its immigration policies. The findings of this research reveal significant differences in the nationality laws of these countries, stemming from their historical, legal, and political backgrounds. These differences impact the rights of immigrants, residency policies, and international interactions. Given the trends of globalization and the increase in international migration, reviewing and reforming nationality laws is of particular importance. This study attempts to provide a comparative analysis, offering a framework for better understanding these issues and proposing appropriate solutions to improve the legal status of immigrants in Iran.

Keywords: Nationality, Immigration, Rights of Foreign Nationals, Civil Laws, Iran, Turkey, Germany

INTRODUCTION

In Iran, citizenship refers to the mutual rights and obligations between an individual and the state, and it adheres to moral and religious commitments based on the principle of sacrifice. The process of acquiring citizenship in Iran is complex and involves specific conditions such as the individual being Muslim, having knowledge and awareness of related issues, and commitment to the principles of the Islamic Revolution. In contrast, Germany is a country with a modern state and social legal system. In Germany, citizenship is granted based on the principle of civil rights without racial, religious, or cultural discrimination. The process of acquiring citizenship in Germany aligns with European Union laws and is generally independent of individuals' cultural or religious characteristics. Individuals who have lived in Germany for a specified period and meet certain conditions can obtain German citizenship. These differences highlight the significant challenges and distinctions in the perspectives and legal frameworks of citizenship in the two countries. On the other hand, in Turkey, citizenship is defined based on the principle of nationality and ethnicity. The conditions for acquiring citizenship in Turkey are generally independent of religious factors and are influenced by the laws of the Republic of Turkey. Individuals can obtain Turkish citizenship by following the established regulations and conditions, submitting an application, and receiving approval. These differences underscore the most striking disparities in the views and criteria of citizenship laws between the two countries.

Frequent changes in living conditions, the expansion of travel and migration, as well as the intensification of economic and cultural relations between countries, have increased the need for a detailed and comparative study of civil laws related to the rights of foreign nationals. It can be said that, according to legal scholars, even the protection of the environment and the achievement of the sustainable development goals of the agenda, as well as its implementation in countries to achieve sustainable development, depend on a thorough examination of the impacts of migrants and nationals of other countries. In this context, the purpose of the present research is to analyze and compare civil laws related to nationality and the rights of foreign nationals in three important countries: Iran, Turkey, and Germany. These countries have significant cultural, social, and legal differences, which can have a major impact on trade, migration, marriage, and other aspects of the rights of foreign nationals.

In Iran, the criteria for granting citizenship include birth, marriage, and other considerations. Additionally, Iran restricts the loss of citizenship for its people in certain cases. In Turkey, the allocation of citizenship is tied to various criteria such as birth, marriage, and military service. Turkey has provided pathways for immigrants to acquire citizenship, while Germany, emphasizing birth and the principle of citizenship, demonstrates its own distinct approach.

Accordingly, the aim of the present research is to examine and conduct a comparative study of the civil laws of Iran, Turkey, and Germany, with an emphasis on issues related to nationality and the rights of foreign nationals. The civil laws of these countries entail the analysis and comparison of differences and similarities in the legal rights and guarantees for immigrants among these nations. This analysis addresses a broad and comprehensive issue of immigrant rights in these countries and can lead to significant improvements in the social, economic, and cultural rights of immigrants. A comparative examination of nationality laws in Iran, Turkey, and Germany provides a unique opportunity to uncover differences and similarities in the legal systems of these countries, with the goal of enhancing policies and rights for foreign nationals. Investigating the alignment of nationality laws with human rights standards, particularly in relation to foreign nationals and immigrants, can offer an innovative perspective on the advancement of international law.

THEORETICAL FOUNDATIONS OF THE RESEARCH

Nationality:

In Iran, citizenship is primarily determined through the principle of "jus sanguinis" (right of blood). However, the choice between the systems of jus sanguinis or jus soli (right of soil) depends on the specific geographical, political, and economic conditions of each country, and there is no single, unchangeable system for this matter. For example, countries like the United States, which have adopted the jus soli system, have rapidly expanded their populations, while countries like Switzerland have relied more on the jus sanguinis system to maintain their population. Ultimately, the choice of citizenship system in each country is based on its specific needs and conditions, and this choice can, in various cases, lead to legal challenges. In Iranian law, citizenship generally has a straightforward and natural status, and Iran's citizenship laws are formulated based on international principles. In Iranian law, all individuals, regardless of religion or faith, are recognized as Iranian nationals, and according to Article of the Constitution, all Iranian citizens enjoy equal rights. Additionally, in accordance with Articles of the Constitution and some other laws, non-Shia Iranians are granted special rights that allow them to practice their religious and spiritual affairs in accordance with their own religious principles and rulings.

Social citizenship in Germany began in the late century when Bismarck introduced social legislation in response to the organization of labor unions and social democracy. During the Weimar Republic, social citizenship expanded to include unemployment insurance. After the establishment of the Federal Republic of Germany, it further expanded to encompass retirement pensions and later long-term care insurance. Social citizenship is highly controversial compared to its civil and political components and is based on the concept that equal citizenship status serves as a counter-response to inequalities generated by the market, aiming to ensure the legitimacy of capitalism in democracies. Through the lens of social citizenship, the gaps in the "standard employment" structure, which has guided German social policy for decades, can be identified. This structure includes a full-time husband as the breadwinner and a wife dedicated to household work and part-time jobs in the labor market, a model that aligns with broader gender norms. Regarding the loss of citizenship, the optional model, according to the German government, required a reservation to the European Convention on Nationality. Germany declared that the automatic loss of German citizenship might occur based on an optional clause in Article of the Nationality Act (choosing between German citizenship or foreign citizenship upon reaching adulthood) for individuals who, in addition to foreign citizenship, acquired German citizenship by birth in Germany (German Nationality Law reforms,). Regarding Article, Paragraph(f) and (g), Germany also stated that the loss of citizenship might occur if, after reaching adulthood or in the case of an adult who was adopted, it is determined that the conditions for acquiring German citizenship were not met (German Nationality Law reforms,).

The laws regarding citizenship and residency in Turkey are under strict government control and supervision. According to Law no on Turkish Citizenship, foreign nationals can acquire Turkish citizenship through various means. Marriage to a Turkish citizen: Marriage to a Turkish citizen is one of the common pathways to obtaining citizenship, but this process requires a minimum of three years of marital cohabitation. Foreign investors can obtain Turkish citizenship by investing a specified amount (minimum \$,) in real estate or by creating jobs for Turkish citizens. Foreign nationals who have resided continuously in Turkey for more than five years and have demonstrated the financial means to live in the country are eligible to apply for citizenship. However, these processes are highly complex and time-consuming. Applicants are required to submit extensive documentation, including a criminal record certificate, financial records, and residency documents.

Right to Education:

In Iran, the right to education is guaranteed under Article of the Constitution of the Islamic Republic of Iran, which obligates the government to provide free education at primary and secondary levels. This article is primarily designed for Iranian citizens. However, other legal provisions, including the Executive Directive issued by the order of the Supreme Leader, have facilitated access to public schools for foreign nationals, particularly Afghan refugees. This measure aims to address the educational needs of undocumented children who had previously been excluded from Iran's educational system.

In Germany, education is a fundamental right guaranteed by Article of the Constitution, which obligates the state to regulate and oversee education. This article ensures access to education for all children, including foreign nationals, and makes education non-discriminatory. According to the Residence Act, Section, foreign nationals, regardless of their legal status, have the right to access public education. This includes refugees, asylum seekers, and children of foreign nationals.

In Turkey, Article of the Constitution guarantees the right to education for all citizens and residents of the country. According to Law no on Foreign Nationals and International Protection, Turkey extends this right to foreign nationals, including refugees and migrants. This law ensures that children of foreign nationals have access to free primary and secondary education in public schools. As part of Turkey's obligations under international agreements such as the Refugee Convention, the country has made efforts to integrate foreign nationals into the education system, particularly those coming from war-torn regions.

The Right to Freedom of Occupation:

To compare the right to employment of foreign nationals in the civil laws of Iran, Germany, and Turkey, it is necessary to examine each country's approach to the issue of labor rights and employment of foreign nationals and analyze the relevant laws. This comparison can be divided into three main sections. (Table 1)

Table 1: Comparison Table of the Right to Employment for Foreign Nationals in Germany, Iran, and Turkey

Topic	Iran	Germany	Turkey
Legal Guarantees	Right to choose a job, unless it conflicts with Islamic principles or public interests.	Fundamental right to occupational freedom with regulations for public interest.	Legal right to choose a job, with oversight and legal regulations.
Restrictions	Based on Islamic principles, public interest, and ethics; gender discrimination and restrictions for foreign citizens.	Regulations for public safety; requirement for professional qualifications; restrictions for non-EU citizens.	Work permit required for foreign nationals; some jobs reserved for Turkish citizens.
Foreign Citizens	Significant barriers to employment; many jobs are only for Iranian nationals.	Access to jobs depends on EU/non-EU status and work permits.	Foreign nationals require work permits; some sectors are restricted for them.
Gender Equality	Legal and social restrictions for women in certain fields.	Anti-discrimination laws ensure gender equality.	Progress has been made, but challenges remain for women and minorities.

Right to a Fair Trial:

In the Constitution of the Islamic Republic of Iran, the principles of human rights and fair trial are generally guaranteed. Article of the Iranian Constitution explicitly states that "everyone has the right to seek justice in a competent court," and this right applies to all individuals, whether Iranian or foreign. Therefore, foreign nationals who enter Iran or reside in the country are also entitled to access to courts and a fair trial.

In Germany, as in Iran, the principles of fair trial and the right to defense are fully guaranteed for all individuals, whether they are German nationals or foreigners. According to Article of the German Constitution, all individuals, regardless of their nationality, have the right to access German courts and seek justice. Germany has a fully independent and developed judicial system in which foreign nationals enjoy rights similar to those of German citizens.

In Turkey, fair trial is guaranteed for all individuals, whether Iranian, German, or other foreign nationals, under the Constitution of the Republic of Turkey and the country's civil laws. According to Article of the Turkish Constitution, "Every individual has the right to access the courts and to be tried fairly and freely in legal proceedings." This article directly applies to foreign nationals as well, granting them equal rights in legal proceedings as Turkish citizens. The Turkish Civil Procedure Code, similar to those in Germany and Iran, does not discriminate against foreign nationals.

The Right to Fight Against Racial Discrimination:

In the Constitution of the Islamic Republic of Iran, racial discrimination is not directly and specifically mentioned. However, the general principles of equality and human rights before the law are guaranteed. Article of the Iranian Constitution explicitly states that "All citizens of the nation, both men and women, are equally protected by the law and enjoy all human, political, economic, social, and cultural rights." This principle generally supports human rights and equality before the law, but it does not specifically address racial discrimination.

In the German Constitution, known as the Basic Law, racial discrimination is explicitly prohibited. Article of the German Basic Law states: "No person shall be favored or disfavored because of sex, parentage, race, language, homeland and origin, faith, or religious or political opinions." This article specifically addresses racial discrimination and protects foreign nationals from any form of discrimination in Germany.

In Turkish civil law and civil procedure law, foreign nationals are specifically protected from racial discrimination. Additionally, Turkey is a party to international conventions, including the United Nations Convention on the Elimination of All Forms of Racial Discrimination, which prohibits racial discrimination based on race or nationality, even in the areas of employment and access to social services. The Law on the Fight Against Discrimination in Turkey prohibits racial discrimination in various fields such as the judiciary, workplace, education, and other public services. If a foreign individual in Turkey experiences racial discrimination, they can file a complaint through the courts, and if discrimination is proven, penalties will be imposed against the discriminator.

The Right to Freedom of Religion and Belief:

In the Constitution of the Islamic Republic of Iran, freedom of religion and belief is generally guaranteed under Article. This article states that "no one can be prosecuted for holding a particular belief." In principle, this allows individuals to freely hold their own beliefs. However, in practice, this freedom faces significant limitations in certain areas, particularly for foreign nationals entering Iran from non-Muslim countries.

In Germany, the right to freedom of religion and belief is clearly and explicitly guaranteed in

Article of the German Constitution. This article states that "freedom of religion, belief, conscience, and the free choice of religion are fundamental principles of the Federal Republic of Germany." Additionally, Article of the same constitution specifically refers to non-German individuals, stating that foreign nationals in Germany enjoy the right to freedom of religion and belief to the same extent as German citizens. In Germany, foreign nationals are entitled to all rights of religious freedom. They can freely choose their religion and engage in all religious activities without any restrictions. Furthermore, Germany, as a country with a multicultural society, provides an environment that is welcoming to various religions and religious freedoms, and this freedom is available to all individuals, including immigrants and refugees.

In the Turkish Constitution, freedom of religion and belief is explicitly stated in Article. This article states that "every individual has the right to freely choose their religion, beliefs, and philosophy of life, and there are no restrictions in this regard." Additionally, Article of the Turkish Constitution states that "all individuals are equal before the law, and no one can be discriminated against due to their religion or beliefs."

The Right to Freedom of Expression and Personal Security for Foreign Nationals:

In the Constitution of the Islamic Republic of Iran, freedom of expression is generally referenced. Article of the Iranian Constitution states that "no one can be prosecuted for holding a particular opinion." This article implicitly refers to freedom of expression, but in practice, freedom of expression in Iran is subject to certain legal frameworks and restrictions, particularly in areas that may be considered a threat to the Islamic Republic system or national security.

In Germany, freedom of expression and personal security are comprehensively and extensively recognized in the German Constitution. Article of the German Constitution explicitly guarantees the right to freedom of expression for all individuals, including foreign nationals. This article states: "Every person has the right to freely express and disseminate their opinions in speech, writing, and images, and to freely access information from generally available sources." This article makes no distinction between domestic and foreign nationals in the context of freedom of expression.

In the Turkish Constitution, freedom of expression is explicitly and clearly included in Article, which states: "Everyone has the right to express and disseminate their thoughts and opinions freely." However, this freedom of expression in Turkey can be limited under circumstances where national interests, the security of the country, or public order may be threatened. For this reason, threatening statements or content against national security may face legal penalties.

Family Rights and Privacy:

For foreign nationals, forming associations in Iran is a challenging task, and they cannot establish political or human rights organizations unless they obtain government approval. While social and cultural associations may be permitted, political organizations are generally not allowed. Foreign nationals engaged in such activities may face surveillance or legal action.

Turkey has established a legal framework that guarantees the freedom of assembly and the freedom of association for all individuals, including foreign nationals. These rights are widely recognized in the Turkish Constitution and various national laws. However, the country has faced criticism in recent years due to restrictions imposed on these rights in practice. Article of the Turkish Constitution guarantees the freedom of assembly for all individuals, including foreign nationals, stating: "Everyone has the right to hold peaceful assemblies and marches without prior permission."

Article of the German Constitution guarantees the freedom of assembly for all individuals, including foreign nationals, and states: "All Germans have the right to assemble peacefully and

unarmed in public gatherings." This right is fully applicable to foreign nationals as well, and there is no distinction between domestic and foreign citizens.

The Right to Presumption of Innocence and the Right to Defense for Foreign Nationals:

The right to family and privacy are considered fundamental human rights, recognized in many national and international laws. These rights must be respected not only for citizens of a country but also for foreign nationals. In Iran, the right to family and privacy are recognized under various laws, particularly under different articles of the Constitution of the Islamic Republic of Iran and the Civil Code. However, these rights for foreign nationals are subject to specific limitations compared to Iranian citizens (Table 2).

Table 2: Comparison of the laws of Iran, Turkey, and Germany regarding family rights and privacy for foreign nationals

Country	Family Rights	Privacy
Iran	Recognized, but with restrictions for foreign nationals marrying Iranians and their family rights.	Recognized, but under strict surveillance for foreign nationals, especially in political and security matters.
Turkey	Recognized, and foreign nationals can marry and form families.	Recognized, with no discrimination between domestic and foreign nationals in this regard.
Germany	Fully recognized, and foreign nationals have the same rights as domestic citizens.	Fully recognized, with no difference in privacy rights between foreign and domestic nationals.

Right to Travel and Residence:

The presumption of innocence and the right to defense are fundamental principles of criminal justice systems worldwide, ensuring that individuals are treated fairly under the law, especially when accused of a crime. The implementation of these principles is essential to protect both citizens and foreign nationals who may face legal issues in foreign countries. (Table 3)

Table 3: Comparison of the presumption of innocence and the right to defense for foreign nationals in Iran, Turkey, and Germany

Country	Presumption of Innocence	Right to Defense
Iran	Recognized, but may be disregarded in political cases for foreign nationals.	Recognized, but foreign nationals may face difficulties in accessing legal representation and defense.
Turkey	Fully recognized and applied to foreign nationals.	Fully recognized, and foreign nationals have the right to legal representation and an interpreter.
Germany	Fully recognized and applied to foreign nationals as well.	Fully recognized, and foreign nationals enjoy the same rights as German citizens.

The Right to Access Effective Legal Remedies:

The right to travel and the right to reside are fundamental rights that enable individuals to move freely within and outside the country and to choose their place of residence (Table 4).

Table 4: Comparison of the right to travel and residence for foreign nationals in Iran, Turkey, and Germany

Country	Right to Travel	Right to Reside
Iran	Foreign nationals can travel within Iran, but there may be restrictions. They require a visa for entry.	Foreign nationals need a residence permit for long-term stays, and permanent residency is difficult to obtain.
Turkey	Foreign nationals can travel freely in Turkey, but their entry depends on visa requirements.	Various types of residence permits are available for different purposes.
Germany	Foreign nationals can travel freely in Germany, provided they comply with visa requirements.	Short-term and long-term residence permits are available for various purposes.

The Right to Freedom of Business Activities for Foreign Nationals:

The Iranian Civil Code addresses general provisions related to property rights and contracts, while the Commercial Code specifically regulates laws pertaining to commercial transactions, partnerships, and business activities. Foreign nationals can participate in business activities in Iran, but they are required to comply with regulations that impact their businesses.

The German constitution guarantees the right to freedom of choice of occupation and profession for both citizens and foreign nationals. According to Article, every individual has the right to freely choose their occupation, establish a business, and engage in commercial activities. This right also applies to foreign nationals, allowing them to participate in business activities under the same conditions that apply to domestic businesses.

According to Article of the Turkish Constitution, every individual, including foreign nationals, has the right to engage in commerce and establish a business. This right falls under the principle of freedom of enterprise and allows foreign nationals to set up businesses in Turkey, provided that they comply with the relevant regulations.

CONCLUSION

In summary, a comparative analysis of civil laws pertaining to foreign nationals in Germany, Iran, and Turkey reveals that Germany, as a country with advanced immigration policies, grants the most rights to foreign nationals. By providing opportunities for permanent residency afteryears, granting citizenship afteryears, and offering access to extensive social services such as health insurance and free education, Germany enables immigrants to integrate easily into society. Additionally, Germany offers foreign nationals' equal conditions in terms of labor and employment rights as domestic citizens and facilitates their participation in civic activities. In comparison to Germany, Iran imposes more stringent conditions on foreign nationals. Compared to Iran, Turkey and Germany have more open and supportive policies regarding education for foreign nationals, especially at the primary and secondary levels, where access is unrestricted in Turkey and Germany. In contrast, Iran faces limitations at higher education levels due to specific laws and admission processes. Therefore, Germany and Turkey have made more progress, particularly in providing equal educational opportunities for foreign nationals.

In Iran, the rights of foreign nationals may vary depending on specific conditions and the type of permit. Iran guarantees the right to freedom of occupation, but this right is limited by Islamic principles, public interests, and specific laws. Additionally, foreign citizens and women face significant restrictions in certain areas. Germany offers strong protections for occupational

freedom, with minimal restrictions except in specific professions and for non-EU citizens who require work permits. Anti-discrimination laws promote inclusion. Turkey legally guarantees the right to occupational freedom, but there are restrictions for foreign citizens and refugees. Considering the examination of civil and judicial laws in Iran, Germany, and Turkey, it can be said that the right to a fair trial for foreign nationals is, in principle, legally guaranteed in all three countries. Although these three countries have established principles in their laws to combat racial discrimination, in practice, their levels of success vary. Germany, with its strong legal system, Turkey, with its challenges in law enforcement, and Iran, with the conflict between laws and practical procedures, each follow their own unique path in addressing racial discrimination. Improving the legal and social conditions in these countries requires more effective implementation of laws, increased public awareness, and the establishment of independent oversight institutions. The right to freedom of religion and belief for foreign nationals in Turkey, Iran, and Germany is influenced by the legal, cultural, and political systems of these countries. Germany, with its open and supportive approach, provides the best conditions for the freedom of religion and belief for foreign nationals. Turkey, in comparison to Germany, has more restrictions but still offers greater freedom than Iran.

Considering the results of the revision in laws granting citizenship to children of Iranian mothers and facilitating the process of obtaining citizenship for them, it is recommended to regulate fair labor laws for foreign nationals, including fair wages, insurance, and the right to file complaints in cases of exploitation. Additionally, the government should be obligated to provide basic and emergency medical services to foreign nationals without discrimination. Specialized courts should be established to handle cases related to foreign nationals to reduce their legal difficulties. Furthermore, legal and social education should be provided to foreign nationals in Iran to inform them of their rights and obligations.

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