

ASSESSING LANGUAGE POLICY. THE TREATMENT OF RUSSIAN IN ESTONIA AND SPANISH IN CATALONIA*

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El resum és al final de l'article.

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Le résumé se trouve à la fin de l'article.

Estonia and Catalonia share a similar (post-totalitarian) linguistic situation but show two different political responses to it, especially in their treatment of Russian and Spanish. In officially monolingual Estonia, Russian is a «foreign» language with limited linguistic facilities (including Russian-medium schools); in Catalonia, Spanish is a (co)official language with extensive linguistic rights (excluding Spanish-medium schools). This paper identifies a number of areas in which Estonian language policies have been controversial with respect to the compliance with the standards set forth by the Framework Convention for the Protection of National Minorities. In every instance, the Estonian reaction to international criticism has been to adopt an option that was already operative in Catalonia. Drawing on this, the paper claims that Catalonia might be a model for Estonia (not the other way around) and that Estonia might end up by turning into a bilingual polity of the Catalan kind.

Key words: Catalan language, Estonian language, Framework Convention for the Protection of National Minorities, (comparative) language policy.

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1. The language situation

The goal of this paper is to draw a comparison between the contemporary language policies of Estonia and Catalonia, an endeavor that does not happen to be very popular, as only Laitin (1992) and (just in passing) Druviete (1997b) have taken up the issue in the past. Estonia and Catalonia respond politically in two different ways to two rather similar linguistic situations. Both Estonia and Catalonia have a relatively homogeneous linguistic past which was put to an end by massive immigration in the second half of the 20th century, and this process took place in a context of political subordination within a totalitarian regime, which was clearly detrimental to the local language (Skerret, 2007). Ethnic Estonians constituted 97.3% of Estonian population back in 1945 (Rannut, 2004a, 2004b). In the case of Catalonia, no data on «ethnic groups» are available, but if there *were* data they would not be radically different. The main difference between Estonia and Catalonia is one of timing: Spanish-speaking immigrants began pouring into Catalonia earlier (in the twenties of the 20th century) than their Russian-speaking counterparts in Estonia. But neither in Estonia nor in Catalonia is one able to forget the long-term cultural influx of Russian and Spanish, respectively.

If we leave ethnicity aside (which is always a shaky concept) and turn to mother / native / first language, the Estonian population census of 2000 shows the following results:

TABLE 1. *Mis on Teie emakeel?* («What is your native language?»)

	<i>Absolute numbers</i>	<i>%</i>
Estonian	921.817	67,3
Russian	406.755	29,7
Other	41.480	3,0
	<i>1.370.052</i>	<i>100,0</i>

Source: 2000 Estonian population census

In Spain population censuses do not collect information on the mother / native / first language of people. In the absence of census data, we must turn to survey data. According to the *Estadística d'Usos Lingüístics de la Població* of 2008 (from now on EULP), Spanish is well ahead of Catalan as first language and less so as «own» language, as there are more people who consider Catalan to be their language than people who have it as first language. This is due to the well documented fact that a number of former Spanish speakers now consider Catalan to be their language (Torres, 2005; Fabà, 2009). Previous surveys had shown a more balanced situation (Siguan, 1994, 1999), but recent waves of immigration have tipped the balance in favor of Spanish and also turned Arabic into Catalonia's third language.

TABLE 2. *Recorda quina llengua va parlar primer vostè, a casa, quan era petit/a?* («Do you remember what language you spoke first, at home, when you were a child?»)

	<i>Absolute numbers (thsd.s.)</i>	<i>%</i>
Spanish	3.389,0	55,0
Catalan	1.949,5	31,6
Both	236,5	3,8
Arabic	162,3	2,6
Other	375,0	6,1
	<i>6.162,5</i>	<i>100,0</i>

Source: EULP 2008. Population aged 15 and above

TABLE 3. *Quina és la seva llengua?* («What is your [own] language?»)

	<i>Absolute numbers (thsdts.)</i>	<i>%</i>
Spanish	2,867,5	46,5
Catalan	2.295,3	37,2
Both	542,8	8,8
Arabic	149,2	2,4
Other	244,2	3,9
	6.162,5	100,0

Source: EULP 2008. Population aged 15 and above

Both in Estonia and Catalonia, linguistic groups are not evenly distributed throughout the territory. In Estonia, Russian-speakers tend to concentrate in the north-eastern corner of the country (Ida-Viru county) and the city of Tallinn (Harju county). In Ida-Viru Russian-speakers form a clear majority; the city of Narva is well-known for its overwhelming Russian-speaking majority. In Tallinn, Estonian-speakers and Russian-speakers are close to a tie (Estonian 52.4; Russian 43.2). In Catalonia, Spanish-speakers are concentrated in major cities, especially Barcelona and its metropolitan area. In the city of Barcelona there used to be also something close to a tie, with Spanish-speakers now taking the lead.

2. The language regime

As mentioned before, on these two broadly similar linguistic situations Estonia and Catalonia operate two apparently different language policies. Leaving sign language aside, Estonia is an officially monolingual state, whereas in Catalonia both Catalan and Spanish are official.

TABLE 4. Official languages in Estonia and Catalonia

<i>Estonia</i>	<i>Catalonia</i>
1 official language (Estonian)	2 official languages (Catalan and Spanish)

We use the word «apparently» because if one looks deeper into this matter one realizes that differences are not that extreme. To show this, we will draw on Cooper's insight that there are *three* different senses of «official language».

According to Cooper (1989: 100), «a language may be official in any or all of these senses»:

- *Statutory* official language: a language which a government has specified as official by law.
- *Working* official language: a language which a government uses as a medium for its day-to-day activities.
- *Symbolic* official language: a language which a government uses as a medium for symbolic purposes, i.e. as a symbol of the state.

To illustrate these three different senses of «official language», Cooper referred among others to Ireland, where both Irish and English are statutory and working official languages but Irish is the sole symbolic official language.

It is important to notice that whereas the statutory and symbolic senses are a yes/no matter, the working sense is a matter of degree. Speaking of Irish, Cooper (1989: 101) acknowledged that «its use as a working language is far less frequent than is the case with English», which he termed «the dominant language».

On the other hand, it is clear that we can combine the above categories and speak for instance of «statutory working [official] language» (a language which a government has specified as working language by law) or «statutory symbolic [official] language» (a language which a government has specified as symbolic language by law). There is also the possibility of distinguishing different levels of government, so that one can speak of the working language(s) of national, regional or local governments.

Bearing this in mind, let us have a look at § 6 of the Estonian constitution and § 3 of its Spanish counterpart:

§ 6. The official language of Estonia is Estonian.

§ 3. (1) Castilian is the official Spanish language of the State. All Spaniards have the duty to know it and the right to use it. (2) The other Spanish languages shall also be official in the respective Self-governing Communities in accordance with their Statutes.

Both Estonia and Spain have legally specified just *one* state-wide official language. The difference is, of course, that the Spanish Constitution also legally specifies that «the other Spanish languages» (meaning Catalan/Valencian,

Galician, and Basque) will be regional official languages. § 6 of the Catalan Statute of Autonomy does two things: on the one hand, it specifies Catalan as the official language of Catalonia, alongside with Spanish; on the other hand, it specifies Catalan both as Catalonia's *own* language and the «normal and preferential» language of use in Public Administration bodies (meaning regional agencies and local governments).

§ 6. (1) Catalonia's own language is Catalan. As such, Catalan is the language of normal and preferential use in Public Administration bodies and in the public media of Catalonia, and is also the language of normal use for teaching and learning in the education system. (2) Catalan is the official language of Catalonia, together with Castilian, the official language of the Spanish State. All persons have the right to use the two official languages and citizens of Catalonia have the right and the duty to know them.

In other words, the Catalan Statute of Autonomy legally specifies Catalan as Catalonia's symbolic language and as the «normal» working language of the Catalan administration. (The term «preferential» was declared invalid by the Spanish Constitutional Court in its 31/2010 decision. In this paper we will not be able to go into the political controversy triggered by this decision. In any case, Catalan remains the language of «preferential» use in Public Administration bodies and in the public media of Catalonia.)

In the second respect, the provisions of the Catalan Statute of Autonomy resemble that of § 52 (1) of the Estonian Constitution, which explicitly makes Estonian the (working) official language of state agencies and local governments:

§ 52. (1) The official language of state agencies and local governments shall be Estonian.

This constitutional principle is instantiated in § 3 (1) of the Estonian Language Act:

§ 3. (1) The language of public administration in state agencies, local governments and agencies thereof (hereinafter local governments) and the language of service and command in the Estonian Defence Forces shall be Estonian. Exceptions are provided for in Chapters 2, 3 and 4 of this Act.

In terms of Cooper, behind the 2-official language regime of Catalonia simplistically depicted in Table 4, a more complicated picture appears. In Catalonia, both Catalan and Spanish are (statutory) official languages, but Catalan

is the only (statutory) symbolic language and it is also the (statutory) *dominant* working language.

On the Estonian side, a certain complexity also arises. Estonian is not a *statutory* symbolic language, but it is the only *de facto* symbolic language of Estonia nonetheless. And, as we will see now, although Estonian is clearly the (statutory) working language of state agencies and local government, other (statutory) working languages are allowed in principle in local governments of a certain type.

Unlike the Spanish Constitution, the Estonian one does not allow for regional *official* languages, but still it acknowledges the possibility to use a language other than Estonian as an internal working language of relevant local governments (as a local official language, that is). The same section of the Estonian Constitution that specifies Estonian as the language of state agencies and local governments makes room for this:

§ 52. (2) In localities where the language of the majority of the residents is not Estonian, local governments may, to the extent and pursuant to procedure provided by law, use the language of the majority of the permanent residents of the locality as an internal working language.

Rannut (2004a, 2004b) terms this a «bilingual (territorial) language regime». According to this, § 52 (2) of the Estonian Constitution «enables the existence of the official bilingual language regime in an officially monolingual state» (Rannut, 2004b: 47).

Later on we will see how this constitutional principle is worded in § 11 of the Language Act. Now, it should be noticed that the possibility offered to local governments is bounded in time. According to § 41 (3) of the Estonian Law on Local Government Organisation, «the permission granted on the proposal of the corresponding local government council pursuant to § 11 of the Language Act» is not once for all but «shall be valid until the authority of the corresponding council terminates». Of course, more significant than this is the fact no permission of this kind has ever been granted to any local government (Poleshchuk, 2000; Rannut, 2004a, 2004b).

On the other hand, § 51 (2) of the Estonian Constitution also recognizes a linguistic *right* (not just a possibility) that is typical of official languages:

§ 51. (1) Everyone has the right to address state agencies, local governments, and their officials in Estonian and to receive responses in Estonian. (2) In localities

where at least one-half of the permanent residents belong to a national minority, everyone has the right to also receive responses from state agencies, local governments, and their officials in the language of the national minority.

Later on we will see how this constitutional principle is worded in § 10 of the Language Act. Now notice that the Estonian constitution recognizes the right to *receive* responses from state agencies, local governments, and their officials in the language of a national minority, but not the right to *address* them in the language of a national minority. As for the oral use of such a language before administrative authorities is regulated in a sui generis fashion (not in terms of rights, that is) in § 8 of the Language Act, as we will see later.

To summarize, our simplistic Table 4 has turned into a more complex one:

TABLE 6. Official languages in Estonia and Catalonia

<i>Estonia</i>	<i>Catalonia</i>
1 symbolic language —not specified by law (Estonian)	1 symbolic language —specified by law (Catalan)
1 statutory language (Estonian)	2 statutory languages (Catalan and Spanish)
1 working language of state agencies and local governments —specified by law (Estonian)	1 <i>dominant</i> working language of regional agencies and local governments —specified by law (Catalan)
Other possible working languages of local governments —specified by law (Russian)	1 <i>secondary</i> working language of regional agencies and local governments —specified by law (Spanish)

Against this background we can reanalyze the debate about the number of official languages of Estonia. It is well known that the idea has been explicitly rejected of specifying Russian as Estonia's second official language. Talking about all three Baltic states, Druviete (1997a: 181f) made herself clear: «why can't Russian be declared the second official language in the Baltic states? [...] Such an idea must be rejected. The proclamation of Russian as second state language would perpetuate the existence of monolingual population and the fragmentation of society (Diachkov 1994). It is known that under unequal power relationships, equal treatment produces unequal conditions. [...] If there were an official status for Russian, too, the still-existing asymmetrical bilingualism would become deeper, and Latvian, Lithuanian,

and Estonian would lose more and more functions». In the same vein, Ozolins (2002) stated that in Estonia «there is an explicit rejection of an official two-language policy which would be a perpetuation of the previous regime and a further erosion of the local national languages».

Seen from the point of view of Cooper, this debate is quite nominal. Whatever Druviete and others say, Russian is already Estonia's second *working* official language. On the one hand, Russian is one of the languages that might be declared working language of relevant local governments in view of what Rannut generously terms the Estonian «bilingual territorial regime». On the other hand, Russian is *de facto* a working language of certain local governments. Witness what Ilmar Tomusk, head of the Language Inspectorate of Estonia, said in a 2004 interview at the news agency Regnum with respect to the use of Russian in local governments (translation from Russian is ours):

«How did the situation with respect to the use of Estonian change in the past 10 years? [...]

In many local governments paperwork takes place in Russian, given that a bad mastery of Estonian or the complete lack of such mastery by city councilors or local civil servants does not allow them to use Estonian in this respect. In some local governments, and also in some municipal institutions (for instance in some police stations) translators are hired who translate into Estonian the documents that civil servants have prepared in Russian. There are also such local governments, where sessions of the city council (legislative power at local level) take place in Russian and members of these councils who are Estonian also have to act in Russian.»

«Many city councilors, for instance in Narva's and Kohtla-Järve's city councils, are almost unable to use Estonian as a working language in full measure. Doesn't it lower the work capacity of local governments? Yes, I almost answered to this already. In our last visit to the councils of Narva, Sillamäe and Kohtla-Järve it became clear that each of these cities developed its own practice with respect to the use of language in the sessions of the city council. Whereas in Sillamäe translation is rejected and work is done basically in Russian (Russian is used even by Estonians), in Kohtla-Järve they try to hold sessions of the city council in Estonian, which means that Estonian is used even by non-Estonians. And in Narva the most important points of the order of the day are discussed in a previous unofficial session (in Russian), but in the official session of the city council all decisions are formulated in Estonian nonetheless.»

Let us now conclude this section. As we said at the outset, Estonia's and Catalonia's language policies seem very different, but if we look deep into this

matter we discover that differences are no that big; in both instances, the local, (sole) symbolic language is also the (main) working language of state (regional) agencies and local governments. As a matter of fact, one could even say that the use of Russian in Estonia's local governments is more widespread than the use of Spanish in their Catalan counterparts. What is different in each case is the level of recognition of the other main language of the population (Russian in Estonia and Spanish in Catalonia) in terms of the linguistic rights granted to their speakers. (To this we turn below.) And of course what is *very* different is the view on the threat that this other language poses to the continuance of the local, symbolic language. According to the Estonian point of view, effective protection of Estonian *requires* a strict monolingual state, whereas in Catalonia effective protection of Catalan is regarded as compatible with a bilingual polity. In the following section we will discuss how Estonia has been criticized in recent times for not meeting the standards that Estonia engaged itself to meet when she ratified the Framework Convention for the Protection of National Minorities. In the light of these criticisms Estonia does have changed certain aspects of her language policy. Significantly enough, what Estonia has done in every instance is to adopt the Catalan preexistent solution. This circumstance might help us ground the pretension that Catalonia should become an explicit model for Estonia not the other way around.

3. The compliance with international standards

There is a widespread consensus that Estonia's language policies have not led to any violation of human rights. Rannut (1995: 208) observed that «there have been numerous human rights missions to Estonia, 15 since the restitution of independence, none of which have found any gross or systematic violations of human rights». Ozolins (2003: 219) supported this claim citing the former OSCE's High Commissioner for National Minorities, Max van der Stoep, who in 1993 «backed the observations of previous delegations in finding “no evidence of persecution of the Russian-speaking minorities in the Baltic States”». And Druviete (1997a: 169) also reminds us of the fact that the language policy of the Baltic States has been the object of monitoring by a number of international organizations and that «the observers did not uncover gross and systematic violations of human rights». According to her, «neither the linguistic legislation nor the practice in the Baltic States gives ground for the infringement of the linguistic human rights of minorities at an individual or collective level» (Druviete, 1997a: 183).

Yet Estonia's language policies have given rise to problems with respect to the very international standards that enshrine human rights. In this context, scholars like Ozolins (1999: 43; 2003: 226s) have complained about the pressures put on Estonia to conform to often «invented» international norms, specially in the times prior to Estonia's accession to the European Union. We will not go into this argumentation. To make our discussion more tangible and less prone to diverging interpretations, in this paper we will stick here to the implementation of the Framework Convention for the Protection of National Minorities, a set of (clearly non invented) international standards that Estonia has explicitly agreed to comply with, and we will concentrate on three very specific issues in which Estonia has not fared (or does not fare) well in the opinion of the Advisory Committee that monitors the implementation of the Framework Convention.

As Tsilevich (2001: 152) put it (*italics are ours*), «the array of the linguistic legislation which has emerged [...] is usually evaluated as being “essentially in conformity” with the international obligations of the Baltic states. *However, serious criticism has also been directed at several provisions*». The three issues we will discuss here are (i) the right to use minority languages before public authorities, (ii) the language proficiency requirements in elections, and (iii) the use of minority languages in (private) signs. We leave consciously aside two much-discussed issues that would demand separate papers: the issue of the language proficiency requirements for the acquisition of Estonian citizenship and the issue of language in education.

3.1. A preliminary question. Are Russian speakers covered by the Framework Convention?

In order to assess the implementation of the Framework Convention for the Protection of National Minorities in Estonia, the question must be settled whether Estonia's Russian speakers qualify as a national minority.

As is well known, the Framework Convention does not provide a definition of «national minority» of its own. In the instrument of ratification of the Framework Convention, Estonia reproduced the definition of «national minority» that appeared first in the Estonian National Minority Cultural Autonomy Act. According to this, Estonia considers as «national minority» those *citizens* of Estonia who:

- reside on the territory of Estonia;

- maintain longstanding, firm and lasting ties with Estonia;
- are distinct from Estonians on the basis of their ethnic, cultural, religious or linguistic characteristics;
- are motivated by a concern to preserve together their cultural traditions, their religion or their language, which constitute the basis of their common identity.

Significantly, and unlike many other states (e.g. Austria, Denmark, Germany, the Netherlands, Slovenia, Sweden), Estonia did not specify *what* Estonia's national minorities are.

The above definition aroused the criticism of the Advisory Committee on the Framework Convention. In its first opinion on Estonia (2001) the Advisory Committee considered the definition to be «restrictive in nature»:

«the above declaration is restrictive in nature. In particular, the citizenship requirement does not appear suited for the existing situation in Estonia, where a substantial proportion of persons belonging to minorities are persons who arrived in Estonia prior to the re-establishment of independence in 1991 and who do not at present have the citizenship of Estonia.»

Notice that the citizenship requirement is criticized not in itself but rather «for the existing situation in Estonia». Otherwise the Advisory Committee position would be a case of double standard, for the truth is that other contracting states have not been criticized for using a citizenship requirement in their instruments of ratification. (For instance, Germany states that «National Minorities in the Federal Republic of Germany are the Danes *of German citizenship* and the members of the Sorbian people *with German citizenship*. The Framework Convention will also be applied to members of the ethnic groups traditionally resident in Germany, the Frisians *of German citizenship* and the Sinti and Roma *of German citizenship*».)

Following this opinion, the Advisory Committee proposed that the corresponding recommendation by the Committee of Ministers of the Council of Europe be worded in these terms:

«The Committee of Ministers concludes that the declaration contained in the instrument of ratification of Estonia is restrictive in nature. It further concludes that it would be possible to consider the inclusion of persons belonging to additional groups in the application of the Framework Convention. The Committee of Ministers recommends that Estonia consider this issue in consultation with those concerned.»

In the final wording (2002), the Committee of Ministers watered the criticism somewhat down:

«Some of the initiatives to protect national minorities, such as the National Minorities Cultural Autonomy Act, contain elements that are not particularly suited for the present situation of minorities in Estonia and need to be revised or replaced in order for them to be effective with respect to all minorities concerned.»

Despite its own criticism, the Advisory Committee acknowledged that Estonia's approach to national minorities was *de facto* more inclusive than suggested in the above declaration:

«The Advisory Committee therefore welcomes that *de facto* the Government appears to take a considerably more inclusive approach to the protection of national minorities. In this connection, the Advisory Committee notes that in its dialogue with the Government on the implementation of the Framework Convention, the Government agreed to examine also the protection of persons not covered by the said declaration, including non-citizens.»

In the specific case of the use of Russian in contacts with administrative authorities, the Advisory Committee welcomed «the fact that there is a tendency not to give in this context much weight to the restrictive definition of the term national minority».

In its second opinion on Estonia (2005), the Advisory Committee insisted on the point that:

«the authorities should continue to pursue an increasingly inclusive approach in legislation, policies and practices concerning persons belonging to national minorities. The proposed changes to the National Minority Cultural Autonomy Act and/or the proposed new law on national minorities would provide a suitable context for consolidating such an inclusive practice in legislation. This would send a strong message of inclusion to the persons without citizenship and other persons belonging to minorities who are currently formally outside the scope of the declaration issued by Estonia under the Framework Convention.»

And again the Advisory Committee noticed that the suggested «inclusive approach» was already put into practice:

«The Estonian authorities recognise that the above-mentioned declaration, rather than guiding policies and practices, has mostly a “political-historical” meaning in today's Estonia. In an important statement contained in the second State Report, the authorities explicitly endorse the inclusive approach by noting that, while the

declaration specifies the direct beneficiaries of the provisions of the Convention, “it is also apparent that all provisions of the Framework Convention are applicable in practice without any substantive limitations, and the norms of the Convention are equally available for all persons who consider themselves belonging to national minorities”.

In this connection, the Advisory Committee suggested the following recommendation, which was literally upheld by the Committee of Ministers. The Estonian authorities were invited to:

«address shortcomings in the National Minority Cultural Autonomy Act by drawing up, in consultation with those concerned, legislation that is more inclusive and takes better into account the present-day concerns of persons belonging to national minorities.»

In the light of the above discussion we will conclude that Estonia’s Russian speakers do qualify as a national minority for the purposes of the Framework Convention. This corresponds both to the Advisory Committee’s expectations and to the Estonian authorities’ *de facto* approach to this matter.

3.2. The right to use Russian before public authorities

As we said before, § 51 (2) of the Estonian Constitution states that «in localities where at least one-half of the permanent residents belong to a national minority, everyone has the right to also receive responses from state agencies, local governments, and their officials in the language of the national minority». This constitutional right is instantiated in § 10 of the Language Act:

§ 10. (1) In local governments where at least half of the permanent residents belong to a national minority, everyone has the right to receive answers from state agencies operating in the territory of the corresponding local government and from the corresponding local government and officials thereof in the language of the national minority as well as in Estonian.

In its first opinion on Estonia (2001), the Advisory Committee observed that:

«the numerical threshold for the right to receive replies from a state or local government agency in a minority language —i.e. the requirement that at least half of the permanent residents of the locality at issue belong to a national minority— is high from the point of view of Article 10 of the Framework Convention.»

Article 10 of the Framework Convention certainly refers to areas «inhabited by persons belonging to national minorities traditionally or in substantial numbers». It is not only that the «at least half» criterion is far more demanding than the «substantial numbers» one; the «at least half» criterion is also far more demanding than the thresholds that have been set up in other countries like Finland (6-8%), Slovakia (20%) or Croatia (33%).

At the same time, the Advisory Committee acknowledged that the use of the Russian language in contacts with administrative authorities is widely accepted in a number of areas inhabited by a substantial number of persons belonging to national minorities.

Notice that § 51 (2) of the Estonian constitution recognizes the right to *receive* responses from state agencies, local governments, and their officials in the language of a national minority, but not the right to *address* them in the language of a national minority.

The possibility (not the «right») to address state agencies, local governments, and their officials in Russian is regulated in § 8 of the Language Act. In its former (1999) wording, this section read as follows:

«In oral communication with public servants and employees of state agencies and local governments, persons who are not proficient in Estonian may, by agreement of the parties, use a foreign language which the public servants and employees understand. If no agreement is reached, communication shall take place through an interpreter and the costs shall be borne by the person who is not proficient in Estonian.»

Notice that there is no threshold required for the fulfillment of this possibility.

It seems that the Advisory Committee incurred a misunderstanding here. In its first opinion (2001), the Committee overlooked this issue, and in its second opinion (2006) it claimed that the use of a «foreign language» in oral communication had been first introduced in a 2002 amendment of the Language Act:

«Following amendments to Article 9 (*sic*) of the Language Act, which entered into force in January 2002, it is now legal to use a “foreign language” in oral communications with officials of state agencies and local government “by agreement of the parties”. This provides an improved legal basis for the practice, common in some areas, of using Russian in such contacts.»

If we leave the misunderstanding aside, the remarks made by the Advisory Committee in its second opinion are still significant:

«while improving legal certainty, the above-mentioned amendment provides only limited guarantees for persons belonging to national minorities as it leaves an overly large margin of discretion to the individual officials concerned as to whether persons belonging to national minorities may use their language in contacts with authorities without bearing interpretation costs.»

The real 2002 amendment of § 8 (not § 9) of the Language Act was twofold. On the one hand, the former § 8 turned into par. 4 of § 8, with a wording that added «notary's office, bailiff's office or certified interpreter or translator's office» as settings where oral communication may take place in a «foreign language» and opened the possibility of freeing the person not proficient in Estonian from bearing the costs of an interpreter in cases specifically provided by law.

§ 8. (4) In oral communication with servants or employees of state agencies and local governments, and in a notary's office, bailiff's office or certified interpreter or translator's office, by agreement of the parties, a foreign language which the servants or employees understand may be used. If no agreement is reached, communication shall take place through an interpreter and the costs shall be borne by the person who is not proficient in Estonian, unless otherwise provided by law.

On the other hand, § 8 of the Language Act was actually enlarged with three additional paragraphs that regulate the submission of documents in foreign languages:

§ 8. (1) If an application, request or other document submitted to a state agency or local government is in a foreign language, the agency has the right to require the person who submits the document to submit the translation of the document into Estonian, except in the case provided for in § 10 of this Act. (2) If a state agency or local government does not require promptly to submit the translation of an application, request or other document into Estonian, the document in a foreign language is deemed to be accepted by the agency. (3) In the cases provided by law, a state agency or local government has the right to require notarisation of the translation. If the required translation is not submitted, the state agency or local government may return the document or have it translated with the consent and at the expense of the person who submitted the document.

In other words, the 2002 amendment of § 8 of the Language Act introduced a brand new possibility, that of addressing (in writing) administrative au-

thorities in a «foreign language», depending on the willingness of the authorities concerned. Now, the combination of the amended § 8 and § 10 of the Language Act gives rise to an additional novelty, namely the possibility to submit written documentation in a «foreign language» without having to rely on the willingness of the state agency or local government concerned. § 8 (1) states the right of a state agency or local government to require the translation into Estonian of a document submitted in a “foreign language”, *except in the case provided for in § 10 of this Act*, that is, except «in local governments where at least half of the permanent residents belong to a national minority».

In the words of the Advisory Committee, this new connection between §§ 8 and 10 of the Language Act gives «more substantial guarantees» to the use of foreign languages, but these guarantees are still linked to the restrictive «at least half» threshold:

«More substantial guarantees, covering also the submission of written documentation to the authorities in a minority language, are applicable only in those local government units where at least half of the permanent residents belong to a national minority, which, as was pointed out in the first Opinion of the Advisory Committee, constitutes a high threshold.»

In its second opinion on Estonia (2006), the Advisory Committee concluded that:

«in the implementation of its legislation, Estonia should ensure that persons belonging to national minorities, in areas where they reside traditionally or in substantial numbers, have a true and effective possibility to use their minority language in relations with administrative authorities.»

Now, what the Advisory Committee recommended to Estonia (having mostly Russian in mind) corresponds exactly to what is granted to Spanish in Catalonia.

The use of the Spanish language in contacts with administrative authorities is accepted throughout Catalonia. This is precisely what the called right to linguistic choice amounts to that the Catalan Statute of Autonomy explicitly recognizes in § 33. This right has certain particularities. For the right to receive (written) answers in Spanish to be granted citizens have to explicitly request it, according to § 9 (1) of the 1998 Language Policy Act:

§ 9. (1) The Generalitat, local authorities and other public corporations of Catalonia, institutions and the licensed services and companies that they are responsible

for shall use Catalan in their internal procedures and in relations between each other. They shall also normally use it in their communications and notifications addressed to individuals or companies residing within the Catalan linguistic area, without detriment to the right of citizens to receive them in Castilian on request.

As far as the right to *address* administrative authorities is concerned, it is subsumed under the right of linguistic choice. § 33 of the 2006 Statute of Autonomy has reaffirmed what § 4 of the 1998 Language Policy Act had already made clear: everyone in Catalonia «is entitled to express themselves in either of the two official languages, verbally or in writing, in their relations as well as in private and public procedures».

3.3. Language proficiency requirements in elections

In its first opinion on Estonia (2001), the Advisory Committee bluntly stated that the Estonian language proficiency requirements in elections were not compatible with Article 15 of the Framework Convention:

«The Advisory Committee is of the opinion that these requirements have a negative impact on the effective participation of persons belonging to national minorities and that they are not compatible with Article 15 of the Framework Convention. Hence, the Advisory Committee considers that the abolition of these requirements should be pursued as a matter of priority in the context of the ongoing reform of the relevant legislation and welcomes the proposals that have been made to that effect.»

Adhering literally to this remark, the Committee of Ministers concluded that:

«the Estonian language proficiency requirements for candidates in local and parliamentary elections are not compatible with Article 15 of the Framework Convention and recommends that Estonia pursue the abolition of these requirements as a matter of priority.»

As the Advisory Committee observed in its second opinion (2006), Estonia «fully addressed» this recommendation «by removing the language proficiency requirements for candidates in parliamentary and local government elections through amendments, introduced on 21 November 2001, to the Riigikogu (Estonian Parliament) Election Act and to the Local Government Council Election Act». Witness the present wording of § 4 (4) of the Riigikogu Election Act:

§ 4. (4) Estonian citizens who have attained 21 years of age by the last day for the registration of candidates have the right to stand as candidates.

In exchange to this abolishment, Estonia reaffirmed Estonian as the sole working language of the Riigikogu. Witness § 158 of the rules of procedure of the Riigikogu:

§ 158. (1) The working language of the Riigikogu is Estonian. (2) Draft legislation, interpellations and other documents shall be submitted in Estonian. (3) Reports and comments shall be presented and questions shall be posed and replied to in Estonian.

Now, this combination of no language proficiency requirements in elections and the local language as the working language of the local Parliament is precisely the Catalan option. Catalonia has not established any language proficiency requirements for electoral candidates. § 56 (3) of the Statute of Autonomy is silent on this matter:

§ 56. (3) In accordance with electoral legislation, citizens of Catalonia, by virtue of their civil and political rights, are electors and eligible for election.

So is Spain's election act, which is deemed to cover the elections to Catalan Parliament as long as Catalonia does not have its own election act. Moreover, none of the proposals that circulate has ever mentioned the issue of making the knowledge of Catalan a requirement for candidacy. In the report of a Committee of Experts on the Catalan election law which was set up in 2007, the issue of language was simply not mentioned.

On the other hand, despite the lack of language proficiency requirements in elections, Catalan is still the working language of Parliament. Now, the remaining difference between Catalonia and Estonia is that in Catalonia the fact that Catalan is the working language of Parliament does not preclude the possibility that a given MP, in the exercise of their right to linguistic choice, expresses himself or herself in Spanish, both orally and in writing.

3.4. The use of Russian in (private) signs

In its first opinion on Estonia (2001), the Advisory Committee was also outspoken in its conclusion that Article 23 of the Language Act is not compatible with Article 11 of the Framework Convention:

«The Advisory Committee is seriously concerned about Article 23 of the Language Act, which provides that public signs, signposts, announcements, notices and ad-

vertisements shall be in Estonian. Despite a number of exceptions provided elsewhere in the Act, the Advisory Committee is of the opinion that this provision is so wide in its scope that it hinders the implementation of the rights of persons belonging to national minorities, especially since the term “public” appears in this context to encompass also a range of information provided by private actors and since the obligation to use Estonian is largely interpreted as excluding the additional use of a minority language. The Advisory Committee stresses that, to the extent that the provision at issue prevents a person belonging to a national minority from displaying signs and other information of a private nature visible to the public, it is not compatible with Article 11 of the Framework Convention. Bearing in mind that the expression “of a private nature” in Article 11 of the Framework Convention refers to all that is not official, there should not be a prohibition to use a minority language for example in a sign, poster or an advertisement of a private enterprise by a person belonging to a national minority. Against this background, the Advisory Committee is of the opinion that Estonia should revise the relevant legislation and practice with a view to guaranteeing full implementation of the Framework Convention.»

Once again, the Committee of Ministers quite literally adhered to this and recommended Estonia to revise the relevant legislation. Estonia took good notice of this recommendation and an amendment to the Language Act was passed in 2007, according to which a translation into a foreign language may be added to the Estonian text of public information.

§ 23. (1) Public signs, signposts, announcements, notices and advertisements shall be in Estonian, except in the cases provided for in §§ 13 and 15 of this Act. (2) A regional variety or translation into a foreign language may be added to the Estonian text of public information however, the text in the Estonian language shall have precedence and must not be less visible than the regional variety or translation into a foreign language. (3) In public events, the organiser of such events shall ensure the translation of essential information presented in foreign languages into Estonian.

Now, the mandatory use of the local language in signs coupled with the possibility to use any other additional language is again the Catalan option. This is the «at least» formula that the Language Policy Act adhered to:

§ 32. (3) Permanent signs and posters with general information and documents offering services provided to users and consumers in establishments open to the public shall be at least drawn up in Catalan.

4. Reconciling two principles in Estonia

In a presentation on national integration policies in Estonia Raivo Vetik once asked: «What other countries can learn from Estonia?» (Vetik, 2006: 1). Some Catalan scholars believe that Estonia, with its monolingual regime and its treatment of Russian as a «foreign» language, is a successful «language normalization process» and should be a model for Catalonia (Joan, 1996, 2002). The present writer is not so sure. As we have seen in this paper, Estonian language policy vis-à-vis her Russian-speaking population has been problematic in the light of international standards like the Framework Convention for the Protection of National Minorities. On the other hand, this very language policy has proven to be partially ineffective with respect to the overall goal of integrating non-Estonians into Estonian society. As Tsilevich (2001: 153) put it, having all three Baltic states in mind, «despite growing bilingualism and efforts aimed at the integration of their respective societies, Estonia, Latvia, and, to a much lesser extent, Lithuania, remain deeply divided along linguistic lines». In this connection, not only is the role of Estonian in everyday interethnic communication still modest: according to the 2007 Estonian Human Development Report, «the legitimacy of English as a local interethnic language of communication has grown considerably during the last five years». This same report warned about the possibility of Estonian as a national language not fully developing as in other nation-states of Western Europe.

Now, if Estonia is not a model for Catalonia, might Catalonia be a model for Estonia? The present writer is convinced that Catalonia's language policy might offer better conditions for the fulfillment of a synthesis of two principles that both independent scholars and international bodies expect Estonia to comply with. In the words of Tsilevich (2001: 153), to cope effectively with the alleged division of Estonian society along linguistic lines, «the efforts aimed at protection and promotion of the state languages must be reconciled with the legitimate concerns and interests of their sizeable Russian-speaking minorities». In the same vein, Doudou Diène, Special Rapporteur of the Human Rights Council Mission to Estonia (2008), recognized «the legitimate right of Estonia to protect and promote its official language» but also called for the protection of «minority languages» (read: Russian). In this connection, he recommended as a matter of priority:

«that the language policy in Estonia be subject to an open, democratic and inclusive debate, in close consultation with ethnic minorities and human rights organi-

zations, aiming at elaborating consensual strategies that better reflect the multilingual character of its society. This process should aim at promoting the living together of all the communities in Estonia on the basis of two principles: first, the legitimate right of the Estonian government to disseminate Estonian language among all residents and avoiding the process of asymmetric bilingualism that characterized the Soviet occupation; second, the respect for the existence of minority languages spoken by sizeable communities, in particular Russian, in full compliance with the Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities.»

In other words, what the United Nations Special Rapporteur wishes for Estonia might be already a reality in Catalonia. The legitimate right of the Catalan government to disseminate Catalan language among all residents and avoiding the process of asymmetric bilingualism that characterized the Francoist period is acknowledged; more specifically, the right to communicate in the Catalan language throughout the whole territory of Catalonia is provided in the law and honored in practice, at least as far as regional agencies and local governments are concerned. Yet at the same time the existence of Spanish is fully respected and the efforts aimed at protection and promotion of Catalan are reconciled with the interests of Catalonia's sizeable Spanish-speaking population.

Of course, it is quite improbable that, after reading this paper, Estonian authorities will suddenly rush into declaring Russian as Estonia's second official language. If a more feasible proposal is permitted to the present writer, a first step in the «catalanization» of Estonian language policy would be the ratification of the European Charter for Regional and Minority Languages (with Russian as an explicit target language), something that such diverse organizations as the European Commission against Racism and Intolerance or Amnesty International have already demanded. Ratification of the European Charter would not make Russian statutorily official, not even at a regional level. But its implementation would certainly safeguard the interests of Estonia's sizeable Russian-speaking population without necessarily *damaging* Estonian.

In the long term, if Estonian keeps on being the only symbolic language of Estonia and the dominant working language (both things do secure Estonian), and Russian is normally used in the terms of the Framework Convention and the European Charter, there will be little reason to insist on denying Russian the status of second (that is, *secondary*) state language of Estonia or the

status of regional official language in the relevant counties of Estonia. In other words, there might be little reason to prevent Estonia from fully adhering to the Catalan model.

To do this, Estonia should be able to remove the key obstacle for the understanding between the Estonian and Russian-speaking communities that Mr Diène identified in his visit to Estonia, namely «the view that the loyalty of the Russian-speakers to the Estonian state is questionable». Russian will be an official language of Estonia when (ethnic) Estonians accept that it is possible to fully identify with Estonia and live as loyal citizens while using *Russian*. In other words, Russian will be an official language of Estonia when (ethnic) Estonians fully depart from the «one state, one language» motto that still lurks in their heads if not in their policies.

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Resum

Avaluació de la política lingüística. El tractament del rus a Estònia i de l'espanyol a Catalunya

Albert Branchadell

Estònia i Catalunya comparteixen una situació lingüística similar (posttotalitària) però mostren dues respostes polítiques diferents a aquesta situació, especialment en el seu tractament del rus i el castellà. A Estònia, oficialment monolingüe, el rus és una llengua «estrangera» amb facilitats lingüístiques limitades (incloent-hi escoles en rus); a Catalunya, el castellà és una llengua (co)oficial amb amplis drets lingüístics (excloent-hi escoles en castellà). Aquest article identifica una sèrie d'àmbits en què les polítiques lin-

güístiques estonianes han estat motiu de controvèrsia pel que fa al compliment de les normes establertes pel Conveni Marc per a la Protecció de les Minories Nacionals. En tots els casos, la reacció d'Estònia a la crítica internacional ha consistit a adoptar una opció que ja era operativa a Catalunya. Basant-se en això, l'article sosté que Catalunya podria ser un model per a Estònia (no a l'inrevés) i que Estònia podria acabar convertint-se en una comunitat política bilingüe de la mateixa mena que Catalunya.

Paraules clau: català, estonià, Conveni Marc per a la Protecció de les Minories Lingüístiques, política lingüística (comparada).

Resumen

Evaluación de la política lingüística. El tratamiento del ruso en Estonia y del español en Cataluña

Albert Branchadell

Estonia y Cataluña comparten una situación lingüística similar (posttotalitaria) pero muestran dos respuestas políticas diferentes a esta situación, especialmente en su tratamiento del ruso y el castellano. En Estonia, oficialmente monolingüe, el ruso es una lengua «extranjera» con facilidades lingüísticas limitadas (incluyendo escuelas en ruso); en Cataluña, el castellano es una lengua (co)oficial con amplios derechos lingüísticos (excluyendo escuelas en castellano). Este artículo identifica una serie de ámbitos en los que las políticas lin-

güísticas estonianas han sido motivo de controversia con respecto al cumplimiento de las normas establecidas por el Convenio Marco para la Protección de las Minorías Nacionales. En todos los casos, la reacción de Estonia a la crítica internacional ha consistido en adoptar una opción que ya era operativa en Cataluña. Basándose en este argumento, el artículo sostiene que Cataluña podría ser un modelo para Estonia (no al revés) y que Estonia podría acabar convirtiéndose en una comunidad política bilingüe del mismo tipo que Cataluña.

Palabras clave: catalán, estonio, Convenio Marco para la Protección de las Minorías Lingüísticas, política lingüística (comparada).

Résumé

Evaluation des politiques linguistiques. Le traitement de la langue russe en Estonie et de la langue espagnole en Catalogne

Albert Branchadell

L'Estonie et la Catalogne ont une situation linguistique similaire (post-totalitaire) mais offrent deux réponses politiques différentes à cette situation, tout spécialement quant au traitement du russe et du castillan. En Estonie, officiellement monolingue, le russe est une langue « étrangère » qui bénéficie de services linguistiques limités (y compris des écoles en russe) ; en Catalogne, le castillan est une langue co-officielle disposant de vastes droits linguistiques (y compris des écoles en castillan). Cet article identifie un ensemble de domaines dans lesquels les politiques lin-

guistiques estoniennes ont constitué un objet de controverse en ce qui concerne l'accomplissement des réglementations établies par la Convention-cadre pour la protection des minorités nationales. Dans tous les cas, la réaction de l'Estonie à la critique internationale a consisté à adopter une option qui était déjà opérationnelle en Catalogne. En se basant sur ce fait, l'article soutient que la Catalogne pourrait être un modèle pour l'Estonie (et non l'inverse) et que l'Estonie pourrait finir par devenir une communauté politique bilingue du même type que la Catalogne.

Mots-clés: catalan, estonien, Convention-cadre pour la protection des minorités linguistiques, politique linguistique (comparée).