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SMALL STATES AND THE BIG EUROPEAN MIGRATION CRISIS: THE OPEN BORDERS CHALLENGE[1]

Abstract. *The article analyses EU small states' border policies in response to the European migration crisis from the summer of 2015 to March 2016, when the Western Balkan route was closed. Migration system theory and the theory of policy convergence are applied to study migration from a small-state perspective. Changes within the EU system and their influence on such states' border policies, the difference between destination and transit small states, along with small states' foreign policy strategies are addressed in particular. The dilemma for small states is between harmonising with the established EU policies or projecting autonomy by making certain unilateral moves while dealing with migrant flows at the borders. This article contributes to the scarce literature on migration from a small-state perspective, especially by analysing the experiences and dilemmas they share and the challenges arising from migrations. Croatia, Slovenia, Austria, Denmark and Sweden are used as case studies.*
Keywords: *migration crisis, EU, small states, migration system theory, theory of policy convergence*

Introduction and methodology

Migration is a global phenomenon occurring through time and space. It poses a challenge to contemporary world politics, visible, among other things, from the United States and the European Union proceeding to toughen their border controls to influence migration flows. The EU has been almost paralysed by the international disagreement about the massive influx of migrants[2]. In the last two decades, migration has reached extremely high levels and reflects several unsettled issues in need of addressing by academic research. This article studies migration from a small-state perspective by

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2 The author uses the term migrants for all categories of people who leave home to seek a new life in another region or country regardless of the causes of this decision.

applying an existing theoretical framework. Migration system theory and the theory of policy convergence are used to explain European small states' border policies in response to the European migration crisis (from early summer 2015 to March 2016, when the Western Balkan migration route was closed).

Small states (particularly small island developing states) have encountered several geographical challenges arising from their small land masses, fragmentation, peripherality, remoteness and isolation. On top of this come social challenges stemming from small populations, limited institutional and human capacity, and economic challenges due to the limited size of domestic markets, openness, export concentration, and strong dependency on the global economy. Finally, one should also mention environmental challenges, manifested in susceptibility to natural disasters and rising sea levels. In the past, small states were affected by migrations in the forms of brain drain, international recruitment, intra-country/regional migration or free movement within regional trade agreements, as well as migration induced by environmental change (Hope Khonje, 2015: 1–4). The European migration crisis placed different challenges before small states, which became transit or destination countries for the immense flows of migrants. Certain outcomes of migration have become dominant issues in IR studies, such as the rise of radical political movements, populism and securitisation. However, the study of how small states are affected by migration remains in its infancy (Pace, 2018). Therefore, one goal of this article is to help rectify the paucity of small-state studies problematising migrations, especially in relation to the EU framework and the European migration crisis.

The article addresses the following questions:
1. Is there policy convergence between small EU states' border policies and the Schengen Agreement?
2. How have changes within the EU system influenced small member states' border policies?
3. Is there a difference in the border policies of transit and destination small states? Which push and pull factors may be detected in the process?
4. Which foreign policy strategies have small states applied in response to the European migration crisis?

The author believes that different small states' border policies are the outcome of varying degrees of convergence with EU rules and norms (explained using the theory of policy convergence), dissimilar positions, and changing elements in the EU migration system (addressed by migration system theory). Despite the positive initial impulses and welcoming policies, the sheer number of migrants challenged the entire EU system, reflected in a lack of coordination and unilateral policies partly out of step with the Schengen Agreement.

A qualitative research approach is applied with analysis linked to relevant theories presented in the article. The following categories were assigned based on the research questions: (1) distinct border policies in relation to the Schengen Agreement; (2) changing elements within the EU system; and (3) push and pull factors.

According to Zielonka (2016), border management within the EU resembles a "neo-medieval empire with frontiers and overlapping circles of authority and allegiance". This externalisation of migration controls is seen as the "EU's goal to delocalize control outside of a state's sovereign territory". Therefore, hardening the external borders has become a major priority of the EU to compensate for having relaxed the internal borders (Bunyan, 1993). This process is visible in the Schengen Agreement framework with growing visa restrictions, tightening of immigration controls and ever wider data collection. The Dublin Regulation adhered to this logic by stipulating asylum-seekers must apply for asylum in their first country of arrival. These are typically small states on the EU's periphery, seen as being forced to share the heaviest burden of the migrant crisis (Mainwaring, 2011: 7). According to Helbling et al. (2013: 4), immigration policies are statements agreed upon by member states concerning what to do or not do in terms of laws, regulations, decisions or orders relating to non-EU citizens. The Schengen Agreement provides for the temporary reintroduction of border controls where there is a serious threat to public policy or internal security. In this article, harmonisation with the Schengen Agreement (1) will be determined by small states' adherence to Article 26 and 27 of the Schengen Border Code which provides that states cannot unilaterally and at their own discretion reintroduce border controls. A member state must notify other states and the European Commission to justify the reintroduction and wait for the Commission to issue its opinion. "Every state needs to make a reasonable claim regarding the likely impacts of any threats to public policy or internal security, including those posed by organized crime" (European Parliament, 2016: 9). Varying levels of convergence with the established rules and norms will be explained using the theory of policy convergence. Changing elements within the EU system (2) will be traced by analysing the development and responses to the migration crisis. To determine the push and pull factors (3), Thielemann's (2011: 2) reasoning will be applied. Strict border and migration policies will represent push, while more moderate ones will represent pull factors, resulting in the analysed state becoming a transit or destination area (data on asylum-seekers will also be used).[3]

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[3] *The qualitative research conducted by Lucy A. Oloo in 2018, published as a master's thesis, entitled* Dealing with the Refugee Crisis: Border Positioning of EU Member States in Relation to the Schengen Agreement and the Dublin Regulation, *is of particular interest to author. The study examines the distinct*

By applying the two theoretical frameworks and mentioned elements of analysis, the article focuses on the border policies of small Schengen Area member (Slovenia, Austria, Denmark and Sweden) and non-member states (Croatia). All of these countries are categorised as small states by the United Nations, taking 10 million and less as the population cut-off point.

Theoretical framework

The first theoretical concept applied in the paper is policy convergence, defined by Holzinger and Knill (2005: 777) as the "growing similarity of policies over time". This similarity can be evaluated using different indicators like the degree of convergence, scope and direction of convergence (ibid.: 779). Speaking of the degree of convergence, the paper focuses on policy outputs, i.e. the border policies adopted by five governments (agents) reacting to the pressure of problems and legal obligations (ibid.). For EU member states dealing with the migrant crisis, the Schengen Agreement represents a common set of rules requiring harmonisation. The states are legally required to adopt similar policies as part of their obligations as members of international institutions, which according to Drezner (2001: 60) means sacrificing some independence for the good of the community.

Zaiotti (2011: 8) contends that Common external controls were "a logical response to the removal of internal borders and the creation of the internal market". Thielemann and Dewan (2006) think "regional cooperation and harmonization of asylum policies can "be seen as an effort to responsibility-share or responsibility-shift". Brekke and Staver (2018: 2165) perceive it as a responsibility-shifting strategy as the Dublin Regulation entails the obligation to register, process and house new arrivals in the country of first entry. In the case of small states, this brings a dilemma between autonomy and influence, with small states seeking to expand their influence over the great powers through international organisations. However, participation also reduces political autonomy (Goetschel, 1998: 17). According to Wivel (2005: 408), the EU "aggravates this dilemma by increasing the potential costs and benefits of institutionalization". A small EU state facing this integration dilemma surrenders some autonomy and risks entrapment or retains its autonomy and runs the risk of abandonment. Small states should therefore focus their attention on strengthening the EU policy on transnational security problems such as immigration. If successful, this strategy would create a unique platform for small states to coordinate a common effort of member

border positioning of Greece, Croatia, Denmark and Germany as a challenge to the Schengen Agreement and the Dublin Regulation. It served as a starting point for this article which focuses on analysing border policies from the perspective of small EU member states and the implications it holds for small-state studies.

states (ibid.). In this article, the dilemma is between harmonising with the established EU policies (theory of policy convergence) or projecting autonomy by making certain unilateral moves while dealing with migrant flows at the borders and reacting to changes occurring within the system (migration system theory).

The second theoretical approach employed in this paper is migration system theory with its focus on structure, linkage and process (King, 2012: 20). It derives from general systems theory and can be applied to different levels of analysis: from village migration systems (Mabogunje, 1970), the European labour migration system (White and Woods, 1980: 49–55) through to the world systems theory (Wallerstein, 1979). The system approach sees migrations as an interdependent process whereby changes in one part of the system are felt throughout the rest of the system (King, 2012; Mabogunje, 1970). Therefore, systems can be self-feeding, self-regulating or self-modifying (King, 2012: 20). The author believes this causes very different responses to shocks (different border policies), as was demonstrated during the European migration crisis.

Applying Bakewell's reasoning (2014: 310), the migration system presents "a set of interacting elements" such as *flows* of people, ideas and goods; *institutions* and *strategies*. Bakewell's approach became the foundation of migration system theory in the 1990s with its analysis of the dynamic within a migration system. He defines the way "in which the elements (flows, institutions and strategies) change in relation to changes in both these system elements and in the wider environment" (ibid.) Thus, while using system theory the author finds it crucial to consider the ways in which border policy as an element is a product of migration system changes.

First and foremost, the article questions how changes in the system (migration pressure) influenced the policies of individual small member states at their borders. According to Magobunje (1970: 3), one of the main tasks is to identify the basic interacting elements within the system, their attributes and relationships. From there it becomes clear that the system operates in a special environment with which it constitutes a universe of phenomena. The article is particularly interested in how migration challenges at the EU level have influenced the way small states have dealt with migrants on their borders. Namely, during 2015 and 2016 the inability of national systems to keep up with the high migrant numbers resulted in the exceptional reinstatement of controls at the EU internal borders.

Small states will in particular be distinguished according to whether they are transit or destination states (Bakewell, 2014). Whether a state will become a destination for migrants depends on its asylum policy, economic situation and the real/perceived image of the destination country (push and pull factors) (Inter-Agency Regional Analysts Network, 2016: 198). For every

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origin and destination country there is a set of positive and negative factors influencing migration. Aside from push factors in origin countries that cause people to leave their country, such as fear of political persecution, wars, natural disasters or poverty, there are strict immigration and border policies in destination countries which can discourage migrants from coming. On the other hand, people may be attracted to a certain location by pull factors such as peace and safety, greater job opportunities, better education and a better standard of living in general (Segaran and Yahya, 2018: 139). In the article, the pull factors are more generous immigration policies and less strict border policies (Thielemann, 2011: 2).

Schengen Agreement in the middle of the crisis

The idea of a border-free Europe was launched in 1984 at a meeting of the European Commission President and national heads of state and government in Fontainebleau. The core founding states of France, Belgium, Germany, Luxembourg and the Netherlands agreed in 1985 to sign the Schengen Agreement. This led to creation of the Schengen Area that set out to gradually abolish internal border controls (Official Journal of the European Communities, 1985). It was supplemented by the Schengen Convention in 1990, which proposed the complete abolition of systemic border controls and a common visa policy, as well as police and judicial cooperation. EU cooperation on migrations started in 1992 when the Maastricht Treaty brought home affairs into the EU institutional framework, including migration and asylum. However, the Schengen Agreement and related rules were originally envisaged as operating independently of the EU. The Agreement and its implementing Conventions were signed by all EU member states (except Ireland and the United Kingdom) in 1997 and the Schengen *acquis* was incorporated into EU law. Until then, it had been part of intergovernmental cooperation. The Agreement itself brought migration and asylum issues more in line with community decision-making (Parkes and Pauwels, 2017: 12).

According to Zaiotti (2011: 2), the Schengen Agreement "became the symbol of a *sui generis* entity, functioning as a socializing arena. It presented a common space where goods, capitals and individuals could circulate freely". In this article, the Agreement is perceived as a harmonisation tool for member states. The Schengen area's complexity lies in the fact that 22 of the 28 member states fully participate and implement the Schengen *acquis*. Ireland and the UK were provided with opt-outs, while Denmark applies the Schengen *acquis* (however as part of international, not Union, law). Then there are Romania, Bulgaria, Cyprus and Croatia, which do not belong to the Schengen area, but apply some or all of the Schengen *acquis*, and

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must still maintain controls along their internal borders (Pascoau, 2016). As Schengen constitutes the core part of EU law, "all EU member states, which have not joined the Schengen Area, are legally obliged to do so when they meet the criteria".[4]

In 2013, negotiations on the Schengen Governance Package reform started. It all ended with the European Parliament acquiring certain co-decision powers, while the European Commission obtained more scrutiny powers in assessing the member states' "compliance with the Schengen Borders Code (SBC)[5] and the proportionality, necessity and impact of the reintroduction of internal borders" (European Parliament, 2016: 9). Articles 23–29 of the SBC permit the introduction of internal border controls in exceptional circumstances. Under the 2013 reforms, more detailed rules on the criteria and the time limits were required. Article 25 allows "the reintroduction of internal border controls for up to two years" where "serious deficiencies" are detected at the external borders (ibid.). Although more detailed rules on criteria and time limits were introduced, the imposing of border controls cannot be constructed as a unilateral step by member states unless they receive a recommendation from the Council and a proposal from the Commission. Under the pressure of such migration, some small states disobeyed these rules. That the entire Schengen system is a "myth very difficult to maintain" was demonstrated by the European migration crisis 30 years after its launch and almost 20 years since it started opening outwards (Pascoau, 2016: 1–2). The problem with all states introducing border controls was the distinct shortage of details given, as required in Article 26. Although the Schengen Agreement does not completely ban internal border controls, Kiefer (2015: 27–28) notes that an influx of migrants is not an exception found in Article 26.

Need for more union in the Union: response to the migration crisis

The EU worked over three decades to harmonise its asylum and migration laws, with the aim to leave all member states well prepared to absorb migrations. This all finally ended with harmonious common laws and norms being transferred beyond the EU's borders. The 2015 migration crisis confronted member states with issues they had been looking for an escape from in Schengen (Parkes and Pauwels, 2017: 35–36).

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[4] *Accessible at https://ec.europa.eu/home-affairs/what-we-do/policies/borders-and-visas/schengen_en, 1. 1. 2019.*

[5] *The Schengen Borders Code governs the abolition of internal border controls, including the conditions and procedures for their reintroduction, and the uniform control of external borders.*

The crisis also challenged the EU's abilities, from border management to humanitarian assistance. There were obvious tensions between member states wishing for more EU intervention, and those invoking their sovereignty. Instead of the EU acting as a single network of actors, ever more member states started to develop their own crisis-management mechanisms (Collett and Le Coz, 2018: 4–6). Aside from the humanitarian crisis, the policy crisis was manifested with EU and national leaders being unable to agree on a collective answer. Moreover, the EU's institutional and legislative mechanisms proved inadequate for handling the crisis. Even when the EU-Turkey Statement was signed at the European Council meeting in Brussels in March 2016, many thought it represented "another experiment on the part of the EU institutions in operationalizing a response to a complex, multilateral policy challenge" (ibid.: 20).

Many European countries have shown they are not ready to accept migrants into their societies. Several reasons explain this. First, Europe as a community has become less welcoming in past years. Then, EU member states could not agree on common migration policies to help share the burden. With the new redistribution scheme launched in May 2015, requiring a number of asylum-seekers to be distributed fairly across the EU states, the EU showed a willingness to resolve the crisis via joint efforts and a supranational paradigm. It also acted as a sign of solidarity and dialogue with the member states (Brljavac, 2017: 101). However, many EU states were not ready to cooperate for the sake of supranational causes, claiming that participation in the joint plan should be voluntary. The reason for such a stance may be found in the migration crisis becoming politicised and securitised. Another reason is "a complete sense of ignorance of the Western European countries towards the countries which carried the highest burden of migrations" (ibid.) According to Lehne (2016), the EU's institutional and legislative mechanisms were not up to dealing with such a crisis. "There is a possibility either of more Europe, less Europe or a new core of committed member states emerging" (ibid.).

Small states attempted to respond with ad hoc policies when a compromise on a sustainable collective approach by the authorities of the destination counties and the EU could not be reached. These responses included reintroducing border controls and security checks along their national boundaries within the Schengen area. This period was marked by ever more tense bilateral relations not only among the non-EU states in the region, but also among member states. This led to some of them amending relevant legislation and sending the military to the national borders, as well as by building walls and fences, with others yet entering a bilateral trade war and closing border crossings (Knezović and Grošinić, 2017: 13).

In 2015, member states reported over 1.8 million irregular border

crossings along the EU's external borders, namely six times more than in 2014. Aside from member states along the Central Mediterranean Route and those on the Eastern Mediterranean route, the member states along the Western Balkans route were the most affected by these irregular crossings in 2015. The European migration crisis escalated with migrants from the Middle East opening up the Balkan route running through Turkey, Greece, Macedonia, Serbia and Hungary. It all started with Greece and Italy, which were soon overwhelmed by the migration wave, allowing migrants further into Europe without identifying or registering them. In 2016, the EU's external borders continued to withstand great pressure. Although arrivals were significantly lower than in 2015, over 511,000 illegal border crossings were reported (Standard Eurobarometer 85, 2016). After Germany guaranteed to take in 800,000 asylum-seekers and announced its application of the humanitarian clause as part of the Dublin Regulation, some Western Balkan countries were transformed into transit zones (Pascoau, 2016: 3).

The following section analyses the five small states' border policies in reaction to the migration crisis. Three elements will be addressed in particular: (1) distinct border policies in relation to the Schengen Agreement; (2) changing elements within the EU system; and (3) push and pull factors.

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Croatia: protector of the EU's external border?

Croatia, as a country positioned between the Mediterranean, Central Europe and the Balkans, has shown some trends of both immigration and emigration (Knezović and Grošinić, 2017). However, prior to the migrant crisis, its system and policies had never been tested in practice due to the small number of immigrants and asylum-seekers.

Aside from the aftermath of the war in Yugoslavia, Croatia had not been a destination country for migrants. Before 2013, it had around 1,000 persons seeking asylum annually, and these numbers dropped to only a few hundred per year after the accession. Located at an entry point of the Western Balkan route, in 2015 Croatia was faced with hundreds of thousands of people crossing its borders onwards into Western Europe. According to Šelo Šabić and Borić (2016: 17), "no statistically significant number of migrants intended to stay, nor did Croatia want them to stay". It positioned itself as a transit route for migrants, allowing them to proceed into Hungary and Slovenia, stopping them for several hours for registration only (Bakewell, 2014). Croatia was challenged by the need to manage the registration of applicants for international protection. It reported being unable to meet its duties under the Eurodac Regulation related to applicants' fingerprint records. On some occasions, this led to the Dublin Regulation not being applied (EMN Annual Report, 2016: 15). Croatia established a "headquarters

for activities coordination" as a response to the influx of migrants, which ensured the smooth and organised transport of migrants arriving in the country in 2015 (ibid.: 58).

In 2015, it registered just 140 first asylum applicants, making it last among the EU member states, while this figure increased to 2,150 in 2016, or a share of 0.2 percent of the total applications made in the EU (11th place). It had 34 applications in 2015 per 1 million inhabitants (last place in the EU) and 513 in 2016 (18th place). These figures show its position as mainly a transit country, which is in accordance with some of the push factors it demonstrated prior to and during the crisis (letting migrants pass through to other destination countries, low employment rates, general economic situation) (Eurostat, 2016). In addition, according to a survey conducted in 2013 and published by the Centre for Peace Studies (*Representation and Indicators of Discrimination and Xenophobic Attitudes in the Republic of Croatia*), refugees and asylum-seekers were the third-most unwanted group in Croatia[6], which may also serve as a push factor[7]. According to the Eurobarometer survey from November 2016, 70% of Croats supported a common European policy of migration, and only 41% felt very positive regarding the immigration of people from outside the EU (Standard Eurobarometer 86, 2016).

At the outset, Croatia decided to maintain open borders, providing another push factor for migrants not to stay in the country. Between September 2015 and 5 March 2016, around 2 million migrants entered Croatia. After arriving in Greece via the Mediterranean Sea, they continued towards the Republic of North Macedonia and onwards to Serbia, re-entering the Schengen area in Hungary. The border protection policy, affecting the asylum policy, as required by the Dublin Regulation, was suspended. However, after Hungary decided to construct a fence along the Serbian border on 16 September 2015, which resulted in diverting the flows of migrant towards Croatia, the Croatian government closed seven out of eight border points with Serbia. Serbia then closed its border off to Croatian goods. These policies demonstrate small states' reaction to elements changing within the system, according to migration system theory (Gyori, 2016: 41–42). Still, the bans were lifted after several days.

On 16 October 2015, after Hungary had built a fence along its border with Croatia, migrants were redirected to Slovenia (Šelo Šabić and Borić, 2016: 11). These unilateral moves threatened potential unrest in the still turbulent Western Balkans region (between Croatia and Serbia, as well as between Greece and the Republic of North Macedonia). Castells (2008: 88)

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[6] *Accessible at https://www.cms.hr/system/publication/pdf/26/Istrazivacki_izvjestaj_KNJIZNI_BLOK. pdf, 3. 12. 2018.*

[7] *More on public attitudes to migrations in Croatia is available in Luša, Bašić and Rukavina (2017).*

claims governments under pressure did not share the same interpretation of common policies (Gyori, 2016: 41–42). The flip side of the reaction to changes in the system was seen during the winter of 2015 when Western Balkan states coordinated their migration policy and actions in response to Slovenia's request to redirect migrants from non-war-torn countries back to Croatia (Šelo Šabić and Borić, 2016: 4). The Western Balkan states jointly decided to allow transit only to migrants from Syria, Afghanistan and Iraq. This is one example of how a regional compromise and coordination, representing one of a small state's key foreign policy strategies, can be achieved. The route was closed in March 2016.

Prior to becoming an EU member state in July 2013, Croatian laws were harmonised with EU standards and legislation. Croatia joined the European Asylum System that prevents asylum-seekers moving around the EU (via the Dublin Regulation). As an EU member, Croatia is obliged to implement the common EU provisions and measures in this specific field, maintaining autonomy in decisions on the number of immigrants and asylum-seekers accepted (Jurlina and Vidović, 2018). Regardless of all countries in the region having the basic legislation and rules of procedure in place due to their EU accession processes, the migration crisis actively challenged each state's institutional and management capacity. Their efforts to minimise the costs and share the burden in a collective attempt to solve the crisis opened up the possibility for mutual accusations. In a situation where EU member states were unwilling to reach an elementary compromise to ensure a joint EU response to the crisis, small states in the region found it very difficult to cope with this challenge (Knezović and Grošinić, 2017: 12). Croatia's passing of migrants on to other EU states and their improper registration indicated that its border measures were out of step with the Schengen Agreement and the Dublin Regulation, according to the theory of policy convergence.

Slovenia: a small state on the Schengen border

Slovenia was largely focused on the security dimension and organisational issues during the migrant crisis. From 16 October 2015 until the end of the year, Slovenia became a transit country for over 378,000 people. After Austria reintroduced border controls along the Hungarian border on 16 September 2015, Slovenia feared that "a significant part of migration could be directed towards them" (European Parliament, 2016: 108–109). Pressure mounted after Hungary closed its border with Serbia, redirecting the route through Croatia and Slovenia. Both countries feared being forced to accept a disproportional burden (Šelo Šabić and Borić, 2016: 16). Due to the Hungarian border's closure, Slovenia became one of the transit countries for migrants. "It was obvious that the Slovenian government was logistically unprepared to

register and accept migrants, and it did not consider that Croatia would not be willing to accept them if returned" (Vezovnik, 2018: 42).

Then Austria proposed a daily intake of 2,500 asylum applicants, applying pressure to southern small states to take up part of the burden. With individual border crossings and rail traffic being blocked, Croatia started transporting people to various places along the green border to prevent them from staying in its territory. The migrants were crossing the Slovenian border uncontrolled, with 21,000 people entering the country in a single day on 21 October. Between 17 October and the end of November 2015, almost 300,000 migrants entered Slovenia (Bučar and Lovec, 2017: 122–124). Many were stranded there after the Balkan corridor was closed in March 2016, and with increased oversight along the Austrian-Slovenian and German-Austrian borders, which led to a massive increase in the number of asylum applications. However, most applicants left Slovenia before the process had finished. In 2015, Slovenia had 275 first asylum applications, holding 24th place among EU member states, with the figure rising to 1,265 in 2016 (22nd place overall). In 2016, this accounted for 0.1% of all asylum applications in the EU. When looking at the number of applications per 1 million people, Slovenia was 23rd in 2015 and 16th in 2016 among EU members. This shows Slovenia mostly positioned itself as a transit country (Eurostat, 2016).

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According to Vezovnik (2018: 47), there has been "an intensification of stereotyping, xenophobia and discriminatory speech" directed at anything or anyone foreign in Slovenian public discourse since the country's independence. Migrants were described as numerous, a mass arrival a crowd of hundreds, which held the potential to distort the real scale of social problems and trigger feelings of fear. Then "the discourse of a migration crisis cutting deep into Europe and Slovenia, results with a construction of a border culturally differentiating us by them" (ibid.). In September 2015, Prime Minister Miro Cerar stated: "Our actions are based on humanity and solidarity, but also on safety", which demonstrates the positive self-representation of Slovenians. The discourse also included the criminalisation of migrants, being divided into the categories of 'genuine' and those seeing the mass migration as an economic opportunity (ibid.: 48). This transformed migrants into deviants who need to be brought under control. Finally, the construction of migrants as criminals provided a point of departure for securitisation (Bigo, 2002). According to the Eurobarometer survey from November 2016, 69% of Slovenians supported the common European policy on migration, and only 28% felt very positive regarding the immigration of people from outside the EU (Standard Eurobarometer 86, 2016). These results reveal some of the push factors for migrants. As concerns some pull factors, measures to improve attainment in the education system were adopted (EMN Annual Report, 2016: 50).

Slovenia introduced border controls from 17 September to 26 September 2015 and from 27 September to 16 October 2015. In its notification, Slovenia identified the uncontrollable migration flows in the region and its neighbours introducing border controls as a threat to its national security (EMN Annual Report, 2016). Prime Minister Cerar made it clear: "Slovenia is the guardian of the border, and not only of Slovenian border. It is committed to protecting the Schengen border. It is also the guardian of the European border" (Vezovnik, 2018: 49).

Yet the procedures adopted could not work in practice because Croatia was unwilling to readmit migrants who had illegally crossed the Slovenian-Croatian border. Slovenia then "introduced a parallel regime, setting up a corridor of basic reception areas, registration procedures and the transfer of migrants to the Austrian border" (ibid.: 42). During that process, Slovenia called for all member states to ensure the appropriate level of border control in line with Schengen standards. Slovenia reintroduced border controls at its border with Hungary from 17 October until 16 November 2015. Unable to cope with the mass inflows and aiming to protect the Schengen border, Slovenia amended its Defence Act on 21 October 2015, allowing armed forces to engage in protection of the state border. Moreover, it started installing razor wire alongside its border with Croatia on 11 November 2015. Namely, Slovenia as a Schengen member state, had appealed for the application of border control rules, especially in the case of neighbouring Croatia (Šelo Šabić and Borić, 2016: 15–16). All of the above constitutes a reaction to changes within the EU system, particularly to policies conducted by other member states.

These actions were taken after it became obvious the agreement negotiated by leaders of the Western Balkans in a summit held in Brussels on 25 October 2015 had failed to work. Further, the European Union's aid regarding the migrant situation had been insufficient (Vezovnik, 2018: 42). The situation culminated in Prime Minister Cerar drastically announcing on 25 October that "if we don't find a solution today, if we don't do everything today, then this is the end of the EU as such" (Šelo Šabić and Borić, 2016: 17).

Austria and Germany, as the primary destination states, insisted on full implementation of the Schengen provisions along the external border (the border between Slovenia and Croatia). This request was quite challenging with that border representing almost half of all land borders of the country, thus requiring additional police and military forces. Being unable to respond to such an immense inflow, Slovenia closed the border with a fence in most sectors (Zupančič, 2016: 115). Due to the modest control of arrivals, which necessitated a detailed check, records of documents and security checks, in the spring of 2016 Austria decided to re-establish physical police and military surveillance on its border with Slovenia and Hungary (ibid.: 116).

Regarding border controls, Slovenia "was in and out very quickly, although it did not examine too carefully the requirements as regards the grounds for reintroduction of border controls" (European Parliament, 2016: 43). Its justifications amount to "bare assertions without any evidence" (ibid.), which makes the border measures implemented partly out of line with the Schengen Agreement.

Austria: a small transit and destination state

Austria was hit by the migration crisis at the end of August 2015. It shifted from being a transit country to a destination country after the end of the Cold War and in anticipation of the country's accession to the EU and the Schengen Area. At the outset of the crisis, it served as a transit country to Germany or other member states, partly due to the length of the asylum application procedure. It faced a lack of reception capacity, which led to the establishment of emergency reception structures in 2015 (EMN Annual Report, 2016: 15).

One of the causes of the vast inflows was Hungary's decision to suspend the Dublin II Regulation and allow migrants on their onward journey. The Austrian Interior Minister personally welcomed migrants at the central train station, assuring them of the country's support and their safe onward travel. Austrian public discourse was explicitly distanced from Hungary's decisions. They criticised Orban's "politics of waving through" and the erection of the border fence on the Hungarian-Serbian border. The cooperation with German Chancellor Merkel was enforced and allowed the Austrian government to reactivate the narrative of mainly being a transit country. Germany and Austria coordinated and signalled safe passage for refugees into Western Europe, with Germany as the primary destination (Gruber, 2017: 48). This shows a small state's policy of alignment with a bigger neighbouring country in an attempt to find a common solution to a crisis, sharing resources and expertise.

The open-door policy has been a pull factor for migrants. In 2016, Austria took measures to improve attainment in the education system, enhance migrants' language skills, promote labour market integration while also adopting legislation pertaining to anti-discrimination. However, only 35% of Austrians felt positively towards the immigration of people from outside the EU in the spring of 2016, while 59% supported the common European policy on migration (EMN Annual Report, 2016: 16). The initially welcoming attitude began to change upon the erection a border fence on the southern border with Hungary in September and October 2015. After Germany decided to introduce border controls along its Austrian border and shut down train services in mid-September 2015, tensions within the Austrian

government coalition increased. The ÖVP (Austrian People's Party) forced the Chancellor to place a border control mission on Austria's eastern border with Hungary (Gruber, 2017: 48), envisaging border controls to be possible at any time at all land and air border crossing points (EMN Annual Report, 2016: 56). It shifted the migrant transit route towards the border between Austria and Slovenia. Despite having a history of being a bridgehead for migratory flows into Western Europe, the growing inflow of migrants led to disparate political reactions of its Austrian Grand Coalition government, as well as by civil society. By the end of 2015, Austria's initial welcoming approach had turned into a closed border approach (Gruber, 2017: 39). It received 85,505 first asylum applicants in 2015, occupying 4th place in the EU, and 39,860 in 2016 (5th position). In total, this amounted to 6.8% of all first asylum applications in the EU in 2015. In terms of the number of applicants per 1 million people, Austria held 3rd place in 2015 and 2nd in 2016, which clearly shows its role as a destination country (Eurostat, 2016). Yet, taking all the numbers into account, one may conclude that Austria was both a transit and a destination country during the European migration crisis, with the number of asylum claims ranging from 300 to 400 a day (Hettyey, 2017: 94). In 2016, Austria established a ceiling of 1.5 percent of the population for the number of asylum-seekers to be admitted into the procedure (EMN Annual Report, 2016: 2) Growing scepticism in public opinion and critical coverage by tabloid media influenced a more restrictive approach vis-à-vis asylum-seekers and neighbouring countries in order "not to overstrain" the population, which also served as a push factor.

The shifting of the migration route from Hungary to Croatia and Slovenia in October 2015 saw Austrian change its focus to its southern border. Germany temporarily decided to process refugees at the Austrian border in blocks, producing a tailback of refugees at the Austro-Slovenian border and the remaining countries along the Balkan route. Soon ÖVP demanded "an end of the welcoming policy" (Gruber, 2017: 49). While examining the southern border, Interior Minister Johanna Mikl-Leitner stated that "we have to build a Fortress Europe" (Rheindorf and Wodak, 2018: 25). This was followed by Austria erecting physical obstacles along the border with Slovenia on 27 November 2015. Its open-door policy pursued up until the end of 2015 had been unsuccessful because it signalled that refugees might come and be taken care of, acting as one of the pull factors (Hettyey, 2017: 96–97).

Austria set a symbolic precedent for the Schengen area by re-establishing the very first fortified border, separating two countries within the Schengen area (Gruber, 2017: 49). In January 2016, it relaunched a tougher asylum strategy, which symbolised its push factor. The border control mission with countries on the Balkan route was organised. Then Germany started to tighten border controls with people sent back to Austria, reaching up to

200 per day. This about-turn in Germany had a dramatic impact for Austria by sparking fears that a great number of migrants aiming for Germany and Sweden would become stuck in its territory (Hettyey, 2017: 92). Simultaneously, at the start of 2016 Austria and Germany declared that only those migrants seeking asylum in Austria and Germany would be allowed entry (Šelo Šabić and Borić, 2016: 4). This all shows how changes within the system affected Austria's border policies, according to migration system theory.

Austria reinstated border controls from 16 September 2015 to 16 March 2016, justifying the policy with the massive migration flows to and through the country. Austria's notification of border control reintroduction was based on the German one, without any specific references to public order and international security (EMN Annual Report, 2016). It mostly based its claims on border controls benefitting Austrian citizens. In September 2015, the main reason was the reintroduction of border controls by Germany, continuous overburdening of the police, emergency services, as well as public infrastructure. In its notification from October 2015, Austria warned about security deficits in the Schengen Area, which was addressed again in March 2016, proclaiming serious flaws in the external border control with Greece (ibid.). Austria clearly claimed that its willingness to help should not be overstretched and that it was not responsible for the vast majority of persons concerned. At the same time, it pled for common actions and for controlling the influx of people in an orderly manner. Measures taken at the border were interpreted as the only way to avoid security deficits in the Schengen Area in the interest of all citizens. Austria's claim that "border controls within the Schengen area are of benefit for EU citizens presents inversion of the obligation in Article 26 SBC to assess the impact of the controls on free movement of persons" (European Parliament, 2016: 43). According to the theory of policy convergence, this shows the lack of harmonisation with the existing EU regulation.

Austria hosted the Western Balkans conference in February 2016 where it took the lead in advancing the shut-down, although it was criticised by Brussels, Berlin and Athens. Within a 4-month period, "the Austrian government shifted from a Merkel-like course to an Orban-like course" (Gruber, 2017: 50). Here, aside from the previous strategy of alignment with a much more powerful neighbour, the strategy of a network leader was on display.

In April 2016, the Austrian parliament adopted "one of Europe's toughest asylum laws allowing the government to declare a state of emergency" if numbers suddenly rise, and to reject most asylum-seekers at the border (Hettyey, 2017: 92). "Refugees were not welcome any more – only at limited number, for a limited period, at a limited cost and under the premise of unequivocal integration" (Gruber, 2017: 51). By demonstrating individual

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measures, this small state condemned the EU's functioning (Hettvey, 2017: 96–7) and challenged the Schengen Agreement.

Denmark's civic selection approach

In 2015, an increasing number of migrants and asylum-seekers reached Northern Europe, crossing the borders of Denmark and Sweden. These migrants caused administrative challenges and political debates on national security, cultural differences and integration. They were perceived as a burden triggering a state of emergency. Both governments reacted with policy regulation focused on limiting the numbers of new entries. The decision by the Swedish Government in November 2015 to implement border controls influenced both Swedish and Danish asylum and migration policies. The move was supposed to increase the number of asylum-seekers in Denmark (Jayananthan and Kryger Pedersen, 2018).

EU countries in the north have sought to use the Dublin system at the expense of the southern states. However, this has been obstructed by the failures of asylum systems in the south (Open Society Foundation, 2018). The two countries represent two different approaches to immigration and two different ideas of national identity. The Swedish one is exceptional, yet faced with "the civic turn", while the Danish one goes hand in hand with the civic selection approach (Bech et al., 2017: 20). The overall situation with migrants is described as the "refugee chaos in Denmark" and as the "refugee crisis in Sweden" (Jayananthan and Kryger Pedersen, 2018: 3). Their policies clearly show the dynamic of chaining elements within the migration system whereby the moves of one actor influence the moves of others, regardless of common EU policies. Thousands of migrants crossed the Danish border and wandered around on their way to Norway and Sweden (ibid.: 2). The Danish Government described Europe as being paralysed after an unprecedented number of people had crossed its external borders and continued northwards. They took responsibility by introducing stricter measures in the asylum field as well as by introducing border controls. These measures served as push factors. As mentioned, Denmark applies the Schengen *acquis* but as part of international, not Union, law.

In 2015, Denmark was faced with 20,825 first-time asylum applicants (11th in the EU) and 6,055 in 2016 (12th place). It held a 1.7% share of the total number of applications at the EU level in 2015. Denmark occupied 8th place in 2015 and 14th in 2016, when it came to the number of asylum applicants per 1 million inhabitants (Eurostat, 2016). In the spring of 2016, 62% of Danes supported the common European policy on migrations, while only 30% supported the immigration of people from outside the EU (EMN Annual Report, 2016).

Danish politicians were generally focused on the situation in Denmark, their internal cohesion and the stress that newcomers may add to Danish society in terms of labour (Shierup and lund, 2011; Bech et al., 2017). Their policies claimed to emphasise welfare over humanitarianism. Denmark had the goal of reducing the number of asylum-seekers and making the country less attractive to new arrivals, which shows push factors being used to strengthen Denmark's position mostly as a transit country. The civic selection as an approach to immigration means that only people who "fit the Danish egalitarian way of life and those who seem to have potential to be able to contribute to Danish society should be allowed in" (Bech et al., 2017: 20). The Danish government constructed a narrative centred around Denmark and Danes that communicates a feeling of unity and bond based on national identity. Danish policy documents indicate that the security and cohesion of Danish society take priority over accepting people seeking refuge or cooperation with other EU states to find a common solution to the crisis. Government solutions took the form of alterations to the Danish asylum and migration policies aimed at maintaining control of new entries and preventing a high influx of newcomers (Jayanathan and Kyger Pedersen, 2018: 47–48). This was done "to send out signals that people should think twice before choosing Denmark as a destination country" (Oloo, 2018: 47).

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The Danish Liberal minority government has introduced several policy changes since September 2015. A new and lower integration benefit replaced social assistance for those who have not been in Denmark for more than seven or eight years. Then in November, the Government came up with a 34-proposal asylum package, one-third of which was adopted. Among other things, it allows for the easier return of rejected asylum-seekers (Kvist, 2016). In January 2016, the parliamentary majority adopted the second part of the asylum package encompassing rules on the confiscation of valuables, family reunification and shorter residence permits. These new rules attracted a lot of international criticism (ibid.). The tightening of the asylum and migration rules may be considered a way of a small state safeguarding itself against potential threats that could occur or are seen occurring in other countries. The Danish Prime Minister stated that "Denmark should not undergo the same uncontrollable pressure that has brought Germany to its knees and made the Swedish government desperately appeal for international help" (Jayananthan and Kyger Pedersen, 2018: 62).

During the 2015 migration crisis, Denmark imitated Hungary by allowing migrants to head north unchecked and freely through its territory towards Sweden (Alkopher and Blanc, 2017). This move damaged the relations of trust between Sweden and Denmark and is best explained by the migration system theory. After Sweden implemented border controls, Denmark followed the pattern by establishing strict policies to discourage the entry of

refugees into the country. Several different measures were implemented, from spot checks of passport identification, blocking the country's major highways with Germany, to parliament passing several policies strengthening its existing laws on border control (European Parliament, 2016). With the measures adopted in January 2016, Denmark became the last Nordic country to "tighten entry access" and extended the controls on its border with Germany twice (Kvist, 2016). Denmark introduced border measures from 1 April to 12 November 2016, with a short interruption between 2 and 20 June. Its border strategy is determined by its role as both a transit and a destination country. "Denmark's public security threat appears to be that people might not move on as quickly as the Danish authorities would like because its neighbours have imposed carrier sanctions requiring travel companies to check ID documents" (European Parliament, 2016). Nordic countries have revealed their specificities regarding the public security threat, without providing evidence to meet the simple criterion of Article 26 SBC (ibid.).

Thielemann (2003: 11) claims the Danish government did not allow policy harmonisation to deter its ability to apply distinct national policies. Demark is perceived as the European country that implemented the "most civic integration policies" and adopted some of the most strict, complex and demanding migration policies (Borevi, 2014: 716). It suspended the Dublin Regulation for certain refugees, effectively helping to reduce their number.

Sweden and the civic turn

According to Eurostat 2016 data, Sweden was the largest European refugee recipient state per capita in 2015. Its attractiveness as a destination country, apart from a liberal migration policy, was due to its generous refugee support system (Herolf, 2016: 39). It has been one of the European countries to have openly welcomed refugees. In 1997, a new integration policy was agreed in Riksdag based on the government bill "Sweden, the future and diversity – from immigration politics to integration politics" (Brljavac, 2017: 96). The Swedish integration model displayed equal rights, obligations and opportunities for all, regardless of their ethnic, religious or cultural background. Sweden has also viewed migrants as "a valuable economic asset that can contribute to its economic progress" (ibid.: 98). It introduced measures to improve education system attainment, increase healthcare capacity as well as new integration plans and strategies in view of supporting the civic participation of third-country nationals, "fast tracks for newly arrived refugees to find jobs in shortage occupations as well as adopted legislation pertaining to anti-discrimination" (European Parliament, 2016: 52–56).

The war in Syria means immigration to Sweden has grown, with the result

confirming Sweden as a destination country. However, on a smaller scale, it also represents a transit country to Norway and Finland (Herolf, 2016: 41). In 2015, Sweden counted 156,110 first-time asylum applicants, taking third place in the European Union. Its share of total EU applicants was 12.4%. During the same year, Sweden was the 2nd EU state in terms of the number of asylum applicants per 1 million inhabitants (out of all asylum applications in 2016, 60% were granted (Eurostat, 2016)). Yet, the vast inflow of people placed Swedish society under serious stress, with problems related to their reception at railway stations, identity checks, the protection of accommodation centres, the lack of identification papers etc. Moreover, the costs of receiving asylum-seekers were enormous (Herolf, 2016: 47–50).

According to the Eurobarometer survey from May 2016, 60% of Swedes agreed their country should help refugees, while the second-highest score in the EU was registered in Denmark with 39% (Standard Eurobarometer 85, 2016). However, during 2016, there was quite a lively discussion in Sweden on cultural differences (Herolf, 2016: 2). Swedish newspapers and policy documents emphasised the importance of cooperation and solidarity within the EU in order to solve the crisis (Parusel, 2016: 11–12). Other EU member states were criticised, particularly Denmark with its asylum policy being described as "Danish deterrence" (Jayananthan and Kyger Pedersen, 2018: 64). Immigration from outside the EU was supported by 62% of Swedes, while 75% were in favour of the common European policy on migration.

Several authors have identified a shift in Swedish political rhetoric and policies on asylum and migration (Shierup et al., 2014; Dahlgren, 2016; Bech et al., 2017). On 8 September 2015, the Swedish Government presented a policy for reforming the EU refugee system that, among other things, envisaged establishing permanent redistribution mechanisms in the event of disasters, taking responsibility to maintain the EU's external borders and asylum rules, increasing the quota for refugees and more active foreign aid policy to help people on the ground (Herolf, 2016: 53–54). On the regional level, Nordic foreign ministers filed a complaint in September 2016 with the European Commission concerning Hungary and its refusal to accept asylum-seekers from other EU countries. This was in violation of the Dublin Regulation and ended with 1,000 refugees that Sweden wanted to send back to Hungary in 2016 (ibid.: 55).

The Social Democrat and Green coalition government made an agreement on migration and integration with the Moderate Party, the Christian Democrats, the Liberal Party, and the Centre Party in October 2015. Part of the agreement referred to the relocation of migrants, calling for all countries to take responsibility and help those fleeing. "It is important for European solidarity that all countries participate and through this system all countries will build up a reception system and improve their asylum processes" (Sager

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and Öberg, 2017: 2). Germany and Sweden criticised other EU members' unwillingness to share the burden of the migrant challenge. The criticism was mainly directed at certain Central and Eastern European governments for their selfish approach to the EU migrant crisis (Brljavac, 2017: 97).

Sweden introduced border controls from 12 November 2015 to 9 January 2016, from 10 January to 8 April 2016, from 9 April to 8 May 2016, and from 9 May to 7 June 2016. A reason given for reintroducing border measures was the "extreme challenges to the functionality of the Swedish society, one of the three goals of Swedish security", with a need to identify different categories of persons entering the country at the borders (European Parliament, 2016). By introducing identity checks for all travellers crossing the Oresund Bridge, Sweden revealed itself as a small member state unilaterally engaging in self-protection by threatening to suspend its obligations within the system (Alkopher and Blanc, 2017). Its claims were not in harmony with Article 26 of the SBC.

After the Swedish Government implemented temporary border controls for all public transportation to Sweden and aligned its asylum policies with the minimum levels required by EU legislation, it reached a turning point and took a step towards an anti-immigration policy (Dahlgren, 2016: 385–386). On 21 June 2016, the Riksdag adopted a set of laws which changed the rules for asylum-seekers and entered into force on 20 July 2016, with its application intended to last for 3 years. With the vast number of migrants arriving, it was quite impossible to determine whether they were coming to seek asylum, continue their journey on to Finland or Norway or disappear (Herolf, 2016: 42). The Swedish model of exceptionalism (protection and equality of all citizens and new immigrants) was challenged by a civic turn (Shierup and lund, 2011; Borevi, 2014; Bech et al., 2017). The new approach "makes rights a reward that people receive after fulfilling their goals" (ibid.). In other words, the newcomers must earn their rights.

The recent Swedish policies follow trends in other small EU member states regarding their handling of new arrivals and prioritising the economic situation over moral values (Dahlgren, 2016: 386). This shift may be explained by migration system theory where changes in one part of the system reflect changes in other parts. Sweden as a small state with limited resources was unwilling to take on the burden of the entire system by itself and was reacting to the policies of other EU states, particularly Denmark.

Conclusion

During the European migration crisis which culminated in huge inflows in 2015 and 2016, several small EU states were either entry points (e.g. Malta), transit (Croatia, Slovenia, Austria, Denmark) or final destinations for

migrants (Denmark, Austria, Sweden). Excluding the origin countries from the analysis, the article discussed the changing migration trends and figures in small states affected by the crisis, resulting in new border policies. According to Collett and Le Coz (2018, 6), the EU's response to the migration crisis may be perceived based on two models: acting as a lead-agency or as a network. The analysis mostly focused on the latter one, referring to "a more complex interaction of different national and EU actors with a less defined chain of command". The aim was to show how small states acted as elements within a system impacted by crisis. By using two theoretical frameworks, migration system theory and the theory of policy convergence, the author questioned (1) different border policies in relation to the system, (2) their convergence with the Schengen Agreement, as well as (3) the difference between transit and destination small states, by identifying push and pull factors. Further, (4) the small states' foreign policy strategies were addressed (particularly the integration dilemma between more autonomy vs. the institutional solution).

(1) At the start of the crisis in 2015, a higher level of activity in support of collective action was displayed, promoted by the Commission, the Council and some states such as Sweden and Germany, which accepted an agenda based on cooperation and humanism (Rasten et al., 2015: 25). Other states deepened the political fault lines in the EU with their reactions. Despite attempts by EU institutions to promote a common solution through the relocation mechanism, Hungary, Slovakia and Austria introduced border controls. Soon Germany and Sweden, the most prominent supporters of the collective EU action, did the same (Rasten et al., 2015: 25). This shows how elements within the system are linked, with an unparalleled flood of migrants causing a domino effect in the form of individual solutions. Croatia as a small state representing part of the external EU border was initially allowing migrants to proceed onwards into Western Europe. However, when Hungary decided to close its border and make changes within the system, Croatia followed the pattern. It closed seven out of eight border crossings with Serbia (Gyori, 2016: 42). The same goes for Slovenia, which introduced border controls after its neighbours had done the same (especially after Austria reintroduced border controls with Hungary, and after Hungary closed its borders with Serbia). Austria's initial welcoming approach turned into a closed border approach after the migrant route was shifted from Hungary to Croatia and Slovenia. Two different approaches to migrations were on display in Denmark and Sweden, clearly showing the dynamic of changing elements within the system. Denmark came up with the most strict and complex migration policies, while faced with unparalleled inflows Sweden decided to introduce several restrictive policy changes, criticising the lack of solidarity and responsibility shown by other member states. The

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analysis reveals the importance of timing and the action-reaction pattern of small states when creating different border policies.

(2) The analysed small states' policies were partly out of step with the existing EU regulations due to the heavy burden placed on them and the lack of resources and capacity to accommodate the applicants and meet all their requirements. The crisis has led to "the de facto dismantling of Schengen visa-free travel in parts of the EU, fencing and policing the borders" (Inter-Agency Regional Analysts Network, 2016: 21). However, there was a distinct shortage of details concerning the reasons for reintroducing border controls given by every single state used as a case study in this paper. As Schengen Border Code provides: "Migration and the crossing of external borders by a large number of third-country nationals should not, per se, be considered to be a threat to public policy or internal security" (ibid.) The Schengen Border Code does not completely prohibit controls but provides for their temporary reintroduction. A state can reintroduce border control on an exceptional basis without prior consultation but needs to justify the measure. Many consider that an influx of migrants does not fall within the exceptions defined in Article 26 of the SBC (Kiefer, 2015: 27).

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(3) According to Bakewell (2014), the way the element operates in the system relates to its location within the system. In the case of the small EU member states analysed in the paper, a significant difference in implementing border policies was noticed depending on whether they were transit or destination states, and on the region they belong to. Particular push and pull factors were addressed as positive or negative factors influencing migration. Segaran and Yahya (2018: 139) believe push factors are manifested through strict immigration and border policies, which can push migrants away. On the other hand, people are attracted to a certain location by pull factors like peace and safety, greater job opportunities, better education or a better standard of living in general (ibid.). The analysed small states were placed in the categories of transit (Croatia, Slovenia, Austria and to some extent Denmark) and destination states (Austria, Denmark, Sweden) after taking account of the number of first asylum applications, as well as different push and pull factors.

(4) The Schengen area is perceived as "one of the most ambitious realizations of the EU. It suppressed internal border control and created tools to maintain security through law enforcement cooperation" (Kiefer, 2015: 26). However, after 20 years of harmonising and developing the Common European Asylum System (CEAS) and the emerging European norms and regulations on immigration controls, the migrant management crisis happened. It created tensions between national and supranational interests and control over the European agenda (Brekke and Staver, 2018: 2164). Certain small member states' deliberate "non-use" of Europe "has been an equally

important strategy to reduce migratory pressure and maximize national leeway" (Slominski, and Trauner, 2018: 101). The escalation of the migration crisis reveals the lack of coordination and cooperation between EU member states, as well as tensions between national and supranational interests and control over the European agenda (Brekke and Staver, 2018: 2164). The crisis of universalism was clearly shown with the Leviathan of national sovereignty emerging through the unilateral response by small member states. According to migration system theory, any change within the migration system influences how small EU states design their border policies as interacting elements. The lack of a uniform solution visible in the reform of the Common European Asylum System (CEAS) remaining half completed, the Dublin Regulation needing further changes and with the lack of responsibility-sharing, led, according to Lehne (2016), to individualised small state actions.

All of the analysed small states' reactions to the migrant crisis have put pressure on the Schengen Agreement by showing their border policies lack convergence with EU immigration policies and cooperation. Croatia announced it would maintain strict daily quotas of migrants crossing, migrants passed on to other states, and improperly registered them. Slovenia erected a razor-wire fence on the border with Croatia, deployed the army to assist the police at the border and applied daily quotas. Aside from building a fence along its border with Slovenia, Austria reinstated border controls, set a daily quota of asylum-seekers and allowed migrants to travel unimpeded from Hungary to Germany. Denmark reintroduced border controls and suspended all rail and ferry links with Germany, allowing migrants wishing to continue on to other Nordic states to pass. Sweden followed the same pattern and implemented a mandatory train exchange for travellers between Copenhagen and Sweden. The author contends that the different positions held by the analysed small states within the EU and the Schengen system, the changes to the system triggered by migration as well as external influences which defined them as migrant destination or transition countries impacted their border policies during the crisis.

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