

The Impact of Brexit on Central and Eastern European Security

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Abstract: *This article examines the impact of the Brexit process on security policy and related political discourse in Central and Eastern Europe. Developments related to the Brexit process are considered in its two-fold dimensions: direct impact, on the European Union, and indirect effect, on UK's contribution to NATO. In this context, the article proposes a qualitative analysis of foreign policy and security national strategy documents, official statements, media articles, public information sources, as well as commentaries, op-eds and positions of think tanks in the region. The aim is to reflect the perspectives associated to the Brexit process in Central and Eastern European countries, as captured in official and independent documents and positions. The article investigates conditions for the emergence of a new post-Brexit special relationship between the UK and the EU in the foreign and security field. Nuances between security policy discourses among different countries in Central and Eastern Europe reflect their various foreign policy orientations, preferences and commitments to the European security project. Opinions reflect that the UK's influence on the European security agenda is likely to remain considerable, given its international standing, NATO role as well as recent security developments on its own territory.*

Keywords: *Brexit, Central and Eastern Europe, security, discourse, European Union, NATO*

1. Introduction: The Brexit process. Relevance for the European foreign and security policy

The article argues that security and defence cooperation is likely to remain fairly similar post-Brexit, based on the statements presented in the UK government's Policy paper "Foreign

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policy, defence and development: a future partnership paper”². This paper demands reflection on various options for foreign policy, defence and development collaboration. The document acknowledges UK’s major role in providing European security and defence throughout time and that NATO will remain the cornerstone of the country’s defence. It pinpoints London’s desire to develop a “deep and special partnership with the EU that goes beyond existing third country arrangements”³.

Under Article 50(3) of the TEU, “the legal consequence of a withdrawal from the EU is the end of the application the Treaties and Protocols thereto in the state concerned from the point on. EU law ceases to apply in the state concerned, although any national acts adopted in implementation or transposition of the EU law would remain valid until the national authorities decide to amend or repeal them.”⁴

The article focuses on the perceptions in Central and Eastern Europe as regards the direct effect of the Brexit referendum of June 2016 and its aftermath at the level of concrete decisions in Central and Eastern Europe as regards security and defence policy. The paper’s thesis is that Brexit is expected by most officials and analysts in Central and Eastern Europe to not change in a substantial manner the EU’s balance of power.

Some British experts consider that UK influence on European security will remain considerable, given its position as NATO’s most capable and willing European security actor. Chalmers believes⁵ that the UK should aim to create a new post-Brexit special relationship between the UK and the EU on foreign and security policy, allowing joint initiatives and action on topics of common concern. EU foreign policy is increasingly a matter for joint action by the Commission and Council, often brought together with the European External Action Service and involving complex negotiations of common positions resorting to a wide range of capabilities, such as energy, environment and sanctions.

Core arguments for the relevance of the Brexit for European foreign and security policy regard the realization of the fact that there is more to the relationship with London than trade, budget and migration issues. Following completion of the Brexit, the two parties are likely to continue to “share fundamental interests and values”, with the UK acting as a reliable partner in the defence and security area. On the other hand, Brexit may be regarded as an opportunity for the UK to use the new freedoms created by the process and resort to additional national controls, with the EU acting as a buffer against unwanted migration from Europe’s south and east⁶.

Britain is the EU’s top military power, given its sizable diplomatic network, military,

² Policy Paper, “*Foreign policy, defence and development – a future partnership development*”, 12 September 2017, Department for Exiting the European Union, accessed 30 December 2017, available at: <https://www.gov.uk/government/publications/foreign-policy-defence-and-development-a-future-partnership-paper>.

³ Policy Paper, “*Foreign policy, defence and development – a future partnership development*”, p. 2.

⁴ Eva-Maria Poptcheva, “Article 50 TEU: Withdrawal of Member State from the EU”, Briefing, February 2016, *European Parliament Research Service*, PE 577.971, accessed 10 March 2017, available at: [http://www.europarl.europa.eu/RegData/etudes/BRIE/2016/577971/EPRS_BRI\(2016\)577971_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2016/577971/EPRS_BRI(2016)577971_EN.pdf).

⁵ Malcolm Chalmers, “*UK Foreign and Security Policy after Brexit*”, Royal United Services Institute, Briefing Paper, January 2017.

⁶ Malcolm Chalmers, “*UK Foreign and Security Policy after Brexit*”, Royal United Services Institute, Briefing Paper, January 2017.

intelligence capabilities and soft power. Britain's departure from the EU will put a greater weight on bilateral relations with its former partners. By detaching from the EU's institutional network, London risks drifting apart from European neighbours. Britain and France are the only two European states with genuine global interests and engagements. Given the weight of the UK and France in forging the European security policy, the two have a particular interest in achieving an EU-UK strategic partnership providing continuity on mutually significant initiatives, including law enforcement and criminal justice. Given the Brexit scenario, Britain would continue to contribute to costs associated to border control at Calais as well as assist with humanitarian issues and traffic management⁷.

Following Brexit, London's best options include strengthened foreign policy partnerships with France in the UN Security Council, in NATO and in small-group diplomacy formats. Defence cooperation is the field where Britain and France share significant similarities. Both are nuclear weapon states, with important defence budgets, sizable armed forces and capabilities as well as solid tradition in international security⁸.

As a major economic actor, the UK can still contribute significantly to the non-military dimension of crisis management and stabilisation. Once the UK leaves the EU, it may become more difficult for the UK to translate an important commitment into political influence. After Brexit, the UK will no longer be a member of the Common Security and Defence Policy (CSDP) but, given its capabilities and interests, it may be asked to contribute to future EU missions on an ad hoc basis. This dimension is correlated by most experts exploring the issue with the future foreign policy interests London may develop in the context of the process as well as a result of it⁹.

The UK's position within the NATO command structure could be impacted by leaving the EU. Given recent debates on the possibility that the position of Deputy Supreme Allied Commander (DSACEUR), held by the UK since 1951, might be transferred to a NATO member that is also an EU member. This position is key to ensuring the availability of NATO assets to some EU missions organized under the 'Berlin Plus' arrangements¹⁰. The fact that such a possibility is under consideration reveals that the UK's role within NATO cannot be fully protected from the consequences of Brexit.

2. Research questions

The theoretical framework of the article is designed around the following research questions:

- a) Is the Brexit process relevant for Central and Eastern European security? (If yes), why is it so?
- b) What are the main topics related to the Brexit process which are relevant for Central and Eastern European security?

⁷ Peter Ricketts, "National Security Relations with France after Brexit", Briefing Paper, RUSI, January 2018, p. 2,

⁸ Peter Ricketts, op. cit., p. 5.

⁹ Malcolm Chalmers, "UK Foreign and Security Policy after Brexit", Royal United Services Institute, Briefing Paper, January 2017, p. 6.

¹⁰ Malcolm Chalmers, op. cit., p. 6.

c) How are topics related to the Brexit and European foreign and security policy covered in the British and Central and Eastern media and policy-making environments?

The investigative method proposed consists in a qualitative analysis of foreign policy and security strategy documents, media articles, public information sources, as well as commentaries, op-eds and positions of think tanks covering issues such as European foreign and security policy, policy-making procedures, institutions and trends in this field and political and security developments related to dynamics of the European integration process. These developments are analysed from the perspective of their relationship and impact on the foreign and security policy of the countries in Central and Eastern Europe. A major argument for exploring Brexit from the perspective of Central and Eastern Europe is the geographical and geopolitical one, given its immediate proximity to the continent's Eastern neighbourhood. Most of the Eastern partner states are marked by constant political and economic struggle and turmoil, as some of them are trying to nestle relations with both the EU, under the framework of association agreements, and Russia.

In Europe's East, Russia has been regaining increased influence in relation to former Soviet states, with important economic and security implications for these countries and relations with the West. Addressing this has raised challenges for the EU in finding a minimum common denominator as regards a policy towards Moscow adapted to the current context. This has manifested not only in different levels of involvement with third parties, such as the US, but also as regards maintaining a common front on the issue of economic and financial sanctions imposed on Russia.

The United Kingdom's exit from the EU is however not likely to lead to significant changes in its relation to the neighbourhood, as most experts investigating the topic agree that its commitment to European security will continue. Recent coordinated announcements of new deployments of Typhoon aircraft to Romania, army personnel to Poland and an infantry battalion of 800 staff to Estonia reflect the UK's commitment to European defence. Of the four 'enhanced presence' battalions deployed in Eastern Europe as a result of NATO's Warsaw summit, three will be led after Brexit by non-EU states: battalions present in Latvia, Lithuania and Poland will be run by Canada, the UK and the US and only one will be led by an EU member, that is Germany¹¹.

The UK's 2015 Strategic Defence and Security Review (SDSR) and the EU's 2016 Global Strategy identify a set of shared challenges and priorities, which serve to guarantee continued cooperation between London and Brussels in the foreign and security policy realm. The key challenges faced by Europe are related to perspectives of political integration, the relationship between solidarity and austerity and external factors which impact all these dimensions, with migration from Southern Europe at the top of the agenda¹².

The security policy represents a distinct topic in the framework of the Brexit discussion. In 2017, the UK called for a treaty on post-Brexit security cooperation with the EU. Theresa

¹¹ Malcolm Chalmers, "UK Foreign and Security Policy after Brexit", Royal United Services Institute, Briefing Paper, January 2017, p. 6.

¹² "Shared Vision, Common Action: A Stronger Europe – A Global Strategy for the European Union's Foreign and Security Policy", *European Union External Action*, June 2016, accessed 11 March 2018, available at: http://www.eeas.europa.eu/archives/docs/top_stories/pdf/eugs_review_web.pdf.

May is set to show flexibility around the UK's red lines to reach a new security treaty once the UK leaves the EU's foreign and security policy. The British Prime minister called on the Europeans not to let "rigid institutional restrictions"¹³ affect post-Brexit security partnership. However, May's message remained largely ambiguous as regards the future security arrangements between the EU and the UK. She pointed out London would "respect the role of the European court of justice" when participating in EU agencies, while preserving its "sovereign legal order". These views were contradicted by the EU's chief negotiator Michel Barnier, as he considers¹⁴ that leaving Europol and the European Defence Agency was the next logical step of Britain's decision. UK officials are equally concerned that Brexit involves the end of Britain's Europol membership and the European arrest warrant.

British officials argue that without a new security treaty post-Brexit, British-European cooperation on tackling terrorism and crime will lack the current capabilities. The British believe that London will be able to negotiate a new security treaty based on a new legal framework outside the jurisdiction of the ECJ. Areas where Britain plans to maintain its presence include: continued membership of Europol, participation in the European passenger name records database, the Schengen Information System II, use of Europol internet referral unit, continuation of its participation in the Prum Convention¹⁵.

a) Why is the Brexit process relevant for Central and Eastern European security?

This section explores the implications of the Brexit process for the European foreign and security policy, given the important role that the UK has played in this policy field after the fall of the communism and the support it has given to the enlargement processes of both the EU and NATO, with a focus on Central and Eastern Europe. The decision to exit the EU structures will leave the UK with the status as member of NATO and permanent membership of the UN Security Council. This also carries significant implications for London in terms of power and influence capabilities. As soon as the exit decision becomes operational, London's political and military weight would be limited to international formats of cooperation.

Brexit is likely to impact the European foreign and security policy as the UK and France are the only Member States with the military capabilities and political will needed to intervene for implementing the EU's crisis management and peace-building operations¹⁶.

Within the EU, new cooperation formats with the UK may develop as latest developments in Brussels highlight institutional progress as regards the Permanent Structured Cooperation (PESCO). French President Macron's speech on 26 September 2017 laid a vision for deep changes in a post-Brexit EU, warning Europe against the dangers of "anti-immigrant nationalism and fragmentation"¹⁷. At the same time, Macron suggested the UK may someday

¹³ Philip Oltermann, "Theresa May wants new security treaty with EU next year", 17 February 2018, *The Guardian*, accessed 11 March 2018, available at: <https://www.theguardian.com/politics/2018/feb/17/theresa-may-wants-new-security-treaty-with-eu-next-year>.

¹⁴ Idem.

¹⁵ Peter Ricketts, "National Security Relations with France after Brexit", Briefing Paper, RUSI, January 2018, p. 12.

¹⁶ Peter Ricketts, op. cit., p. 9.

¹⁷ Emmanuel Macron, "Macron lays out vision for 'profound' changes in post-Brexit EU", *The Guardian*, 26 September 2017, available at: <https://www.theguardian.com/world/2017/sep/26/profound-transformation-macron-lays-out-vision-for-post-brexit-eu>.

want to be part of a bloc moving ahead at different speeds.

The shared interests of Britain and France as regards European security and the continued reliance on NATO in relation to a more aggressive Russia and other various threats highlight the need for cooperation between the two. UK's departure from the EU may trigger a set of shifts in the power balance in the Union's security realm, which may have implications for Central and Eastern Europeans, given the sensitivities and perceptions on security and defence in some countries in the region.

Faced with a more assertive Russia, the UK and France, as Europe's nuclear powers, should step up their consultations on implications for their nuclear deterrence policy in an evolving strategic context, given also the uncertainties around Washington's longer-term commitment to NATO¹⁸. The balance between European powers' and US participation in international security, particularly through EU and NATO, bears major political and strategic importance for Central and Eastern Europe.

Britain has advanced a proposal for a strategic agreement between the EU and the UK in the form of a treaty aiming to ensure the current degree of access for London to instruments such as operational cooperation, policy exchanges on various strategies, cyber threats, law enforcement deals, criminal justice cooperation and data-sharing agreements after Brexit¹⁹.

As regards developments related to the transatlantic relationship in view of the Brexit, an important component of it concerns the future dynamics of requirements in terms of burden-sharing in the security and defence field. When it comes to burden-sharing of the European defence within NATO, apart from the leading nations UK and the US, only Greece, Estonia, Poland and Romania meet the 2% GDP target²⁰. NATO is faced with different military challenges on the Eastern and Southern flanks.

A set of developments such as the election of Trump as US president could also lead to further pressure on European states, including the UK, to assume greater responsibility in the security field. In this context, the UK is likely to plan to further deepen existing efforts to improve bilateral defence cooperation with European NATO members²¹.

Brexit is not expected to alter the fact that the UK and France share common interests in the international rule-based order, given their continued record of close cooperation within the UN Security Council²².

b) What are the main topics related to the Brexit process with relevance for Central and Eastern European security?

The main policy topics related to the Brexit debate with direct bearing for Central and Eastern European security include: the future of the transatlantic relationship after Brexit, UK's role as a global security actor; burden – sharing within NATO and the shaping of the

¹⁸ Peter Ricketts, op. cit., p. 8.

¹⁹ Peter Ricketts, "National Security Relations with France after Brexit", *Briefing Paper*, RUSI, January 2018, p. 12.

²⁰ John Andrews, "NATO after Brexit", *Project Syndicate*, July 2, 2016, accessed 1 April 2016, available at: <https://www.project-syndicate.org/onpoint/nato-after-brexit-by-john-andrews-2016-06?barrier=accessreg>.

²¹ Malcolm Chalmers, op. cit., p. 12.

²² Peter Ricketts, op.cit, p. 11.

European Foreign and Security policy, relations with Russia, overlapping security challenges in Europe's Eastern and Southern neighbourhoods and ways to tackle them. Policy areas which have traditionally received support and attention from the UK so far include the transatlantic link, European Foreign and Security policy and subsequently the European Neighbourhood Policy.

The issue of migration to Europe has come to be a key topic in the wider Brexit discussion, particularly before and during the referendum period. The UK was not the only country however to do so. Populist parties across the EU have used the argument of the lack of a single European approach to the enforcement of external borders to advance questionable solutions such as fence building across borders in South East Europe. While the British referendum "might not set a precedent for further withdrawals, it could encourage repatriation of powers from Brussels"²³ over to the national level in this field. Among Central and Eastern European countries there has been growing concern that escalating humanitarian and security challenges originating in Europe's South would divert attention from the Eastern flank, leaving countries in Eastern Europe exposed to Russia's increasingly aggressive actions. For Jonathan Eyal, the UK is likely to increase its role within NATO, after the Brexit. Dmitry Trenin considers that Brexit will inevitably put further distance between the US and Europe, a move which would be highly favoured by Moscow.²⁴

The Brexit vote and election of Donald Trump as US president have boosted the interest of European leaders for the continent's security and defence. A telling case is that soon after the announcement of the Brexit vote, a Franco-German initiative aiming to relaunch European military cooperation on several issues which the UK had opposed to in the past, such as the establishment of an EU military headquarters. The initiative foresees an EU defence union, operational headquarters and closer integration efforts. The document focuses on the need to ensure consolidated solidarity and the needed European defence capabilities, in the Brexit context. The core group of EU Member States mentioned in the document can move ahead based on articles 42 and 46 of the EU treaty as regards "permanent structured cooperation"²⁵ (PESCO).

The proposal²⁶ initiated by the French defence minister Jean-Yves Le Drian and his German counterpart Ursula von der Leyen sets to serve as a "basis for considering a relaunch of European defence", with the aim to make European defence structures more operational without substituting it for national defence bodies. The proposal foresees the establishment of a European defence headquarters, a common satellite surveillance system, the sharing of logistics resources and of Eurocorps, an intergovernmental military body with France and

²³ Nicholas Dungan, "Europe must recapture its political vision", Chatham House, Royal Institute of International Affairs (2016), accessed 1 March 2017, available at: <https://www.chathamhouse.org/publications/twt/europe-must-recapture-its-political-vision>.

²⁴ "Brexit-An aggravating absence", *The Economist*, 2 July 2016, accessed 1 March 2017, available at: <http://www.economist.com/news/briefing/21701545-britains-decision-leave-european-union-will-cause-soul-searching-across-continentand>.

²⁵ Andrew Rettman, "France and Germany propose EU 'defence union'", *EU Observer*, 12 September 2016, accessed 2 March 2018, available at: <https://euobserver.com/foreign/135022>.

²⁶ "Post-Brexit vote, France and Germany plan 'more active' EU defence", *The Guardian* 2016, accessed 3 March 2017, available at: <https://www.theguardian.com/world/2016/sep/10/france-and-germany-plan-more-active-european-union-defence>.

Germany at its core.

Paris and Berlin have different perspectives on the Common Security and Defence Policy, although both seek to speed up cooperation in the European defence sector, particularly by encouraging an active participation of other European countries in the PESCO proposal launched in December 2017. Paris is set to pursue an ambitious PESCO, while Berlin focuses rather on the inclusive nature of the initiative. The stances of the two major European defence actors towards dynamics in the security field in the context of Brexit are interpreted in the article in both a constructivist and neopositivist key, as the attitudes of France and Germany in this sector are understood in close relation to national security interests and influenced by “history, geography and culture”²⁷.

Biscop provides a neopositivist perspective²⁸ on the topic, based on a detailed assessment of the ongoing debate related to the concrete projects and initiatives in the defence sector expected to emerge through PESCO. One of the key elements of the PESCO initiative, relevant for the policy priorities of Central and Eastern European countries, regards the proposal for “strategic defence capabilities projects” mentioned in the document. The fundamental component to the initiative should target at ensuring strategic enablers, allowing states with a deep focus on security and defence to collectively deploy the needed tools. Capability – related projects is the first dimension of the potential which may be pursued through PESCO. The next layer to this initiative regards the need to create better integrated forces, to allow cost-effective deployment of capabilities across Member States. It essentially involves the set-up of a genuine Franco-German military industrial complex, which other Member States will ultimately have to join, to be able to allow for the development of their own defence industries. British defence industry may also find it necessary to join in this group.

The PESCO proposal is relevant for the Central and Eastern Europeans, as the initiative advances the Franco-German vision for a new defence pact following Britain’s decision to leave the Union. While France seems to focus on planning increase in defence spending, Germany is orienting towards a pragmatic approach aiming to push Europe towards cooperation on military issues²⁹.

The debate around PESCO, also with implications for Central and Eastern European security, concerns whether Berlin is actually willing or able to reconsider its commitment to the Union’s security and defence. For Germany, the focus on prioritising NATO’s article 5 deterrence and defence posture does not raise significant political opposition. A particular aspect of this debate, expected to raise concern for Central and Eastern Europeans, and disagreements between Paris and Berlin, regards reaching a compromise on defence spending levels. Mentioning an agreed defence spending targeting the PESCO criteria list is

²⁷ Anne Bakker, Margriet Drent, Dick Zandee, *European Defence Core Groups. The why, what & how of permanent structured cooperation*, Policy Brief, Clingendael, November 2016, p. 2.

²⁸ Sven Biscop, “*European Defence: What’s in the CARDS for PESCO?*”, Security Policy Brief no 91, October 2017, Egmont Institute, p. 2.

²⁹ Andrea Shalal, Robin Emmott, “EU to sign joint defence pact in show of post-Brexit unity”, *Reuters*, 8 November 2017, available at: <https://www.reuters.com/article/us-eu-defence/eu-to-sign-joint-defense-pact-in-show-of-post-brexit-unity-idUSKBN1D81CT>.

likely to turn this into a legal commitment³⁰.

The UK has generally been considered a difficult partner in EU defence cooperation, as it opposed the most significant initiatives launched by older EU members such as Germany or France. London's traditional over-reliance on NATO for security matters has triggered an opposition to components related to EU defence co-operation such as an EU operational center independent of NATO. On the other hand, London has been a solid and credible military power in the EU, being one of only five members currently spending 2% of GDP on defence and holding the most significant number of deployable forces in the Union.

Though London is set to continue to have an interest in shaping EU policies even after leaving the EU, over the next period it will most likely focus on the repatriation of competencies from the EU to the UK and its devolved governments. As for Europe, it will face the need to adjust its structures, policies and budgets to cope with the UK's exit. This will most likely involve burden-sharing debates between Member States³¹.

c) How are topics related to the Brexit process and European foreign and security policy covered in the British and Central and Eastern media and policy-making environments?

This section covers the empirical dimension of the research around the Brexit process and perceptions in Central and Eastern Europe. The perspective of the UK leaving the EU is coupled by media in Central and Eastern Europe with acknowledgement that Europeans should increase their share of burden in European security and rely less on the United States for this task. Brexit is broadly viewed with varying degrees of concern in countries like Poland and Romania and to a lesser extent in Hungary and the Czech Republic.

More than a decade after the adoption of the European Security Strategy in 2003, the High Representative for Foreign Affairs and Security Policy has been tasked with the preparation of a EU Global Strategy by June 2016. The new document proposed a set of guidelines and a set of tools needed to deliver the essentials for the Member States, including as regards the future of relations with the neighbourhood and Europe's strategic neighbours. The strategy acknowledges the role of Brexit in the current context of changing conditions and relevance³² for the search of a strong European Union, capable of advancing a unified strategic vision.

Current external crises around the EU challenge Europe's ability to continue acting as a pole of attraction for its Southern and Eastern neighbourhood. The enlargement model ensuing from the 2003 European Security Strategy³³ was essentially based on the EU's normative view of the world as a space which could be shaped through a set of good governance rules, mutually agreed with EU partner countries. The EU governance model aimed to support

³⁰ Anne Bakker, Margriet Drent, Dick Zandee, *European Defence Core Groups. The why, what & how of permanent structured cooperation*, Policy Brief, Clingendael, November 2016, p. 3.

³¹ Malcolm Chalmers, op. cit., p. 3.

³² "Shared Vision, Common Action: A Stronger Europe – A Global Strategy for the European Union's Foreign and Security Policy", *EEAS*, June 2016, accessed 11 March 2017, available at: http://www.eeas.europa.eu/archives/docs/top_stories/pdf/eugs_review_web.pdf.

³³ "2003 European Security Strategy – A Secure Europe in a Better World", December 12, 2003, *Council of the European Union*, accessed 11 March 2017, available at: <https://europa.eu/globalstrategy/en/european-security-strategy-secure-europe-better-world>.

the implementation of social and political reforms in targeted states around Europe, with the ultimate purpose of rendering them into a more stable and prosperous space.

The Brexit process and the debate around it stirred a series of reactions from officials and expert communities in Central and Eastern Europe. For Antoni Macierewicz, former Polish Defence minister, the UK is expected to balance its exit from the EU by consolidating its role within the Atlantic Alliance, particularly with regard to the security of states on Europe's Eastern flank³⁴. In the opinion of the Polish official, it is not a coincidence that the UK is one of the four 'framework states', alongside the US, Germany and Canada to coordinate NATO multinational forces in Eastern Europe. Specifically, the UK is the framework nation for the battalion-sized battlegroup in Estonia and will contribute with 500 troops to the local NATO battalion³⁵.

Romanian President Klaus Iohannis provides an assessment of Brexit: "Brexit can be regarded as a catalyst or accelerator both for opportunities as well as for problematic issues. As for the role of the US in NATO, the US will continue to play the same role as until now, as the most significant NATO member, with the greatest involvement in many areas, both conflictual and non-conflictual"³⁶. As regards prospects for the progress of the European Foreign and Security policy, the Romanian head of state considers "there is no intention to create a European army [...] as a European army would involve that each Member State give up part of its sovereignty"³⁷.

Romanian scholars and analysts share the view that Brexit is just an aggregator for pending issues as regards the future of the EU construction and does not represent the EU's sole problem: "The EU won't disappear because of what happens with Britain's exit. At least not now, and not because of the Brits, regardless of how great the shock may be."³⁸ For Naumescu, the Brexit has been primarily an „uninspired internal political manoeuvre [of former British PM David Cameron], having little to do with Brussels"³⁹. Romanian experts largely view the Brexit process as adding up to the complex set of economic, political and security challenges faced by the EU in the past years. They favour a continuation of a strong presence of the US military in Europe and is sceptical of initiatives such as the Franco-German plan for better

³⁴ Robert Lupițu, "Ministrul Apărării din Polonia înainte de summitul NATO: "După potențialul Brexit, mă aștept cu siguranță la o creștere a rolului Marii Britanii în NATO", [Polish Defence Minister before the NATO summit: "After the potential Brexit, I expect UK's NATO role to increase], 5 July 2016, *Calea Europeană*, accessed 12 March 2017, available at: <http://www.caleaeuropeana.ro/ministrul-apararii-din-polonia-inainte-de-summitul-nato-dupa-potentialul-brexit-ma-astept-cu-siguranta-la-o-crestere-a-rolului-marii-britanii-in-nato/>.

³⁵ Justyna Gotkowska, "NATO's Eastern Flank – a new paradigm", Centre for Eastern Studies (OSW), 13 July 2016, accessed 12 March 2017, available at: <https://www.osw.waw.pl/en/publikacje/analyses/2016-07-13/natos-eastern-flank-a-new-paradigm>.

³⁶ Klaus Iohannis, Speech at the think tank Citadel's debate "The European Union between disintegration and reform. Romania's contribution to the consolidation of the European construction", 17 November 2016, Babeș-Bolyai University Cluj-Napoca, accessed 23 March 2017, available at: <http://www.presidency.ro/ro/media/agenda-presedintelui/participare-la-dezbaterea-grupului-de-reflectie-citadel>.

³⁷ Ibid 36.

³⁸ Valentin Naumescu, "Criza Uniunii Europene și noua ordine globală. Șapte perspective [Crisis of the EU and the new global order. Seven perspectives]" in *Criza Uniunii Europene și ordinea globală în era Trump [The Crisis of the European Union and the World Order in the Trump Era]*, editor Valentin Naumescu, Bucharest, Contributors collection, Trei Publishing House, 2017, pp. 15-59.

³⁹ Ibid 38.

integrated European armed forces.

As for Bulgarian experts, Dimitar Bechev shares the opinion that NATO will continue to play the lead role in European defence, despite the Franco-German initiative on a consolidated EU defence and security cooperation. The Franco-German plan is regarded as the product of an internal EU crisis, the Brexit referendum and seeks to show to the world that the EU still is an important international actor. The challenge in his opinion is to render this proposal into a functional one, given Germany's more reluctant position on strengthening the EU defence policy and ideological gaps between the different EU Member States on the topic. Bechev also sees a role for Warsaw in this initiative. For Bechev, NATO emerged stronger and more cohesive after the episode of the Crimean occupation by Russia and the Warsaw summit. Given these elements, countries on the Eastern flank are expected to rely in the future more on NATO as the main institutional fore for security and defence issues⁴⁰.

On the other hand, countries such as Hungary, Austria and France have manifested their openness towards lifting or downsizing the level of sanctions against Russia⁴¹. Hungarian foreign affairs minister Péter Szijjártó was among the early critics of the EU's policy of sanctions against Russia, questioning their effectiveness in moulding Moscow's conduct and expressed concerns over impact on central European exports⁴². These views highlight the significant gaps between EU Member States as regards their commitment to sanctioning Moscow over its role in the Eastern Ukraine conflict. This opinion is shared by Hungarian Prime Minister Viktor Orbán, who showed concern over the future of economic relations between Central European countries and Russia.

The same position has been found in the French Senate's resolution, calling for the lifting of EU sanctions against Moscow, following the occupation of Crimea. The proposal called for a "gradual relief"⁴³ of restrictive measures imposed by the West. Although it has a non-binding character, the resolution is telling for a mind state which has become constant in France⁴⁴. Yet, it must be highlighted that neither the positions taken in Hungary nor that adopted in France have changed the EU's current stance on sanctions against Russia. This happened mainly due to Germany's steadiness as regards maintaining the sanctions regime against Moscow and its capacity to ensure a cohesive voice so far⁴⁵.

UK experts believe that Central and Eastern European states will only invest in CSDP if the EU is ready politically to stand up to Russia with a cohesive voice. However, to ensure a united commitment to EU initiatives, more work should be put into ensuring that EU's

⁴⁰ Ana Maria Luca, "Interview Harvard expert: NATO will continue to do the heavy lifting in European defence", *Agerpres*, October 10, 2016, accessed 26 March 2017, available at: <https://www.agerpres.ro/english/2016/10/10/interview-harvard-expert-nato-will-continue-to-do-the-heavy-lifting-in-european-defence-18-00-46>.

⁴¹ Andrew Byrne, "Hungary questions EU sanctions on Russia", *Financial Times*, 16 October 2014, accessed 20 October 2017, available at: <https://www.ft.com/content/3af681ee-550f-11e4-b616-00144feab7de>.

⁴² Andrew Byrne, op. cit.

⁴³ "French Senate supports resolution to lift EU sanctions against Russia", *RT*, 8 June 2016, accessed 27 October 2017, available at: <https://www.rt.com/news/345898-french-senate-lifting-sanctions/>.

⁴⁴ Andrew Kramer, "French leader Urges End to Sanctions Against Russia over Ukraine", *New York Times*, 5 January 2015, accessed 27 October 2017, available at: <https://www.nytimes.com/2015/01/06/world/europe/francois-hollande-says-destabilizing-sanctions-on-russia-must-stop-now.html>.

⁴⁵ "EU Extends Sanctions Against Russia", 22 June 2017, *Radio Free Europe*, accessed 29 December 2017, available at: <https://www.rferl.org/a/eu-extends-sanctions-against-russia-ukraine/28573860.html>.

CSDP initiatives are aligned with NATO's defence planning and institutional processes, to avoid duplication. EU-NATO cooperation is also still negatively impacted by pending issues such as insufficient spending on defence in many European states⁴⁶. These topics have acquired increasing relevance in the Trans-Atlantic discourse since former Secretary Albright's speech to the North Atlantic Council ministerial reunion, highlighting the 3 D's: "The key to a successful initiative is to focus on practical military capabilities. Any initiative must avoid pre-empting Alliance decision-making by de-linking ESDI from NATO, avoid duplicating existing efforts, and avoid discriminating against non-EU members"⁴⁷.

Furthermore, the discourse that officials in Brussels, Berlin and Paris have supported since Donald Trump was elected President of the US was focused on balancing the uncertainty about the future of transatlantic bonds through increased integration of European defence industries, development of military capabilities and building effective command and control systems. Once Brexit comes into effect, it is likely it would allow these developments by creating institutional structures that previously London had opposed.

UK experts are also aware that EU unity is not to be taken for granted, especially on long-standing sensitive issues such as relations with Russia and the wish of old EU Member States to balance excessive pro-US positions in some Central and Eastern countries. For Nick Witney, EU regulations have priority over any agreements with third countries, as in the case of the post-Brexit UK. He also raises the question as to what the British can bring to the table in the current context and given the emergence of PESCO as a key institutional format for deepening defence cooperation among EU members⁴⁸.

As the Ministry of Defence and Foreign Office are elaborating plans for continued cooperation venues with the EU after Brexit, the Brits are aware that including areas such as foreign policy and defence in any deal makes it more likely that Brexit negotiations will not be concluded within the two years' deadline set under article 50. This would require an interim deal to be concluded, provided the UK makes a clear offer to cooperate in these policy areas⁴⁹.

3. Impact of Brexit on the security policy discourse in Central and Eastern Europe

UK has traditionally played an essential role in the consolidation of the Euro-Atlantic link and common interests concerning the orientation of the foreign and security policy. Shortly after the issue of results of the Brexit vote, the UK assured the NATO Secretary General of the

⁴⁶ Sophia Besch, "EU defence, Brexit and Trump: The Good, the Bad and the Ugly", Centre for European Reform, London, December, 2016, p. 13

⁴⁷ Remarks by US Secretary of State Madeleine Albright, NATO HQ Brussels, 8 – 9 December 1998, Foreign Ministers Meeting.

⁴⁸ Mark Leonard and Nick Witney, "Mark Leonard's World in 30 minutes – European Security after Brexit", ECFR, accessed on 20 December 2017, available at: <https://soundcloud.com/ecfr/european-security-after-brexit>.

⁴⁹ Patrick Wintour, "Defence cooperation talks with EU could delay Brexit process", *The Guardian*, 18 November 2016, accessed on 20 December 2017, available at: <https://www.theguardian.com/politics/2016/nov/18/defence-cooperation-talks-with-eu-could-delay-brexit-process>.

country's unaltered commitment to the Atlantic Alliance⁵⁰.

Dividing lines exist not only between Europe's North and South as concerns the scope and depth of economic and political integration, but also between its East and West – particularly as far as relations with Russia are concerned. If a decade ago good governance was the norm the EU has been seeking to promote mostly outside of its borders, this has recently become a bone of contention among Member States. Europe currently experiences serious difficulties in promoting good governance pattern back at home.

A regional survey conducted in the so-called Visegrad 4 (Hungary, the Czech Republic, Poland and Slovakia) countries on foreign policy trends⁵¹ revealed that expectations and perceptions in Central and Eastern Europe as regards the future of EU integration are diverse and fragmented. While Polish and Czech experts expect more differentiated integration patterns, Hungarian respondents consider that large member states such as Germany and France are likely to increase their dominance in European policy-making. On foreign and security policy issues, all V4 countries expressed views that NATO would be able to adjust to the new security context on the Eastern flank. They also expect that the transatlantic relationship will consolidate in the near future in the security and trade areas. Differences in regional perceptions on the policy towards Eastern policy and Russia persist, while responses on the continued importance of the transatlantic relationship were the most cohesive in the V4 group. Significant differences in opinions emerged as regards orientation towards other major regional and international actors: while Polish experts favoured EU larger Member States as key partners, the Hungarians ones highlighted the importance of Russia as a security actor while Czechs and Slovaks pointed out to the role of smaller countries in the proximity such as Austria⁵².

Despite similar perspectives on regional security and comparable proportions of budget spending on defence, Polish and British approaches differ⁵³ when it comes to EU common security and defence policy. Polish experts perceive the UK as constantly seeking to weaken this component of the European integration, given its over-reliance on NATO and inter-governmental cooperation formats or “coalitions of the willing”. On the other hand, Warsaw has been trying to support the EU's defence policy building processes. This approach brings Poland closer to the Franco-German initiative for a European common defence force, element which differentiates Warsaw from Bucharest on this particular topic.

As for Bulgarian officials, they questioned the EU's sanctions policy towards Moscow, through the voice of President Rumen Radev. He considers that the sanctions regime is impacting negatively both the Russia and European economies, without bringing any

⁵⁰ “Brexit - An aggravating absence”, *The Economist*, accessed 1 March 2017, available at: <http://www.economist.com/news/briefing/21701545-britains-decision-leave-european-union-will-cause-soul-searching-across-continentand>.

⁵¹ Milan Nič, Vít Dostál, “Central Europe's Outlook on the EU and Foreign Policy”, Judy Dempsey's Strategic Europe, *Carnegie Europe*, 2016, accessed 10 March 2017, available at: <http://carnegieeurope.eu/strategieurope/?fa=62423>.

⁵² Milan Nič, Vít Dostál, “Central Europe's Outlook on the EU and Foreign Policy”, Judy Dempsey's Strategic Europe, *Carnegie Europe*, 2016, accessed 10 March 2017, available at: <http://carnegieeurope.eu/strategieurope/?fa=62423>.

⁵³ Karolina Borońska - Hryniewiecka, Elżbieta Kaca, Sebastian Płóciennik, Patryk Toporowski, “*Probable EU – UK Relationship after Brexit: Perspectives of Germany, France, Italy, Spain and Poland*”, Polish Institute of International Affairs, Warsaw, May 2016, accessed 7 March 2017, available at: https://www.pism.pl/files/?id_plik=22014.

benefits⁵⁴. Radev has yet admitted that the annexation of the Crimean Peninsula represents a violation of international law. As for challenges on Europe's Southern flank, president Radev connects the migratory fluxes with the possibility of increased terrorist activity in Europe. However, just as Hungary, Bulgarian officials have not taken concrete steps to materialize these objections and aligned to the rest of Europe in maintaining sanctions against Moscow intact. On the other hand, countries which faced difficulties in mitigating trade opportunities include Finland, Poland and the Baltic states⁵⁵.

Polish officials particularly view the United Kingdom as a close partner, having a "common perception on European problems."⁵⁶ Furthermore, the emerging two-speed European project built around the euro zone does not bode well for Warsaw. In Marcin Zaborowski's opinion, "Poland as a non-euro member probably won't get any invitation to be part of the new core of Europe⁵⁷", which is an equivalent for marginalization. Eugeniusz Smolar considers that "Poland's security is guaranteed by NATO, but Poland's place in the EU will be affected by Brexit. The EU will be smaller and Poland's role in that EU will be even smaller."⁵⁸ Furthermore, Brexit is viewed with increased concern by media and decision-makers in countries like Poland, which have long viewed the UK as an essential partner in the field of foreign and security policy – making. At the same time, this concern should be regarded in a nuanced way as Polish officials expect Brexit to be accompanied by greater involvement of the UK in NATO structures, to compensate for the exit from European foreign and security decision-making structures.

Experts from old EU Member States view the Brexit vote as triggering a complex set of changing dynamics: since the UK will no longer be able to broker between Brussels and Washington, the latter will seek direct cooperation with Berlin and Paris. Furthermore, the US is expected to be put in a position to act as a balancing actor between London and the main European players such as Germany and France. From a foreign and security policy perspective, it is very likely that the European security requires renewed American commitment and presence in Central and Eastern Europe, to prevent further perception rifts within NATO⁵⁹.

The way the EU seeks to reset its security architecture and relationship is directly impacted by the Brexit process. As for the external dimension, challenges originating in Europe's Southern and Eastern neighbourhoods have had a surprising and unprecedented force in limiting the scope of EU's ambitions as a global actor. Divisions on what the European Neighbourhood Policy and NATO's future enlargement policy should look like, relations with Russia and the limits of engagement with countries in Eastern Europe and the Caucasus

⁵⁴ "Sanctions 'hurt' Russia and the EU, says Bulgaria President Rumen Radev", *Euronews*, The Global Conversation, accessed 25 March 2017, available at: <http://www.euronews.com/2017/02/16/sanctions-hurt-russia-and-the-eu-says-bulgaria-president-rumen-radev>.

⁵⁵ Frank Holmes, "Brexit could save Russia billions of dollars", *Business Insider*, 3 July 2016, available at: [http://www.businessinsider.com/brexit-could-lift-russian-sanctions-2016-7?utm_source=feedburner&utm_medium=referral&utm_medium=feed&utm_campaign=Feed%3A+businessinsider+\(Business+Insider\)](http://www.businessinsider.com/brexit-could-lift-russian-sanctions-2016-7?utm_source=feedburner&utm_medium=referral&utm_medium=feed&utm_campaign=Feed%3A+businessinsider+(Business+Insider)).

⁵⁶ Jan Cienski, "Poland Mourns Brexit", *Politico*, June 28 2016, accessed 10 March 2017, available at: <http://www.politico.eu/article/poland-mourns-brexit/>.

⁵⁷ Jan Cienski, op. cit.

⁵⁸ Jan Cienski, op. cit.

⁵⁹ Stefano Stefanini, "How Brexit hurts NATO", *Politico*, July 7 2016, accessed 10 March 2017, available at: <http://www.politico.eu/article/how-brexit-hurts-nato-member-countries-jens-stoltenberg-david-cameron/>.

add up to the complex equation that the EU currently faces.

Since the security component in the Eastern neighbourhood cannot be achieved without the stability component attached to it, Brexit puts the EU in a position to struggle for a reset of its interests and objectives in relations to Russia, also with an eye to ways in which Moscow can be engaged in the Southern Caucasus and the Middle East.

Expected impact of Brexit on EU – Russia relations

Once the Brexit process is complete, the EU is expected to lose one of its strongest supporters of a hard line on Russia. However, the impact of the Brexit vote on the EU's policy towards Russia is unlikely to happen overnight, as the process is likely to take years. Petras Austrevicius, a liberal member of the European Parliament's Foreign Affairs Committee from Lithuania, considers that London "has always been a staunch and a very stable partner in terms of shaping the EU's policy towards Russia"⁶⁰ and that any decrease of its role in the Union would have a negative impact on this issue. In broad lines, the Brexit process is however likely to render the EU policy towards Russia less effective.

The UK has so far played an important role in keeping the US and European partners aligned on a set of issues including sanctions against Russia. Polish decision-makers have expressed concerns that an abrupt UK exit from the EU would render the Transatlantic link more fragile, in a period critical for preserving unity of vision on Russia on both sides of the Atlantic⁶¹.

Britain has been the EU's most vocal critic of Russia's 2014 annexation of the Crimean Peninsula and served to impose sanctions against Moscow's financial, energy and defense sectors. Stephen Wall raises⁶² the question whether the EU could have imposed sanctions on Russia without the EU. Furthermore, Brexit could undermine any future development of serious EU military capabilities and France would remain the only major military power in the EU.

Polish politician Jacek Saryusz-Wolski views the EU as more likely to become unstable on its Russian sanctions position as Britain prepares to exit the Union. Saryusz-Wolski considers that Poland will have to find a way to "compensate" for losing the UK from the camp of states which support a tougher position towards Moscow, while the British are expected to "lose all the benefits they had in the EU"⁶³. However, for the Berlin-based Russian political commentator Leonid Bershidsky, the sanctions issue and Europe's long-term construction depends much more on Germany rather than on Britain: "If the EU becomes more cohesive

⁶⁰ Carl Schreck, "After 'Brexit' Vote, Fears of EU Losing Influential Voice on Russia", *Radio Free Europe*, 24 June 2016, accessed 12 March 2017, available at: <http://www.rferl.org/a/brexit-russia-eu-britain-influence-sanctions-policy/27819247.html>.

⁶¹ Jason Douglas, "Polish Official: Brexit threatens Trans-Atlantic Ties", *The Wall Street Journal*, October 2016, accessed 9 March 2017, available at: <https://www.wsj.com/articles/polish-official-brexit-threatens-trans-atlantic-ties-1475955925>.

⁶² Oliver Patel, Christine Reh, "*Brexit: The Consequences for the EU's Political System*", UCL, Constitution Unit Briefing Paper, accessed 7 April 2017, available at: <https://www.ucl.ac.uk/constitution-unit/research/europe/briefing-papers/Briefing-paper-2>.

⁶³ Karolina Zbytyniewska, "Saryusz-Wolski: Trump is not the end of the world", *Euractiv*, 2 February 2017.

without the UK, which often pulled in the other direction, and if the US plays a role, Brexit may end up being a setback for Putin's foreign policy goals⁶⁴.

Europe's overall economic engagement with Russia remains limited to the terms foreseen by the regime of sanctions. The most economically significant sanctions imposed by the EU, the US and their allies against the Russian economy in the aftermath of the annexation of Crimea include interdictions on loans, investments in further energy projects, and a ban on arms sales to Russia. When assessing the effect of these sanctions and whether their continuation might induce a change of policy in Moscow, a set of pre-existing economic factors emerges as critical. These are represented by the structural downturn of the Russian economy before the introduction of the sanctions regime against Moscow and the decline in oil prices. They make it particularly difficult to isolate the specific economic effect of Western sanctions on the Russian economy⁶⁵.

By leaving the EU, Britain will no longer be part of the consultation and policy-making process involving EU Member States at the level of the Political and Security Committee (PSC), nor of the ministerial reunions and joint meetings with third countries. Furthermore, it should be in Britain's interest to align with EU positions, as regards imposing sanctions, where actions by London alone would have limited impact. It could be possible, according to some experts, to negotiate structured consultations with the PSC. However, London will have to put much more effort in engaging EU Member States individually, France in particular, considering its major role in European decision-making in this field⁶⁶.

Western sanctions against Russia targeted several vital sectors of the national economy: finance, energy and defence. The defence sector was partially affected by the sanctions, given the traditionally modest arms trade between the West and Russia. Russia's soft power and propaganda instruments in the region and beyond have been upgraded to a scale reminding of the Cold War period. The implementation of the DCFTA foresees a set of policy measures aiming to liberalize trade, for instance through lower tariffs and reductions in non-tariff barriers, as well as tackling technical barriers to trade between Ukraine and the EU.

The growing assertiveness of Russia means that the security threats to the UK originating in its immediate neighbourhood are now more important than at any time since the end of the Cold War. Should this line of dynamics continue, UK's interest in European security could grow, even faced with a diminished capacity to shape the collective responses (Chalmers, 2017: 8).

The UK's influence outside the European neighbourhood should be easier to exert, given its internationalist political culture and resources committed, including the role as permanent member of the UN Security Council. As the UK's foreign policy has a strong component to it, its role as a valued global partner to the US is likely to remain unaffected by Brexit, while its function as a potential venue for US influence in relation to the EU is likely to diminish⁶⁷.

⁶⁴ Carl Schreck, "After 'Brexit' Vote, Fears of EU Losing Influential Voice on Russia", *Radio Free Europe*, 24 June 2016, accessed 12 March 2017, available at: <http://www.rferl.org/a/brexit-russia-eu-britain-influence-sanctions-policy/27819247.html>.

⁶⁵ Iana Dreyer, José Luengo- Cabrera (Eds.), "On target? EU sanctions as security policy tools", EUISS, Report no. 25, September 2015, accessed 3 March 2017, available at: http://www.iss.europa.eu/uploads/media/Report_25_EU_Sanctions.pdf.

⁶⁶ Peter Ricketts, op. cit., p. 13.

⁶⁷ Malcolm Chalmers, op. cit., p. 7.

4. Conclusions

In the past two decades, UK's foreign policy has been directed at security crises away from Europe's neighbourhood. The relevance of these wider commitments may increase in a post-Brexit context, as the cabinet pursues to develop its commitment to a 'Global Britain' policy as part of efforts to reorient focus from Europe. The perceived price for more national control over foreign policy tools resulting from the Brexit is a significant decline in influence with regard to common European foreign policy⁶⁸.

Russia's growing assertiveness, manifested also in recent events on the UK territory, poses now a direct challenge to London's view. The European Council Conclusions on 22 March on the Salisbury attack highlighted that the community of shared values and solidarity between the EU and the UK will remain close, strongly condemning the actions of the Russian Federation on the British territory and understood as a serious challenge to "our shared security"⁶⁹. The statement pointed out also to the need to enhance cooperation between the EU, its Member States and NATO, in an effort to consolidate resilience in the face of the current risks.

Most opinions⁷⁰ showcased agree that Brexit would weaken the EU's global standing. Without UK's top capabilities, analysts and politicians consider the EU would be less influential internationally. From the perspective of Central and Eastern Europeans, the debate on the future of EU-UK security and defence relations is interpreted in different nuances, reflecting national and foreign policy orientations. In spite of ongoing dynamics at the European level, pointing towards renewed focus on the consolidation of a cohesive European security and defence force, the debate remains mostly centred on operational issues which are still under consideration among EU members themselves. The complexity of implications of the Brexit adds new layers to the debate.

Sensitivities characterizing Poland, the Baltic States and Romania are not shared by other countries in the region, such as Hungary or the Czech Republic, which favour more relations with Russia or Germany as external partners. Even after the materialisation of the Brexit process, London is largely expected to continue having close relations with the Europeans in the security field.

The article opens new exploration venues over a process which is ongoing and likely to change dynamics at fast pace over the coming years, in relation not only to EU-UK relations in the security and defence sector but also in a wider international setting, given London's global outlook. Regional dynamics and foreign policy priorities are analysed in a post-Brexit context, as the EU is seeking to readjust to a changing regional and international environment, and, most importantly, design a foreign and security policy adapted to the new security realities around it.

⁶⁸ Malcolm Chalmers, *op. cit.*, p. 8.

⁶⁹ "European Council Conclusions on the Salisbury attack, 22 March 2018", *EEAS*, Brussels, March 23 2018, https://eeas.europa.eu/delegations/russia_en/41920/European%20Council%20conclusions%20on%20the%20Salisbury%20attack.%2022%20March%202018, accessed on March 28, 2018.

⁷⁰ Oliver Patel, Christine Reh, "Brexit: The Consequences for the EU's Political System", *UCL*, Constitution Unit Briefing Paper, accessed 7 April 2017, <https://www.ucl.ac.uk/constitution-unit/research/europe/briefing-papers/Briefing-paper-2>

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