



**Testimony of Natalia Banulescu-Bogdan**

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***Weaponized Mass Migration: A Security Risk to Europe and the United States***

**Before**

**U.S. House of Representatives, House Committee on Foreign Affairs, Europe  
Subcommittee**

**February 10, 2026**

Chairman Self, Ranking Member Keating, and distinguished Members of the Subcommittee:

Thank you for the opportunity to testify today before the House Committee on Foreign Affairs' Europe Subcommittee. My name is Natalia Banulescu-Bogdan, and I am the Deputy Director of the International Program at the Migration Policy Institute, a non-partisan, independent research institution focused on practical and effective policy options for managing immigration in ways that serve all elements of society.

The weaponization of migration for political purposes has been increasingly recognized in countries around the world as a threat that demands a strong yet proportional response. So we appreciate the subcommittee's focus on this issue and the opportunity to testify today.

The concept of "instrumentalization" or "weaponization" of migration is a term applied to a wide range of scenarios involving actors using migration as a coercive tactic or negotiating tool.<sup>1</sup> Countries such as Russia, Belarus, Turkey, Libya, and Morocco have used the threat of uncontrolled migration as leverage with the European Union to extract concessions, retaliate for sanctions, or divert policy attention away from other issues (with these tactics being replicated as far away as Nicaragua engineering irregular migration from Libya and other countries to the United States). This has sparked a variety of policy responses from the European Union and its member states, from short-term border closures to restrictions on asylum processing that linger well beyond the end of the specific crisis.

The threat of manipulating immigration flows across shared borders is being used—increasingly explicitly—to subvert traditional power dynamics amounting to what the European Union has referred to as "hybrid warfare." Belarus, with Russian support, has systematically orchestrated migration flows toward European Union borders since 2021. This practice has involved incentivizing migrants from Iraq, Syria, Afghanistan and Yemen to fly into Belarus as tourists, including by relaxing visa regulations, working with state-owned tourism companies to arrange visas and transport, and even providing equipment to cross the border into Poland, Lithuania, and Latvia. The goal is to destabilize these countries (and the European Union more broadly) and retaliate against earlier-imposed EU sanctions. But the term weaponization also captures many incidents that are driven by different objectives. There are numerous examples where states that regularly cooperate with the European Union on border enforcement, returns, or hosting refugee populations may weaponize migration (or threaten to do so) in order to extract political or economic concessions. This underscores the importance of understanding who is using this tactic and for what end.

In turn, not all responses to weaponization are created equal. This testimony describes the tradeoffs of the traditional tools that the European Union and its allies have at their disposal but also recommends a broader lens through which to view potential policy responses. Because

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<sup>1</sup> The European Union defines instrumentalization as situations where a third country instigates irregular migration flows into EU territory by actively facilitating the movement of people to its external borders. European Union, "[Regulation \(EU\) 2016/399 of the European Parliament and of the Council of 9 March 2016 on a Union Code on the rules governing the movement of persons across borders \(Schengen Borders Code\)](#)," (July 10, 2024).

weaponization grows in the cracks of migration mismanagement—when high levels of public anxiety about migration create fertile ground for these tactics to work—critical investments are needed to reduce opportunities for bad actors to exploit these gaps. This entails making immigration systems and partnerships more stable and resilient—not just fortifying the cracks as they appear—which often includes creative and strategic *expansion* alongside strategic restriction.

Indeed, the European case is illustrative precisely because alongside new policies to deter, punish, and respond to weaponization, Europe is also working to overhaul its entire migration system. New EU policies allow for quicker asylum processes and more “upstream” assistance to give people alternatives to smuggling and unauthorized movement before they arrive; enhanced use of legal migration pathways, including work visas for people to move legally; and stronger diplomacy with migrant-origin and transit countries to manage movements and facilitate returns.

Nowhere is this holistic approach clearer than in Europe’s response to Ukraine, where the EU managed to activate the Temporary Protection Directive (TPD) a few days after Russia’s 2022 invasion, thereby granting legal status to displaced Ukrainians arriving in Europe. By taking a bold approach mixing strong border monitoring and enforcement against security risks, with dramatic expansion of safe, legal options to move, Europe was able to prevent the real possibility that Russia exploited the threat and chaos of mass Ukrainian displacement into Europe as a tool of hybrid warfare.

Ultimately, the European case illustrates both the dangers of inadequately managing migration systems (leaving them vulnerable to weaponization) and the benefits of a holistic approach to immigration—showing that a blend of both strong enforcement and strategic expansion of legal pathways is often a smarter, more sustainable route forward.

### ***Background and European Context***

Weaponization is not a new phenomenon. One of the principal scholars on this issue finds that this form of instrumentalization has occurred over 85 times since 1951, with almost three quarters of “coercers” achieving some of their goals.<sup>2</sup> The Lukashenko regime’s weaponization of migration flows from Belarus to the European Union follows a playbook established by Muammar Gaddafi and other state and non-state actors seeking to use migration as a threat to extract political and economic concessions.

Arguably, what *is* new is the way in which weaponization is being deployed. The weaponization of migration flows often occurs in increasingly explicit tones, in a context where public anxiety about immigration is already heightened in many European states. Recent incidents of weaponization may also involve non-state actors too (such as smugglers, militias, or criminal gangs), adding to the complexity of forging an effective response. The reach of weaponization is also expanding. Historically, weaponization often consisted of sending migrants and refugees across a shared

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<sup>2</sup> Kelly M. Greenhill, “Migration as a Weapon in Theory and in Practice,” *Military Review*, November-December (2016): 23– 36; Kelly Greenhill, “[Weapons of Mass Migration: Forced Displacement as an Instrument of Coercion](#),” *Strategic Insights* 9, no. 1. (2010): 116-159.

border, but this tool is now being deployed further afield. The artificial migration route Belarus engineered across its border with Europe was composed of migrants first “imported” to Belarus by the state issuing tourist visas to nationals from countries such as Iraq, Syria, and Afghanistan. Russia’s military operations in Libya have also enabled it to generate migration flows towards Europe and even the United States (via Nicaragua) in what numerous analysts have described as a destabilizing tactic.<sup>3</sup>

Weaponization can be highly effective for a few reasons. Threatening to manipulate population flows is a low-cost, and relatively high-reward strategy for countries that lack traditional forms of power (economic, military, political) but that enjoy geographic advantages vis a vis more powerful countries. Given the low costs involved, states can repeatedly engage in these tactics (even if their first attempt does not achieve its aim). And while some retaliatory measures are effective in stopping flows in the short run, the diffusion of these penalties limits their effectiveness over the long term. Certain forms of retaliation (including economic sanctions or visa restrictions) may hit average citizens harder than those who have organized the criminal activity. Also, bad actors are typically less vulnerable to reputational damage—as they may already be undemocratic actors willing to violate or push against the limits of international norms (for instance around human rights), and who are less concerned about either the repercussions or any reputational costs that follow from this.

Notably, the power of weaponization also comes from anxiety about illegal migration itself. Which is further fueled by tactics that expose the limits of what high-income destination countries can do quickly to respond to a rapid escalation within the constraints of national and international law and norms, and with the resources and personnel they have on hand. These tactics skillfully expose the tension between humanitarian protection norms and political and practical realities. So in some ways, the weapon itself is fed both by anti-immigration sentiment and the complexity and clunkiness of current systems, which makes it an especially serious threat right now.

For Europe specifically, its vulnerability to weaponization stems from several factors. One is Europe’s relative proximity to multiple countries experiencing instability or which are hosting large numbers of migrants and refugees. Challenges reaching consensus on a common European approach to migration and asylum is another key factor, which for example has delayed first the negotiation and the implementation of the EU Pact on Migration and Asylum. Finally, like other high-income countries, member states’ asylum systems are designed to provide due process under international law and safeguard individual rights, but they can come under significant strain when faced with sudden, large-scale mixed migration flows.

Europe has taken the position that investing in well-functioning migration systems is the critical ingredient for reducing vulnerability to instrumentalization, even as it also invests in creating new

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<sup>3</sup> Tarek Megerisi, [\*The Bear Who Came to Tea: Russia, Libya and the Kremlin’s Playbook for Fragile States\*](#) (policy brief, European Council on Foreign Relations, March 28, 2025); George Scutaru and Andrei Pavel, [\*Weaponization of Migration: A Powerful Instrument in Russia’s Hybrid Toolbox\*](#) (commentary, Hoover Institution, September 17, 2024).

systems and legislation to respond to specific cases of instrumentalization in a more coherent and orderly way.

### ***EU Policy Responses to Instrumentalization and Hybrid Threats***

The European Union and its member states have responded to the instrumentalization or weaponization of migration in two key ways: first, raising the costs for those seeking to weaponize immigration, and second, restricting the uncontrolled migration flows that can result from weaponization.

In the first instance, the European Union has tried to raise the operating costs for facilitators of illegal movement (drawing from a toolbox that includes imposing economic sanctions or visa restrictions, or withdrawing aid/making aid conditional) and leveraging foreign policy tools—with the European Commission putting pressure on capitals in the Middle East to stop providing cheap flights to Minsk, for example. States are also targeting private actors, who play an increasingly central role in facilitating irregular journeys. EU instruments allow measures against airlines, travel agencies, and other transport companies that facilitate state-sponsored irregular journeys, including revoking operating licenses, limiting landing rights, or imposing financial penalties.

Individual member states have also responded to weaponization by trying to prevent entry (increasing border or military personnel, physical fortification, and surveillance) or restricting processing at the border—including temporarily pausing asylum. For instance, Poland constructed a 16-foot-tall steel barrier along the 250-mile Poland-Belarus border at a cost of approximately USD \$415 million. In June 2024, Polish Prime Minister Donald Tusk reintroduced a 40-mile buffer zone along the border, which was subsequently extended in March 2025, and significantly restricted asylum at the Belarus border. The EU's border agency, Frontex, reports that the number of detected irregular border crossings along the Eastern Borders route (including Belarus) fell by 37 percent in 2025.<sup>4</sup> Greece also moved quickly to block irregular entries at its land border with Turkey, following Turkey's decision in February 2020 to suspend its cooperation to prevent irregular migration under the 2016 EU-Turkey deal. While the number of migrants who crossed the border are hard to come by, it was reported that Greece within a 24-hour period had blocked 10,000 irregular entries.<sup>5</sup> Greece's tactics included a one-month suspension of new asylum applications as well as significant border enforcement activities, with human rights groups criticizing the use of pushbacks and excessive force against migrant and refugee populations.<sup>6</sup>

But while these responses have often proved effective in the short term, they can come at a high cost while doing little to dampen the root causes or the appeal of weaponization. State and non-state actors are still turning to instrumentalization or weaponization as a means to extract political and economic concessions from the European Union and its Member States, pointing to a need to

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<sup>4</sup> Frontex, "Migratory Situation in 2025"

<sup>5</sup> Deutsche Welle (DW), "[Greece blocks 10,000 migrants at Turkish border](#)," March 1, 2020.

<sup>6</sup> Amnesty International, [Europe: Pushed Beyond the Limits: Four European Countries' Lack of Responsibility in the Age of Refugees](#) (report, London, 2020).

think more holistically about what could make Europe less susceptible to this threat in the first place.

### ***The Next Generation of EU Policy Responses***

The paradox of weaponization is that in many cases the best strategy is neutralization and preparation rather than escalation: taking the sting out of the issue reduces the strength of the weapon. Looking at the example of the Ukraine refugee crisis, for instance, the fact that the European Union agreed to grant nearly 5 million Ukrainians temporary protection, thereby offering a means of orderly entry and immediate access to legal status and integration services, effectively pre-empted the crisis and stripped Russia and its partners of the potential for instrumentalization. In the same vein, creating safe pathways for refugees through resettlement and labor pathways—alongside infrastructure innovations like creating the possibility for screening and processing further upstream—could similarly “defang” future instances of weaponization.

As with most debates around preventing illegal immigration, deterrence and enforcement are only one piece of the puzzle. Much of the solution lies with creating viable alternatives and bolstering the destination country’s *own* capacity to manage inflows. In other words, setting up orderly legal migration systems is not merely a parallel goal, but in fact a critical tool to reduce susceptibility to weaponization, and thus a concrete investment to blunt its effects.

Europe’s big bet is that more effective overall migration and asylum systems will reduce public anxieties about immigration, and thus make instrumentalization a less effective and appealing strategy for bad actors. In this vein, Europe is rapidly experimenting with a set of nuanced policies that recognize that member states come from different vantage points and needs, and therefore solutions must be tailored without abandoning core values and principles. Policymakers have done this by agreeing on balanced approaches to make asylum systems more resilient (for example, putting in place procedures to screen asylum seekers before they arrive at physical borders, narrowing the grounds for asylum, and experimenting with expedited procedures and detention for people unlikely to be granted status); thinking more creatively about how to use different legal pathways (from making labor visas more accessible to refugees to expanding temporary work visas and using temporary protection in response to mass displacement); and massively ramping up migration diplomacy, including through regional and bilateral partnerships with migrant-transit and origin countries. While the implementation has not been perfect, the ingredients are right and offer the potential for further refinement.

At the same time, all eyes are on the implementation of the EU Pact on Migration and Asylum, which was agreed in June 2024 and contains a Crisis and Force Majeure Regulation that is set to take effect in July 2026. This regulation lets member states derogate from normal EU asylum rules under certain crisis scenarios and triggers certain solidarity measures.<sup>7</sup> Among other things, this will establish border centers that would hold some irregular migrants while their asylum requests are vetted and speed up deportations of those deemed inadmissible. The Pact also includes the

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<sup>7</sup> European Commission, “[Questions and answers on the Pact on Migration and Asylum](#),” October 11, 2024.

opportunity to deviate from EU asylum law when necessary to deal with situations of instrumentalization. Simultaneously, Europe has pushed forward other measures on instrumentalization including amendments to the Schengen Borders Code to allow states to reintroduce or prolong internal border controls when a third country is pushing migrants to EU borders—and arguing that temporary departures from normal asylum rules are necessary under certain conditions.<sup>8</sup> The new EU visa suspension mechanism also allows the European Commission to reintroduce visa requirements are exploring whether instrumentalization could have implications for the European Convention on Human Rights.<sup>9</sup>

Another EU migration priority remains Ukraine, as the Temporary Protection Directive (TPD), which grants displaced Ukrainians temporary protection and access to housing, health care, and the labor market, has been extended until March 2027.<sup>10</sup> This bold approach to the displacement of more than 5 million Ukrainians to Europe,<sup>11</sup> which helped neutralize the threat of Russian instrumentalization of migration, has proven remarkably effective at managing a mass inflow situation while providing streamlined access to protection and helping to achieve better labor market integration outcomes for host societies. The EU decision to renew the TPD has provided some certainty both to displaced Ukrainians, as well as the governments and societies hosting them, and allowed the European Union to engage in ongoing conversations about ways to organize and support the voluntary return of Ukrainians and the rebuilding of Ukraine. It is worth noting that public support for Ukrainians is still high, despite some hospitality fatigue related to the large numbers currently being hosted in Europe and pressures on housing and public services.

### ***Considerations for the United States***

The European context differs from the U.S. context—geographically, politically, and in member states’ ability to flexibly manage migration at EU external borders—but there are important lessons and interests for the United States as Europe restructures its approach to migration. Critically, the EU approach is a holistic one, not narrowly targeting instrumentalization alone but recognizing that instrumentalization is an effective tool for foreign powers because illegal migration is such a salient cause of public anxiety. The bloc’s approach to migration reform through the Pact aims to rebuild public trust in government’s ability to control borders and manage immigration—and thus to reduce the impact and incentives for others to instrumentalize migration, precisely by reducing public anxiety.

Still, as governments look to revamp their long-term approach to immigration, they should also be prepared to tackle migration crises and the instrumentalization of migration when they occur. The temptation is often to respond with one-off transactional actions, using largely coercive tools such as sanctions and suspending visas and trade to force partner countries to stop people from

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<sup>8</sup> European Parliament, “[Revision of Schengen Borders Code](#),” updated March 20, 2025.

<sup>9</sup> Council of Europe, [Informal Ministerial Conference: Conclusions](#) (Athens, December 10, 2025)

<sup>10</sup> Council of the EU, EU member states agree to extend temporary protection for refugees from Ukraine (press release, [June 13, 2025](#)).

<sup>11</sup> Of these, approximately 4.3 million Ukrainians have been granted protection under TPD. Eurostat, Temporary protection for persons fleeing Ukraine - monthly statistics, January 6, 2026.

moving. These reactive deals can allow for quick wins, but over the long term may prove brittle and have unanticipated consequences. Relying on emergency measures to respond is by definition not a sustainable response—and can undermine the very solidarity and cooperation needed over the long term to protect national security interests. For example:

**Lack of durability.** Managing this dynamic solely through reactive, one-off responses may have the effect of preventing or dampening individual instances of instrumentalization—but will not address the root causes or long-term patterns. Instead, they may actually increase the incentives for instrumentalization, if for instance governments have shown themselves willing to provide massive amounts of funding or other significant concessions to stop migrant flows. Coercive measures and threats may help secure migration cooperation, but as with the European threats of visa restrictions to secure Bangladesh’s cooperation on returns, these may only be temporary wins without a more structured, long-term approach. And transactional bargaining may risk breaking down diplomatic relationships and trust (including for countries like Turkey and Morocco, which continue to have complex but still critical roles in EU migration management).<sup>12</sup> Thus, one-off packages to stop instrumentalization once it occurs, whether through carrots or sticks, carry significant risks which underscore the need for preventative, long-term solutions.

**Lack of an exit plan.** Many responses to instrumentalization rely on emergency powers—without a broader framework of accountability—that are then difficult to rein in. Successive European leaders have declared “emergency measures” (for example, Poland in response to Belarus, Finland in response to Russia) that enable forceful pushbacks and returns of migrants and claim the right to temporarily suspend asylum procedures. Crucially, the implementation of crisis response measures often gives an increasing role to military and quasi-military actors, with limited oversight over their actions.<sup>13</sup> But once states reach for this tactic, it may be difficult to put the genie back in the bottle. For instance, after Finland accused Russia of orchestrating the flow of more than 1,300 third-country migrants across the Finnish-Russian border in 2023, Finland approved an emergency law in July 2024 that allowed it to reject asylum applications and send migrants back across the Russian border. The law has since been extended twice, until the end of 2026, given the threat of instrumentalization remains “high and unpredictable.” Without a framework (or time limits) around emergency measures, this could create a vicious cycle where other aggrieved countries claim similar powers to circumvent EU or international law when convenient.

**Lack of due process.** When derogations from asylum law that start as temporary are then codified into national law (as in Lithuania and Poland), this risks not only departing from long-established human rights principles (without adequate oversight) but also the creation of two-tiered and fragmented systems—which is precisely what new EU legislation is seeking to avoid.

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<sup>12</sup> Council of the European Union, “[Presidency discussion paper on Visa Code Article 25a exercise](#)” (discussion paper, Working Party on Integration, Migration and Expulsion (IMEX Expulsion), Council of the European Union, Brussels, January 9, 2024).

<sup>13</sup> Sergio Carrera et al., [Proposal for a regulation addressing situations of instrumentalisation in the field of migration and asylum](#) (European Parliament, 2023). [EPRS\\_STU2023753156\\_EN.pdf](#)

The United States has multiple interests in preventing countries from instrumentalizing migration to Europe. First, there are risks of criminals and terrorists exploiting overwhelmed border operations to enter Europe and targeting U.S. facilities (or moving onward to the United States), as well as broader risks that unregulated flows destabilize European societies, foster unpredictable populist movements, and weaken democratic and norms-based transatlantic alliances. These operational risks are precisely what the European Union is investing in preventing with the Pact—as well as with new experiments in upstream solutions to migration that can create a different model.

But the United States also needs to consider a second set of issues. It is already clear that bad actors learn from each other, and as Europe struggled to deal with instrumentalization from Russia, Morocco, and others, countries in the Western Hemisphere such as Nicaragua copied their tactics. Adversaries such as Russia may be testing out how instrumentalized migration can fit in their geopolitical toolbox and use these tools in different regions, especially given the ease of inter-regional travel. And the more Europe and the United States find themselves responding to migration crises, especially ones involving Russia, Belarus, and other hostile actors—and thus often requiring military and NATO responses—the less political space, resources, and military support is available to attend to other strategic priorities.

For the United States, one element of creating a strong domestic immigration system will be supporting a strong global approach to migration, in partnership with European allies. While short-term, emergency measures (from sanctions to temporary border closures to visa restrictions) are often appropriate in the immediate aftermath of weaponization, claiming extraordinary or “wartime” powers should not become the norm. If a patchwork of go-it-alone crisis measures becomes reified, this will neither serve European interests nor those of its partners. And it may be less effective than it initially appears. Punitive measures or restrictions alone may increase rather than alleviate instability, which is what creates appetite and openings for weaponization in the first place.

In the long run, European security and safety will depend more on strong cooperation with partners, forged through mutual understanding rather than transactionalism, which will help achieve future goals, including those of economic growth and competitiveness.