The evolution of the Hungarian Defence Forces’ volunteer reserve component after the Cold War

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Abstract

When Hungary transformed to an all-volunteer force in 2004, most attention was given to the regular component and very little mention was made of reservists. The main goal of this study is to draw attention to the importance of, and the potential, in the reserve component using historical research to produce an overview of how the reserve component of the Hungarian Defence Forces has evolved since the end of the Cold War. Information was collected and analysed from the discussed time period and interpretations were made of the collected evidence through systematic methods appraising all available studies to synthesise the findings. Similarly to other countries in the region, more than a century of conscription and the Warsaw Pact legacy still haunts the Hungarian Defence Forces. Fortunately, Hungary’s NATO membership spearheaded the drive for qualitative change within the armed forces and more attention was paid to a volunteer reserve system. Hungary’s NATO membership has ushered in a new era of security guarantees and obligations which, among other things, brought with it the realisation that the time for qualitative change in the armed forces had come. Among other changes, an initial shift of emphasis towards a reserve system – followed by the adoption of the all-volunteer force model – made it clear that a new basis had to be provided upon which to address the reserve issue in Hungary.

Keywords:
comprehensive approach, Hungarian Defence Forces, citizen soldier, volunteer reserve component

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Introduction

During the early stages of the history of humankind, it became obvious that just like a normal household, which cannot in the long term do without extra resources, the armed forces cannot exist without reserves being available for immediate use. Since antiquity, some states have recognised the need to supplement their armed forces with reserves (Demeter et al., 2016, p. 13; Weitz, 2007, pp. vii–ix). The idea was to have access if required to a supply of trained reservists capable of carrying out specific military tasks. The realisation that the training and maintaining of a sufficient number of reservists was a vital element of an operable system gradually became the prevailing mindset among those with a profound understanding of such a system (Demeter et al., 2016, p. 13). The size of reserve forces available depended on the economic strength, available manpower, and capacity of a particular country to protect its interest (Dandeker et al., 2011). There are a number of reasons why states needed reservists. Whenever a large part of the armed forces deployed abroad on an expedition, reservists became a supplementary force and protected the security of that country from internal and external threats. Additionally, reservists often managed supply-related tasks, ensured the supply of additional contingents of trained reservists, and enhanced the sense of security of the citizens. They traditionally also played a key role in establishing a link between the armed forces and society (Ben-Ari et al., 2008; Demeter et al., 2016, p. 13; Weitz, 2007, pp. vii–ix). The involvement of reservists was implemented either as a voluntary or as a mandatory operational alternative in carrying out the tasks of the armed forces (Demeter et al., 2016, p. 13).

The view of this author is that no further evidence is needed today to underline the relevance of this problem as it is undeniable that in the age of volunteer reservists and against the backdrop of today's complex security environment, more attention is given to the role of reservists than previously. The immediate post–Cold War years saw a lack of attention given to reservists and reserve forces as most countries sought how to leverage an apparent Peace Dividend. Many countries followed the American example and suspended or reduced conscription, transitioned to an all-volunteer force, plus downsized their regular and reserve forces. Today's complex security environment and the resurgence of great power competition has resulted in countries, including Hungary, paying more attention and prioritising reserve issues and volunteer reservists (Ben-Ari and Lomsky-Feder, 2011; Demeter et al., 2016, p. 23; Tóth and Ujházy, 2016; Ujházy, 2011).

Research Questions

1. Why did the issue of reservists in Hungary need to be viewed from an entirely different perspective after the Cold War?
2. What is the current structure of the Hungarian Defence Forces’ Volunteer Reserve Component?
3. Are reservists with useful civilian skills becoming more relevant in modern armed forces, even if they have no background as former regular service members?
4. Do reservists have a capacity to improve relations between the armed forces and society?
5. Are the outlines of a workable reserve system in Hungary already visible?
A Quick Look at the Hungarian Armed Forces before NATO Membership

The development and training schedule of the Hungarian armed forces during the Cold War took place with the aim of building and maintaining the armed forces in compliance with the requirements imposed by the Warsaw Pact, which meant that Hungary was left without a national military doctrine of its own. The structural, directional, and organisational features, the service branches, military equipment and the dislocation of the armed forces were all set up in accordance with those requirements. Hungary was, alongside other members of the coalition forces, tasked with engaging its troops as an offensive, supplementary force to aid Soviet troops. Due to the offensive nature of Hungary’s involvement, the country’s armed forces were, in many respects, oversized in light of the accomplishable defence objectives. It is a well-known fact that – in view of its structure – the number of personnel, equipment far outstripped the organisational requirements and the capability constraints of the armed forces. Hungary’s ‘legacy’ from the Warsaw Pact years was an armed forces unwieldy in size, inflexible and burdened with daunting tasks, one which was exposed to the consequences of the rapidly deteriorating financial conditions and technical equipment, coupled with various drawbacks and operational inefficiencies (Bárány, 1999, p. 75; Demeter et al., 2016, p. 21). Although Hungary’s armed forces were, broadly speaking, capable of fulfilling the country’s obligations arising from the expectations of its former allies, due to their size and the constraints imposed on them by organisational inadequacies, the quantitative, as well as qualitative attributes of their equipment along with the conditions pertaining to their geographical parameters, the country’s armed forces fell short of performing the tasks necessary to serve the needs of armed forces in a country which had regained its independence.

These conditions required the immediate initiation of radical changes to transform the Hungarian armed forces from an empire’s auxiliaries to one suited for a sovereign country. The new force had to perform domestic and international duties, serve under the supervision and control of the independent Hungarian State, and comply with domestic and international law. The favourable international conditions at the conclusion of the Cold War permitted the downsizing of the Hungarian armed forces and the elimination of their offensive character and capabilities.

Against the backdrop of these conditions, there was no alternative to a radical change having to be initiated without any further delay. To that end, the fundamental requirements had to be governed by the need to transform the armed forces into a national defence mechanism capable of complying with domestic and international standards and requirements, one that was capable of performing its duties related to the defence of the country under the supervision and control of the society. The initial step in this process was the downsizing of the armed forces and, by some stroke of luck, the process was enhanced by favourable international and domestic conditions. These changes were the initial steps towards the elimination of the offensive character of the armed forces. Equally important elements of transformation were the alterations to the principles of training and of the preparation of military personnel. A concept – aimed to solidify the defensive aspects of the way in which even the reserve forces were to be organised – emerged. The setting up of brigades was intended to strengthen defence capabilities along the borders of Hungary, albeit with the inclusion of only two brigades. Subsequently, the gradual downsizing of the military entailed the elimination of troops intended for deployment for the defence of designated areas. The training of reservists underwent a process of downsizing only to reach diminutive proportions. Among the reasons affecting the reservist situation adversely, it is possible to detect the worsening economic environment and the various
changes in the circumstances shaping security policy, along with new elements in the political interpretation of security. In 1997, Hungary, along with the Czech Republic and Poland, was invited to join NATO (Demeter et al., 2016, p. 22). Two years later, Hungary was granted full membership in that organisation (NATO Public Diplomacy Division, 2006, pp. 186–187). The accession of Hungary marked a new chapter both in the history of the country and in the history of the Hungarian reserve forces.

The Hungarian Reserve Component after NATO Accession

Hungary’s NATO membership has ushered in a new era of security guarantees and obligations. This, among other things, meant that the time for qualitative change in the armed forces had come (Csaba, 2002; Szenes, 2009). The capabilities of armed forces would need to be used outside Hungary’s borders as well (Ujházy, 2017). This was one reason why the idea of intensifying the ‘voluntary’ aspect of the armed forces gradually became part of the military’s agenda. A ‘modernised’ version of what used to be the ‘conscript remaining on active duty’ service option was introduced in the run-up to Hungary’s NATO accession known as contract-based active duty. Meanwhile, the initial steps on a bumpy road were taken to create a volunteer reserve system. It is a little-known fact that the concept of what was referred to by its name at the time – the volunteer reserve system – was given the go-ahead by the Military Council of the General Staff of the Armed Forces of the Republic of Hungary as early as 1999 (Hegedűs, 2019; Kádár and Vanyur, 2013; Kladek, 1999; Ujházy, 2017). A scheme to work out the details of a new system in which volunteer reserve personnel could be relied on was embarked upon in 2000. The introduction of the volunteer reserve system became all the more urgent because – among other reasons that could not be ignored – as a result of the gradual shortening of the conscript service to six months, the level of military training of conscripted service members leaving the service in 2001 was lower than during the period prior to these changes. Reservists called up for active duty in peacetime could only be deployed outside the borders of Hungary on a voluntary basis, which ran counter to NATO expectations regarding deployment. Initially, the number of volunteer reservists was set at 6000 (Hegedűs, 2019; Kádár and Vanyur, 2013; Kladek and Ujházy, 2014; Ujházy, 2017).

The government that took office in the spring of 2002 held the view that given the new security challenges worldwide, Hungary’s capabilities, and other factors referred to in this paper, it would be advisable for the country to transfer to an all-volunteer force as soon as possible. In November 2004, therefore, the Hungarian Parliament passed a new law on defence and on the Hungarian Defence Forces’ (HDF), and introduced amendments to certain sections of the Constitution of the Republic of Hungary. Accordingly, the entire system of conscription was suspended during peacetime (Szkely and Ujházy, 2017). Assignments to be undertaken as part of an international cooperation became a new, more immediate priority in setting out new guidelines for the HDF (Hegedűs, 2019).

In the context of the new, volunteer reserve system set up in the early years of the new millennium, we cannot overlook the fact that recruitment began in November 2002 (Kladek and Ujházy, 2014; Szűcs, 2002) without adequate financial resources having been allocated for the project. Most commanders and high-ranking officers were unable to fully grasp the significance of opportunities offered by the recruitment of volunteer reservists. This is one of the reasons why the issue of filling positions in the reservist structure lacked the attention it deserved, while resources needed for development were not provided either. Another reason why, in those days, the volunteer reserve system had to make do
with much less approval from politicians than today’s system, is that the armed forces at the time were not ‘in desperate need of’ volunteer reservists, given that conscription was still in existence; therefore, hundreds of thousands of trained reservists eligible for active duty were still available. During the initial stages of the reorganisation process, no self-restraint was exercised to allow for existing problems to be rectified. Instead, barely six months after the introduction of the new system, the process of filling the positions of volunteer reservist personnel was aborted in March 2003 under the pretext of an ongoing defence review, leaving nearly 200 volunteer reservists who had already joined up. With the reorganisation of the HDF, most of their positions eventually ceased to exist. This is how the number of volunteer reserves went down to under 20 by 2010 – the dawn of the new volunteer reserve system (Kladek and Ujházy, 2014; Ujházy, 2017). Meanwhile, the matter demanded more attention and the problem could no longer be downplayed. In 2008, Parliament passed a resolution to enact the revision of the volunteer reservist system of the HDF. The ensuing report was approved, setting the volunteer reserve component at 4000 service members (Kádár and Vanyur, 2013; Ujházy, 2017). Although the resolution by Parliament stipulated that an increased contingent should serve in the HDF, target levels were to be achieved only after a longer, ten-year period. Senior MoD officials who took office in 2010 got down to business with considerable energy; consequently, the volunteer reserve system was incorporated into the new Fundamental Law and the Defence Act, became a cardinal law (Ujházy, 2011).

An amendment, which came into effect on 1 January 2011, stipulated two versions of the reserve system. What was previously called ‘volunteer reserve service’ was re-named as ‘volunteer operational reserve service’, and a completely new service alternative, the ‘volunteer defence reserve service’, was introduced (Kádár and Vanyur, 2013). Later, other categories were added to the volunteer reserve component as we shall see further on. A more recent development is the commitment of neighbouring countries (the Czech Republic, Poland, Romania and Slovakia) to modernise their volunteer reserve services. The ability of countries to adapt to a new environment is manifested partly in their determination to supervise and upscale their military defence systems. Due to Russia’s well-known expansionist foreign policies, collective defence became, yet again, the focus of NATO’s attention, thereby reinforcing the eastern flanks of the North Atlantic Treaty Organisation. As part of the implementation of the new policy, the countries affected had to ensure that the policy was granted national approval. Commitment to achieving these new policy objectives would provide new perspectives for participants while casting a country’s territorial defence forces in a key role (Hegedűs, 2019).

It was as late as 2017 that a far-reaching change occurred when territorial defence subunits (companies) were set up in 197 districts nationwide. New subunits and the new volunteer territorial defence reserve system were alternatives capable of revitalising weakened bonds between the society and the armed forces all over the country by exploiting the potential of local and national patriotism (Székely and Ujházy, 2020). During a period of less than two years, almost 2800 individuals – most of them young – began their training scheme as contracted volunteer territorial reservists (Hegedűs, 2019).

Defence is a national issue; therefore, the stakes are high in trying to win over the civil society. In order to achieve a satisfactory level of integration into society, societal relations have to rely on an active bond not void of substance. Since the Cold War, relations between the armed forces and the society have changed considerably in Hungary (Simicskó, 2008; Ujházy, 2011). The old structure has disintegrated, the size of armed forces has shrunk and the kind of dialogue that existed for 136 years, due to conscripts
(and conscription-based reserves), no longer exists. A steadily growing number of volunteer reservists could play a significant part in the process of linking the HDF with society (Ujházy, 2011).

The current reserve structure of the HDF consists of two main components. The first is the volunteer-based component that is available in peace and in war and is the theme of this article. The second is based on legal obligations and is available only in a danger situation and in a state of emergency. Table 1 shows the current composition of the reserves in the HDF.

### Volunteer Defence Reserves

This employment relationship is unique in Hungarian Labour Law, but also in the world, as it means a double legal relationship. Becoming a volunteer defence reserve may only take place on the basis of a nomination from the Ministry of Defence Electronics, Logistics and Property Management Private Company Limited by Shares (MoD ED Co. Ltd.). In peace, the employee is an employee of MoD ED Co. Ltd., the HDF only appears as an employer during his training and after the call up. This reserve component is responsible for guarding and protecting military facilities in peace and in extraordinary situations (state of emergency etc.) and contributes to host nation support and disaster management tasks. The volunteer reserve service member – when not on active duty – is an armed security guard who performs the duties of guarding and protecting military facilities as a civilian (Hegedűs, 2019; Kádár and Vanyur, 2013; Kladek and Ujházy, 2014; Székely and Ujházy, 2017).

### Volunteer Operational Reserves

Volunteer operational reserves are probably the best trained reserves, who may be involved in any task of the armed forces. They are primarily placed in positions that are not prioritised or guaranteed to be replenished with regular personnel, but the necessary preparation for filling them is already needed in peace. They may be assigned to positions that have been vacant for a longer period of time or to replace service members serving in peace operations. Volunteer operational reserves may be called up to deal with special issues (e.g., response to natural and industrial disasters, border protection) or, with their consent, may deploy to peace operations, taking into account their military expertise, civilian training and suitability. Unfortunately, the most significant source of this reserve component currently is former regular personnel of the armed forces and armed law enforcement agencies (Hegedűs, 2019; Kádár and Vanyur, 2013; Kladek and Ujházy, 2014; Székely and Ujházy, 2017).

| I Component                                      | II Component                                      |
|--------------------------------------------------|--------------------------------------------------|
| Volunteer-based (in peacetime and in wartime)    | Based on legal obligations (in a danger situation and in a state of emergency) |
| Volunteer Defence Reserves                        | Trained Reserves                                  |
| Volunteer Operational Reserves                    |                                                  |
| Volunteer Territorial Reserves                    |                                                  |
| Special Volunteer Territorial Reserves            | Potential Reserves                                |
| Volunteer Military Service                        |                                                  |

Table 1. HDF reserves.
Volunteer Territorial Reserves

The aim of the formation of volunteer reserve companies in all districts of the country, organised on the principle of territoriality, is to have a trained, prepared, applicable force locally, if necessary.

During the training, the members of the territorial reserves receive knowledge that increases the defence capacity of the local community, be it in a national defence or disaster management situation. Since reservists can also have protocol tasks, their presence can raise the standard of festive commemorations at the local level as well.

The vast majority of these reservists are under the age of forty. The younger generation of volunteer reservists can also represent a pool of potential new candidates for officer cadets and NCO students, regular service members, as well as volunteer operational reserve personnel, as can be seen in other NATO member states that have had a longer volunteer reserve tradition (Hegedűs, 2019).

Special Territorial Volunteer Reserves

As of 1 July 2020, in response to the economic effects of the COVID-19 pandemic, a special form of volunteer reserve service was launched as part of the government's Economy Protection Action Plan. One of the undisguised aims of this new initiative was to enable the HDF, as one of the country's largest employers, to assist those citizens who have lost their employment. The training gives applicants the opportunity to earn a stable income while gaining defence and military knowledge. The six-month training can be either a longer-term volunteer reserve, a contract, or a ‘vestibule’ for career military service. The new form of service is mainly open to citizens between the ages of 18 and 50 who undertake to complete six months of training at the place of training closest to their place of residence. The special form of employment may be terminated at any time by mutual agreement. If, during special volunteer reserve service, someone decides to return to civilian life, they can do so without any adverse consequences.

This form of service is primarily recommended for those who undertake to perform tasks at a different level than their civilian education and quality, are open to receiving new knowledge, are connected to their local environment, and seek a temporary solution. Special volunteer reserve military service is the most flexible and special form of service in Hungary today. The training includes basic training, general infantry training and individual vocational training. After six months have expired, the special volunteer reserve service may be extended once for another six months, after which the service member may return to civilian life or take up another form of reserve service, or even become a regular member of the HDF (Benkő, 2020).

Volunteer Military Service

As of 1 September 2021, there is a new form of reserve service in the HDF called Volunteer Military Service. It is mainly aimed at young people who, for some reason, are forced to postpone the start of their higher education this year or want to try their hand at military service. Candidates willing to participate in the 2 + 4 months of this form of military service can take part in a training providing comprehensive national defence knowledge, which, in addition to gaining adventurous experience, also offers a stable earning
opportunity. In the first 2 months of the training, participants are entitled to the current minimum wage. Prior to the start of the second, 4-month cycle, the participant has several options. For the remainder of his/her service, he/she may remain with the territorial reserve unit where he/she will receive basic infantry training or change legal status (e.g. opt to become a regular service member). Consistent with the principle of voluntary service, the option also exists to terminate this contact and return to civilian life. Although the main target groups of the programme are young people over the age of 18 who have attempted to enter higher education but have not been admitted or have left public education institutions with or without a vocational qualification, this category is open to all Hungarian citizens between the ages of 18 and 65, regardless of gender (Hungarian Defence Forces, 2021).

A Possible Way Ahead for the Hungarian Volunteer Reserve Component

Since the end of the Second World War, armed conflicts have changed. Asymmetric, today more often hybrid, warfare has become an increasingly important form of conflict where the enemy is often waging war among the people, manoeuvring on the borderlines between parliamentary politics, street politics, criminal activity, and combat operations (Kiss, 2014, p. 26; Székely and Ujházy, 2020). This has also been the case in peace operations. A quote from former UN Secretary-General Dag Hammarskjöld describes the situation: ‘Peacekeeping is not a job for soldiers, but only soldiers can do it’ (Arbuckle, 2007). In most developed countries, the armed forces eliminate this contradiction partly by using volunteer reservists. These ‘citizen soldiers’ who work and live in both domains adhere to the values and ideals of a soldier for the state and a citizen of the state (Segal and Tiggle, 1997; Ujházy, 2011). A reservist is, to some extent, a service member and, in some measure, a civilian. Churchill referred to them as ‘twice a citizen.’ (Pengelley, 1995). Today, the number of military personnel making up the majority of the armed forces in NATO is more limited; reservists are very often selected on the basis of their non-military, professional skills and knowledge. These can be particularly useful in certain peace support operations: peacekeeping, peace building and humanitarian relief operations (Peace Support Operations, 2001; Ujházy, 2018; Weitz, 2007, pp. vii–ix).

It should not go unnoticed that security was, until recently, regarded mostly as a military and, to a lesser extent, political problem. This approach was more or less adaptable in the security climate of a bipolar world. After the Cold War, when the threat to peace and stability became an increasingly complex issue, more and more complex alternatives emerged in the approach to the problem itself. The economic, social and environmental aspects of security also became the subject of intense scrutiny (Buzan, 2008, p. 20). Today’s military operations have demonstrated that no effective crisis management operation can be run without a comprehensive approach in which political, civilian and military methods all have a role to play. Although traditional, purely military methods are perceived to be important, they alone fail to fight off the complex challenges that jeopardize international security. All methods of crisis management are vital. Therefore, the involvement of volunteer reservists who possess skills in areas such as the building and development of institutions, governance, security sector reform, or law and order, can significantly contribute to stabilisation and reconstruction (Ujházy, 2013, 2018).

Many of our allies have a long tradition of using volunteer reservists. While the regular component of an armed forces requires manpower, services often ‘re-recruit’ those that finish their regular service and offer them opportunities in the reserves. This offers two benefits to both parties. The service members returning to civilian life have the
opportunity to satisfy their desire to continue to serve the state, continue friendships with comrades in arms, and derive an economic benefit. The military retains a trained service member and can leverage the civilian education, experience, and non-military expertise these service members acquire. Many post–Cold War military operations, in addition to the normal skills associated with regular personnel, also require the non-military skills which the regular armed forces lack but that reservists have acquired and use (Molnár, 2012; Soeters, 2003, p. 265). Unique opportunities provided by reservists include cultivating better relations between the armed forces and society—a requirement in a domestic environment and a much needed form of cooperation during crisis response operations that address specific emergencies (Ben-Ari et al., 2008). It is also important that regulars and reserves should be regarded as elements bound together as parts of the same system, which would be a reasonable direction to follow as they are meant to accomplish the same set of tasks—to defend the country on behalf of which they operate.

**Summary**

It can therefore be concluded from the author’s research that prior to the end of the Cold War, the development and training of the Hungarian armed forces was in line with the requirements laid down by the Warsaw Pact for the building and maintenance of armed forces. Those requirements also served as a guideline for the structuring, direction, organisation, military equipment and the dislocation of armed forces. In the event of an offensive, Hungary was tasked with engaging its troops as a supplementary force to aid Soviet troops alongside other members of the coalition forces. The offensive nature of Hungary’s planned participation entailed the building of armed forces which were, in many respects, oversized in light of the accomplishable defence objectives.

Hungary’s NATO membership also opened up a new era of opportunities and commitments which, among other things, spearheaded the drive for qualitative change within the armed forces.

An increased number of reservists in the Hungarian armed forces, together with the transformation to a completely voluntary-based organisational model of the armed forces (all-volunteer force), clearly demonstrates that the issue of reservists in Hungary needs to be viewed from an entirely different perspective.

Despite the difficulties ahead, the outlines of a workable reserve system in Hungary are visible.

As is clearly demonstrated by international trends today, while personnel who formerly served in the armed forces as regular service members are still needed in the armed forces as reservists, it has become fairly obvious that today’s operational requirements necessitate non-military skills which, apart from having to be performed as part of a soldier’s duty during service, are not necessarily part of the repertoire of a traditional regular force. For this reason, reservists with useful civilian skills are becoming more relevant in modern armed forces, even if they have no background as former regular service members.

Reservists have a unique capacity to improve relations between the armed forces and society.

**Conclusions**

Prior to the end of the Cold War, the HDF developed and implemented strategy and training schemes aimed at building and maintaining armed forces capable of meeting
requirements set out by the Warsaw Pact. Structural elements, the concept of leadership, organisational principles, military equipment and the dislocation of the armed forces were also devised in accordance with those requirements. Hungary’s role was to supply troops that functioned as a supplementary force aiding Soviet troops alongside other members of the coalition forces. As a result, our armed forces were, in many respects, oversized.

Hungary’s NATO membership has ushered in a new era of security guarantees and obligations which, among other things, brought with it the realisation that the time for qualitative change in the armed forces had come. Among other changes, an initial shift of emphasis towards a reserve system – followed by the adoption of the all-volunteer force model – made it clear that a new basis had to be provided upon which to address the reserve issue in Hungary.

International trends today demonstrate that while the armed forces rely on the military skills regular personnel acquire during their service, today’s operational requirements necessitate a number of non-military skills which are not necessarily part of the repertoire of a traditional regular force. Reservists have often acquired these skills through their civilian education, experiences, and work expertise. These reservists have unique skill sets, perspectives, and potential that the armed forces can exploit to meet state, coalition, and treaty requirements. Additionally, these reservists have the unique capacity to improve relations between the armed forces and society. This is of particular value in countries where conscription has been suspended, thus conscripts no longer perform this role. The author proposes that regulars and reserves should be regarded as elements bound together as parts of the same system, which would be a reasonable direction to follow as they are meant to accomplish the same set of tasks – to defend the country on behalf of which they operate.

The findings of this study corroborate the assumption that, notwithstanding Hungary’s teething problems encountered in the process, a workable volunteer reserve system is in the offing. This analysis has drawn attention to several questions that could provide a suitable basis for further research on reserve components, which might include a comparison of the Hungarian practice with those of other countries with particular emphasis on which of these could perhaps be considered most applicable to Hungary.

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