

A journey through small state governance

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Abstract: The structures, behaviours and problems of governance in small states have always fascinated me. I attribute this fascination to the fact that I began my career of teaching and research in public administration in Tasmania, Australia's island state with its population of around half a million, and then had many opportunities to compare and contrast the Tasmanian system with those of other small and many much larger jurisdictions. Continuing that career in the Australian Capital Territory, a 'quasi-state' even smaller in population terms, provided other such opportunities and challenges. Drawing on this research experience, this paper looks first at the relationship between statehood and size. It then considers how a number of governance issues mostly related to structuring and operating the executive and legislative branches of government have been affected over the years by the smallness factor. The illustrations come mostly from jurisdictions that would loosely be regarded as belonging to the family of Westminster-style governments, however much that style has been adapted to accommodate the factor of smallness

Keywords: governance styles, microstates, small states, small size, sovereignty, statehood

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Introduction: The relationship between statehood and size

The relationship between statehood and size has always been ambivalent. Whatever connotations the notion of statehood has brought with it over the centuries, it is obvious that some of them have been shared by all states whether large or small. Equally obviously, however, small states have had some characteristics distinguishing them from the general run of (usually rather larger) states.

It may come as a surprise that the conclusion Aristotle drew from his comparative study of the many Greek city-states (*polises*) existing in and around the third century BC remains even today an appropriate introduction to the study of small state governance:

In large states, it is both possible and proper that a separate magistracy should be allotted to each separate function ... In small states, on the other hand, a large number of functions have to be accumulated in the hands of but a few persons... It is true that small states sometimes need the same magistracies, and the same laws about their tenure and duties, as large states. But it is also true that large states need their magistracies almost continuously, and small states only need theirs at long intervals. There is thus no reason why small states should not impose a number of duties simultaneously on their officers... [and] it is necessary, where the population is small, to turn magistrates into jacks-of-all-trades (Aristotle, in Barker translation 1946, pp. 195-196).¹

¹ Aristotle's concern with problems of coordination in complex governance systems – leading towards a theory of departmentalisation – was noted in March & Simon (1958, p. 22).

There have always been small states functioning alongside, and in various sorts of relationships with, larger ones. From the time of Aristotle until fairly recently, however, their governance styles and problems have not attracted much serious study. But that study has been developing as a subfield of public administration as the number of such states has grown dramatically over the past couple of generations (Thynne and Wettenhall, 2001). The subject communities have mostly, of course, long existed: what is new is that many of them have acquired the institutions of statehood as part of the break-up of empires in the period of post-World War II decolonisation and, as small statehood has thus become better understood, other oddities such as the proverbial ‘little countries of Europe’ – Luxembourg, Monaco, Andorra, San Marino and Liechtenstein (AGS, 1969) – have also been recognised fully as states in their own right, often running to United Nations membership.

In 2017, there were 193 members of the United Nations, 38 of them having populations of less than one million (Wikipedia, 2017a). The Commonwealth of Nations that has emerged from the old British Empire also has many of them, its 52-state membership in late 2007 including 22 with populations of less than one million (Wikipedia, 2017b). And these figures include only those with full formal sovereignty. When ‘quasi-states’ with meaningful self-governing systems, such as the associated states of New Zealand (Cooks, Niue), China’s ‘special administrative regions’ (Hong Kong, Macau), or provinces and cantons within federal systems, are added, the number of small states is much larger.²

Though it is only one of several possible defining characteristics, the population criterion has been used in many studies: it accepts that the category of small states generally includes only those with populations of one million or less (see discussion in Raadschelders, 1992, p. 27). This is the criterion I use here.

But it needs to be acknowledged that ‘small’ is a relative concept: it all depends on what the small unit is being compared with. Political scientists pursuing other interests can easily describe the Scandinavian states, Estonia, Australia, New Zealand and even Greece as small (e.g. Schwartz, 1994; Clesse & Knudsen, 1996; Goetschel, 1998); they are so in relation to e.g. the US, France, Germany or Russia. Uruguay, described as ‘the world’s first country to fully legalise the production, sale and consumption of marijuana’, has recently been called ‘this small South American nation’ (Miroff, 2017). Humorous travel writer PJ O’Rourke described even front-line states like Germany, Italy and Spain as ‘Euro-weenies ... dopey little countries and all their pokey borders’ (O’Rourke 1988, pp. 193, 194).

At the turn of the century, an elected member of the Mongolian parliament classified her country (with 2.4 million people) as a ‘small jurisdiction ... although geographically large’ (Oyun, 1999). While it does not qualify under the criterion used here, this example draws attention to the fact that some states and territories that may be small in resident population are nevertheless large in land area. These include Greenland emerging from the status of a Danish colony; the (fairly new) self-governing Inuit territory of Nunavut within the Canadian federation; and Australia’s (rather older) Northern Territory.

² The Australian Capital Territory justifies inclusion in these terms, even though – because it is also the federal capital – most Australians assert that it must never become a ‘state’ in the formal Australian constitutional sense. I have described it, for Australian purposes, as a ‘quasi-state’ (1998a), though it seems appropriate to point out that the domestic jurisdictions housing two other federal capitals (Vienna and Berlin) are treated as full states within their own systems (Rowat 1991, pp. 29, 33).

Applying this criterion of smallness, Raadschelders uses 1987 data to list 32 small states enjoying full sovereignty, 20 of them natural islands (1992, p. 30). However, the editor of the book in which her discussion appears presents a list which is much larger because it also contains non-sovereign territories (Baker, 1992, pp. 12-13). Baker acknowledges that he includes both 'internally self-governing territories and territories that remain dependent' (p. 11). Neither list, however, includes 'states' (also known as provinces, cantons or prefectures) in federations, many of which have highly developed governmental systems with wide-ranging functions, and some of which actually assert claims to sovereignty.

At the other end of the small spectrum are the so-called 'micro-states', demonstrating again that it is all relative. This term has been used to denote three very small Pacific states with populations of under 10,000 (Wettenhall & Thynne, 1994). Maltese scholars see their own country in this light (Pirota, 1996) though, in Pacific terms, Malta is relatively large; thus Warrington (1994, p. 130) refers to *all* states of under a million people as micro-states. Elsewhere, I find Singapore and Estonia described as 'tiny' (Lee, 1993; Abjorensen, 1998): Palauans, Nauruans and Tuvaluans are likely to be amused.

There is, finally, a tendency to regard all city-states as small, because they are small in area (e.g. Singapore again, Hong Kong, or the city-states within the German federation) – their populations may, however, run to several millions. Of course, precepts from some that are only relatively small may sometimes be useful in expanding understanding of problems and needs in the really small (e.g. Quah, 1999, on corruption).

My research and teaching career in public administration gave me many opportunities to learn about, and quite often to visit, small states around the world as I developed teaching courses, built up my stock of teaching materials, participated in academic conferences, availed myself of study leave opportunities, and did the dozens of other things that become a part of the academic life-style. Of particular value to me were memberships of international public administration associations that focused particularly on the post-World-War-II emergence of new states out of the old colonial empires. There were several such associations, including the Brussels-based International Association of Schools and Institutes of Administration (IASIA) and the Manila-based Eastern Regional Organisation for Public Administration (EROPA). Much more recently, as I entered into semi-retirement, I discovered another such body developing with a particular interest in islands of the world, especially small ones, with governance issues standing as one of many pillars of its concerns: the International Small Island Studies Association (ISISA), which has enriched the understandings I brought with me from my earlier studies.

The notion of statehood itself requires some reflection. As suggested above, there are (a) what might be considered as 'pure' (or 'complete') states, however big or small, with full sovereignty in a constitutional sense; and (b) states less than pure in that sense, which I have termed 'quasi-states' (which includes many of the 'micro-states'). The quasi-states will be subordinate in some way to one or other of the pure states, but will themselves have reasonably well-developed government structures and functions recognised in some sort of constitutional instrument. The word 'state' comes easily to cover both groups, and I have used it in this way in the title of this essay. But, if they are islands, my quasi-states fit the category of 'sub-national island jurisdictions (SNIJs)' which has emerged in the terminology developed by Godfrey Baldacchino and his research collaborators (Baldacchino, 2006, 2010; Baldacchino and Milne, 2009). Throughout this essay, the term 'jurisdiction' is used from time to time when dealing especially with quasi-states within a general discussion of statehood issues.

Tasmanian launching pad

When I commenced the formal study of public administration at the University of Tasmania in the 1960s, I was taught by lecturers with a mix of experiences relating to the British and Tasmanian administrative systems, and I was already employed as a cadet in the Australian Commonwealth public service where I had been acquiring knowledge of that system. Two lines of comparative inquiry emerged: the first seeking to understand similarities and differences between the British and the general Australian traditions, the second provoking a deeper delving into similarities and differences between the Australian Commonwealth and Australian state systems and between the systems of the several Australian states.

All were Westminster-style systems, but it was soon apparent that this was a broad category that permitted major variations within, attributable to the circumstances of history as well as to differences of scale. The Commonwealth system began life fully formed when the Australian states federated in 1901, whereas the British and Australian state systems were both products of a longer evolutionary design process – though of course shorter in the Australian state than the British case. From this appreciation, the realisation came fairly quickly that it would be useful to extend the inquiry especially to other small systems ‘emerging from the British imperial tradition’ (Braibanti, 1983), many of them sharing with Tasmania the experience of evolving towards self-government and statehood within the broadly understood Westminster pattern of parliamentary government. Of course, not all such systems qualified as small or as islands: it was the Tasmanian base for my inquiries that leaned me towards smallness and ‘islandness’.

Especially significant for the comparisons I wished to draw between colonial systems moving to self-government were the changes that occurred in 1856 in Tasmania, up to that year known as Van Diemen’s Land, since 1901 a member state of the Australian federation, and with a current population of around 520,000 (2016 figures). An apparatus of functionally differentiated units had gradually emerged from the time of first British settlement in 1803-04 (initially in separate south and north counties)³ and the formal separation from the mother Australian colony of New South Wales in 1825. Soon described as departments, these small units accounted directly to the colonial governor or, in a couple of cases, directly to their opposite numbers in London. In 1856, the establishment of a system of responsible government formally attuned to Westminster principles converted the head offices of the main departments into ministerial offices with responsibility direct to a reformed Tasmanian legislature. However, not all the departments were so affected, leaving a non-ministerialised residue and so unleashing never-ending speculation about the organisational character of the department and about the various agencies that escaped direct ministerial control. In effect, an overlay of political officers (the ministers) had been added to the administrative arrangements, whereas much of the system continued as before, not much changed, with public service lists developed that largely ignored these questions. Ongoing confusion has resulted from the failure to synchronise the ministerial/cabinet and public service components of the administrative system, leading to the conclusion that classic Westminster norms never had much bite in the Tasmanian case (Wettenhall, 1967; 1986, chs. 2-4).

³ There was an earlier-established indigenous population, but it was tribal and nomadic in character and had not developed an organised system of governance.

Comparisons

My comparisons went in three directions. First, they showed that, while their experiences may have differed in detail, all the Australian states had generated similar ambivalence as they moved to self-government along with Tasmania in the 1850s (Western Australia 1890), before the principles of ministerial government had become well understood.

Second, they showed that the Australian Commonwealth system established at the beginning of the 20th century was starkly contrasted: its designers were operating from scratch, with no pre-existing administrative machinery to absorb,⁴ and at a time when Britain could be observed basking in the heyday of ministerial government, with the principles of that system now clearly understood (Schaffer, 1957; Wettenhall, 1986, ch 2). A primary feature was therefore the general alignment of the ministerial and public service components of the Commonwealth system. Thus, whereas South Australia (the state with the most extreme dis-connection) could, by around 1960, boast 52 public service departments against 8 ministers, in the Commonwealth 22 ministers faced just 24 departments whose titles corresponded with those of the directing ministers (Wettenhall, 1986, chs 2-3).

The South Australian case was, however, instructive in another way. Ministers facing such a cacophony of departments needed a coordinating secretariat, and that was supplied by creating separate departments entrusted with providing ministers with portfolio-wide views of their responsibilities. Similarly in New South Wales, the need for coordination was recognised by the establishment of public service units described as ‘ministries’.⁵ Usually, there were pleas that portfolios should be consolidated by bringing together a minister’s areas of departmental responsibility in a single portfolio-matching department in the fashion familiar after creation of the Commonwealth system in 1901, but these pleas were mostly ignored (Wettenhall, 1986, chs 1, 6).

Modes of ministerialisation

My third quest for comparisons took me looking outwards from Australia and is of particular relevance to my developing interest in small states. A series of brief visits in the later 1960s and early 1970s to several former British territories in Africa, the Indian Ocean and the South Pacific, many of them relatively small in size, and associated reading, provided the opportunity to gather data on the extent to which structural change in the administration accompanied transition to self-government and/or independence, and confirmed my supposition that the processes I had observed in the Australian colonies were repeated in many such situations. Island territories in this exercise included Mauritius, Fiji, Singapore, the Cook Islands and (later) the Seychelles and Papua New Guinea, but I included additional data from Sri Lanka, Tanzania and Nigeria (not so small!). From these data, I concluded that the decolonising movements of the 19th and 20th centuries reflected a need for departmental consolidation in order to assimilate the public services to the new style of cabinet/ministerial government, but that this need was often recognised too slowly or scarcely at all. This was because the concerns of the self-government/independence movement, being predominantly political, failed sufficiently to consider the administrative implications of political change, with the result that some of the momentum of the political movement itself was lost. The 1961 lament of one Sri Lankan (then Ceylonese) minister drew stark attention to the problem:

⁴ As part of the federal settlement, it did of course have to absorb sections of the state public services. But that was done within the new framework established for the Commonwealth bureaucracy.

⁵ The variety of ways in which the term ‘ministry’ is used is discussed in Wettenhall (1986, ch 1).

Twenty-one departments are too many for even the ablest and most energetic Minister ... He [sic] cannot give his personal attention to directing policy (cited in Cader, 1975, pp. 98-99).

I concluded further that it was possible to view the stages of ministerialisation actually achieved or potentially attainable in new states advancing from colonial dependency as forming four principal modal points on a spectrum. The *first* (most primitive) mode is represented by systems which have retained an older apparatus of administrative departments and made little serious attempt to adjust them to the fact of ministerial government, so that the number of departments is likely to be considerably in excess of the number of ministers, the departmental titles are unlikely to correspond fully with portfolio titles, and the ministers will lack portfolio-wide coordinating and secretarial services to assist them in their work. In the *second* mode there is some limited effort to integrate the area of administration forming a minister's jurisdiction, through the establishment of a general secretariat to serve the minister; nevertheless the departments and their permanent heads are not greatly disturbed, and therefore remain in a strong position *vis-a-vis* the secretariat. The *third* mode goes considerably further in the direction of consolidation, in that, although the departments continue to exist as distinct and recognisable entities, they become clearly subordinate to the coordinating secretariat; and the permanent secretary, as the minister's principal adviser, will be found at secretariat level only. In the *fourth* and final (most advanced) mode, the whole area of jurisdiction of the minister (excepting only the corporations and other arm's-length bodies, about which more below) is formed into a single department: the words 'department' and 'ministry' become interchangeable, and the units regarded as separate departments in the other modes appear only as bureaux, branches, divisions or sections (Wettenhall, 1976; 1986, ch.8).

This finding reflected my broad interest in machinery-of-government issues and was not size-dependent except that, from the jurisdictions I had studied, it seemed that larger jurisdictions were more likely to have advanced to the fourth mode. The modes were of course patterns, and within patterns there could be points of difference from case to case. Here, an observation from University of South Pacific professor David Murray reinforced differences I was noting. He advised those working on the design of administrative systems for small states to avoid simply trying to copy the systems of larger associated states. Small states, he advised, should adopt a strategy of 'scaling down the prescriptions and enlarging the actual administrative situation': thus, the number of departments could be 'scaled down' and the work of each 'enlarged up' (Murray, 1977, p. 572).

With former University of Canberra colleague Ian Thynne, I looked particularly at some of the smallest Pacific Island states to observe how well they had innovated in fashioning their systems to adjust to this requirement. Nauru, Niue and Norfolk, with populations of under 10,000 and lacking in provincial 'away-from-the-centre' concerns, were cases in point. In each, the systems operating in Australia and New Zealand as the relevant 'metropolitan powers' were followed, but in simplified form. This 'test' had much value as the circumstances of other small island states – or, more appropriately, jurisdictions – were considered (Thynne, 1981, 1996; Thynne and Wettenhall, 1996, 2001; Wettenhall & Thynne, 1994; more on Norfolk Island below).

Thynne had moved to Hong Kong – small in area if not in population – around the time of that jurisdiction's shift from the status of a British crown colony to that of a Chinese 'special administrative region' (or 'SAR'), and its administrative machinery was considered

in terms of its standing on an integration-autonomy spectrum. There are positive and negative consequences for each position, integration making cooperative interaction but subjugation more likely, autonomy making dynamic self-government but isolation more likely. It was clear this factor needs to be taken into account in addressing the top levels of the government hierarchy in cases such as that of Hong Kong, where the constitutional situation is available for deliberate design. It is relevant more generally, in all sorts of countries, in designing the layers beneath the top level which position ministries, departments, agencies and so on in relation to each other. The implication here is that an apparatus of mode-4 ministry-departments ought to aid the smooth working of cooperative interaction, whereas lower modes are more likely to produce dynamic management of particular functions (Thynne, 1998; Thynne & Wettenhall, 2001).

The question of executive-legislative relations

Of the sub-national island jurisdictions I visited, Bermuda turned out to be a surprise packet, and for me it promoted some interesting connections. Bermuda claims to be one of Britain's oldest self-governing colonies: its legislature dates back to 1620, and now, nearly 400 years later and notwithstanding its emergence as a major international financial centre, it joins some other members of the various 'imperial traditions' in refusing to allow itself to be cut adrift from its 'mother country'. But what interested me mostly was how its machinery of government had developed: for over 300 years that machinery had consisted mostly of so-called independent boards made up of members of the legislature and responsible directly to that legislature. A conventional ministerial system did not come about until the 1960s (Wettenhall, 1975).

Bermuda was not the only jurisdiction to exhibit this attachment to boards made up of legislative assembly members to head units of the public service; but it was the one that initially caught my attention. Others included some older British West Indian colonies, and the self-governing island jurisdictions off-shore from Britain itself: Jersey, Guernsey and Isle of Man. In all these cases, the processes of democratisation eventually (sometimes much later) led to the formation of systems of responsible government, with ministers replacing the boards as departmental chiefs. But the 'discovery' of the Bermuda case took me in two different directions. First, it bolstered my interest in the non-ministerial forms which usually supplement departments in the workings of systems of public administration: this interest was reflected in my doctoral research and for subsequent research projects on arms'-length bodies; but it was not closely related to my work on the governance of small states. And second, it opened up links with other small jurisdictions, notably those of the Australian Capital Territory (ACT) where I was now living, and Jersey in the Channel Islands.

Though not surrounded by sea as is Tasmania, the ACT, with a population of around 450,000 (2017 numbers), is itself small and surrounded by the territory of another state – New South Wales – and so not unreasonably can be thought of as an 'administrative island' (Wettenhall, 1998b). From the 1970s on, I found myself becoming actively involved in a strong campaign seeking to convert a totally dependent (on the federal bureaucracy) system of governance into a system falling short of statehood in the Australian federal sense but nevertheless possessing many of the characteristics of that statehood. This campaign succeeded in major respects, so the ACT became a 'quasi-state'. Along the way, however, and seeking to avoid this 'solution', some federal ministers proposed that boards and commissions – not ministers – should be set up to control the ACT's major public services and that community representatives should be appointed to each of them (Wettenhall, 1975, pp. 178-180).

The 1988-89 settlement went much further, and was at the same time more conventional by late 20th century standards (see Oakes and Reeder, 1991 and Grundy et al., 1996 for the story of this campaign). The ACT acquired a small parliament of its own (Legislative Assembly), its own electoral system, government, public service (out of the Commonwealth service, with departments organised on mode-4 lines), and judicial instruments. However, the electoral system has usually returned either minority governments or coalitions, and this has led to suggestions – reviving the debates of the 1970s – that the departments should be headed by multi-party committees of the legislature rather than single ministers. A surprising connection with the board governance system on Jersey in the Channel Islands resulted, provoked by an exchange of visits with Jersey Senator Ralph Vibert who had had much involvement with Jersey's legislative boards.

In 1994, there were 18 such 'executive committees' in the Jersey legislature, which had 53 elected members. They mostly campaigned as independents rather than as members of a political party, and when elected many of them were members of several committees. There was no cabinet, the system postulating that the assembly itself was the collective head of government. Civil service departments reported directly to the corresponding committees, and coordinating committees for finance and establishment assisted the assembly in its direct regulation of the total system (Vibert, 1990; Vibert & Wettenhall, 1994).

There were elements of this system in other island states emerging from the British imperial tradition, notably Bermuda (as already noted), Sri Lanka (then Ceylon: Jeffries, 1962), Guernsey (Loveridge, 1975), Isle of Man (Kermode, 1979), Seychelles (Allan, 1982) and the Channel Islands generally (Massey, 2004). They were all quite small jurisdictions, raising questions about whether such jurisdictions had better capacity than larger ones to innovate in machinery-of-government matters. However, there has been fairly general movement: early in Ceylon; much later in the Isle of Man and Jersey (Walker, 1989; Wikipedia, 2017c) away from such committee-style government and towards more conventional ministerial systems,⁶ and ACT governance came also to follow a more orthodox pattern of single-minister departments now called 'directorates'.

Australia's Northern Territory, large in area but small in population (about 250,000 in 2017), shared some governance characteristics with the ACT. In 1978 it gained its own small legislature, a cabinet of ministers with departments reporting to them, and other manifestations of a quasi-state system. The enduring ministerial-system problems that arose in both the Northern Territory and the ACT had to do with the small numbers of parliamentarians: up to 1983 in the Northern Territory case, for example, how to provide a six-member cabinet, an adequate government backbench and a workable opposition from the 19 available MPs? This is a problem likely to be faced in most small jurisdictions: in the two Australian territories, wrestling with it has led to the enlargement of the legislatures and hence the pool of MPs available to cover the needed functions.

Through the 1970s and '80s, there was much discussion in Australia about the possibilities of reconstructing the federation to include a larger number of state units more nearly equated in size, and at this time – and in the dawn of ACT and Northern Territory quasi-statehood – there were serious suggestions that those new systems of governance might provide a model for many more new federal states of the sort envisaged, possibly recognised as 'regional governments' (Power & Wettenhall, 1976, pp. 124-125). This, of course, did not

⁶ I thank Roy Le Herissier for information on the move to ministerial government in Jersey.

happen, and my particular interest moved to developments in an off-shore territory: Norfolk Island.

Connections with ‘metropolitan’ powers

Norfolk is a mountainous speck in the Pacific Ocean, around 1,800 km east of the Australian mainland coast and with a resident population hovering at around 2,000. Its dramatic history includes an early period (from 1788) as a secondary convict establishment and (from 1856) as a home for a resettled population from even smaller Pitcairn Island, made up of the surviving *HMS Bounty* mutineers and their Tahitian followers. The Pitcairner tradition became very important as Norfolk’s future unfolded.

Through the second half of the 19th century, Norfolk was administered as a separate British colony sharing a governor with New South Wales (NSW) and by a small group of NSW officials. In 1913, with NSW now a state of the Commonwealth of Australia, Norfolk’s status was changed by British and Australian Commonwealth legislation to that of an Australian external territory, and an administrator was appointed to head the small government establishment on the island. But Australian official quarters proved reluctant to recognise the desire of the Norfolk community for a substantial degree of self-government and, after World War II, when it began to develop tax-haven characteristics, there was pressure to regulate its affairs more closely.

A royal commission inquired into its circumstances in the 1970s and, after several compromises on the part of the federal parliament, it was advanced to a form of self-government with its own small parliament, its own electoral system, a cabinet of ministers, a public service reporting to them, and some other trappings of statehood: effectively, a very small ‘quasi-state’. But the Commonwealth bureaucracy was unhappy with this arrangement, and there were several attempts to bring it into line with the mainland electoral, tax and welfare systems (Nimmo, 1976; Grundy & Wettenhall, 1977; Wettenhall & Grundy, 1992). In the early 21st century, the form of governance again came under serious review, with the Commonwealth determined to remove Norfolk’s self-government and Norfolk interests fighting strongly but unsuccessfully to avoid a downgrade of its governance status. Along with Christmas Island and the Cocos Islands, Australian off-shore territories in the Indian Ocean, it found itself restructured effectively as a local government in the municipal system of one of Australia’s federal states (Stanhope, Wettenhall & Bhusal, 2015; Wettenhall, 2016).

Norfolk fitted the category of ‘sub-national island jurisdictions’ (SNIJs). I had been employed in the early 1990s, with journalist colleague Phillip Grundy, as a consultant to the Norfolk Island Government in its fight against stronger Commonwealth intervention, and had developed a keen interest in such jurisdictions. My coverage included many SNIJs emerging from the British imperial tradition, but was especially important for me because it also included islands representative of the French, Dutch and other colonial imperial traditions. I had soon come to see that I needed to travel more widely in my explorations. Tasmanian origins had provided a useful start, but the world had much more to offer!

In reviewing an important text (Aldrich & Connell, 1992; Wettenhall, 1993), I recorded two personal experiences that alerted me particularly to the very different arrangement that had developed in the old French colonial network. The first occurred as I was flying in a small passenger plane between Barbados and St Lucia in the Caribbean. I knew the plane was flying on to other islands in the Caribbean after St Lucia. A coloured woman with good English and dressed rather as a bureaucrat sat beside me, and I asked her

what her destination was. She replied: 'France'. 'Oh!', I said, 'where do you change for the cross-Atlantic flight?' She gave me a withering look – I was obviously a Caribbean ignorant – and replied: 'I don't!' A little later I plucked up courage and resumed the conversation. It turned out that her 'France' was Martinique, the next island in the chain. She had lived in the Caribbean all her life, and had never been to Europe. But European France, she explained, kept her island abundantly supplied with all things French, so that she believed herself fully equal to citizens of metropolitan France, and was proud to call herself French.

The second: a Christmas message from an American friend told me that he and his family had had a driving holiday that took them to three countries: from the US, through Canada, to France. Did they drive across the Atlantic? Not a bit of it. Their France was St Pierre et Miquelon, two islands a few kilometers off the Newfoundland coast and connected to it by vehicular ferry.

These exchanges led me to look more closely at the French arrangements, and it became clear that over a dozen territories around the world under French sovereignty existed in this way. They had their own governments and electoral systems and, unlike SNIJs emerging from the British tradition, they were also directly represented in the metropolitan parliament. In populations, they ranged from around 860,000 (Réunion in the Indian Ocean) to just over 6,000 (St Pierre et Miquelon in the Atlantic). New Caledonia was separately arranged following a violent pro-independence uprising in the 1980s, and after a political compromise awaits a future constitutional settlement (Aldrich and Connell, 1992, ch.8).⁷

These French dispositions are unusual in today's world. International post-colonial history has usually followed a fairly regular two-directional path. In the first, through to about 1984 and beginning with the case of Iceland (representing the Danish imperial tradition) receiving its independence in 1944, there was a steady procession of former colonies benefitting from the attentions of the United Nations Decolonisation Committee (the so-called 'Committee of 24'), acquiring full sovereignty, and moving out of the old empires. In the second, however, from about 1984 the remaining former colonies have showed considerable reluctance to accept independence, notwithstanding the wish of their colonial masters; through numerous referendum exercises, they have voiced a preference to remain formally associated with their former masters in ways that bring economic and other tangible benefits. Another scholar of small states employs the category of 'partially independent territories' to cover such arrangements, noting that these may furnish important capabilities, leading more easily to wealth and security than full independence (Rezvani, 2014).

These are examples of 'island sub-nationalism', or 'autonomy without sovereignty' (Baldacchino, 2004; Baldacchino & Milne, 2009). Bermuda (already noted), Gibraltar (almost an island), the Caymans and British Virgin Islands, St Helena, the Falklands and others not mentioned in this essay are cases-in-point out of the British imperial tradition. Thus, in his account of travels through 'the torrid zone' (the tropics), Alexander Frater shows how determinedly Anguillans campaigned against Britain's desire to unload them, and how winning that campaign brought them many benefits (Frater, 2005, pp. 271-274).

⁷ Aldrich and Connell (1992) offer a major account of the system that France has provided for its overseas territories. In another book significant to small state studies, they have examined the remaining colonies in the dwindling empires, and provide an excellent source of information about territories missed in my journey, such as the cases of the Spanish enclaves of Ceuta and Melilla on the Moroccan coast (Aldrich & Connell, 1998).

A somewhat more complex example is provided by the collection of Dutch Caribbean islands out of the Netherlands imperial tradition. Indonesia and Suriname, neither of them islands (though Indonesia has plenty of them, of course), had gained their sovereign independence in the first decolonising wave. The Dutch Caribbean islands experienced change but not independence in the second wave. They fall into two groups, northern and mostly English-speaking, and southern and mostly Dutch-speaking, each comprising three main islands and one of them, Sint Maarten in the north sharing its island with the French territory of St Martin. Curaçao was long seen as the lead island, and in the 1800s the others were governed as its dependencies. But that was not generally popular, and the Netherlands government made several unsuccessful attempts to organise the islands into a Dutch Caribbean federation. In constitutional settlements in the earlier 20th century, Curaçao and its dependencies became an integral part of the Kingdom of the Netherlands known as the Netherlands Antilles. In the context of marked differences between the islands, the ‘kingdom’ aspect had more bite than any attempt to federate.

Through the 1970s and early ‘80s, the Dutch government saw independence as the best solution to on-going relationship issues, but it was repeatedly thwarted in securing that goal, not least by a series of island referenda. In 1986, Aruba separated from the Netherlands Antilles as a political entity, and was recognized as a distinct ‘country’ within the kingdom. That model proved popular: when, in 2005, all islands were asked to exercise their right of self-determination, Sint Maarten and Curaçao chose autonomy as separate ‘countries’ within the kingdom, like Aruba. Saba, Bonaire and St Eustatius chose instead to join the Dutch metropolitan local government system, and so became part of the ‘country’ of the Netherlands. As from October 2010, the entity known as the Netherlands Antilles was wound up. The Kingdom of the Netherlands now consists of four autonomous constituent countries, three of them in the Caribbean. The three Caribbean special municipalities are part of the European Netherlands (Kersell, 1994; Veenendaal, 2015; Tange, 2017).

There are other former-empire networks that include island jurisdictions with varying degrees of local autonomy, the cases of Denmark (the Faroes and, with large area but small population, Greenland), Finland (the Åland Islands), Portugal (Azores, Madeira), Spain (Canary Islands) and the US (American Samoa, Guam, Northern Marianas, Puerto Rico, US Virgin Islands) coming easily to mind. Governance arrangements differ from one to the other; their study is an important part of the ISISA mission.

In some cases, the SNIJ may be a full and co-equal federal state, such as Hawai‘i (in the USA), Prince Edward Island (in Canada) and Tasmania. In some, it may be an ‘associate state’, dissolvable by either party acting alone on terms established in a constitutional document or treaty, as with Niue and Cook Islands in relation to New Zealand; in others it may be a regular province of the associated nation-state, as Galápagos is to Ecuador. In yet others, as with the new status of three of the Dutch Caribbean islands, it may be a nearly-regular component of the nation-state’s local government system. In the Australian case, the three off-shore SNIJs, Norfolk, Christmas and Cocos, have had all pretensions to a degree of self-government removed, with their status now ‘demoted’ to that of a local government within the municipal system of one of the federal states.

What matters in comparing the constitutional arrangements of SNIJs is the degree of autonomy they enjoy in their relationships with their central powers, and measuring autonomy involves judging degrees of autonomy against degrees of partnership between the island jurisdiction and those powers. Where a reasonable degree of autonomy is wanted by the SNIJ, maximising available autonomy options will require that the SNIJ is able to

demonstrate good ‘para-diplomacy’ capacity, and this requires strength in its own governance arrangements (Bartmann, 2009; Watts, 2009).

From islands to land-locked jurisdictions

This account of my journey through the governance arrangements of small states has focused mainly on island jurisdictions. As noted, a few coastal tracts with large hinterlands – such as Greenland, French Guiana and Australia’s Northern Territory – have revealed similar characteristics. And it may be assumed that land-locked jurisdictions emerging from similar imperial traditions will mostly share such characteristics: thus Botswana, Lesotho, Swaziland, Zimbabwe and Uganda may be expected to have behaved broadly, in basic machinery-of-government terms, in the same way as their island cousins from the British tradition.

From the early days of my travelling, however, I have been aware of another group of small but (with one exception) land-locked jurisdictions not coming out of the same imperial traditions but requiring to be fitted into the small states story. These are the so-called ‘little countries of Europe’ (AGS, 1969), which – if we exclude the Roman Catholic church state of the Vatican City (or Holy See), whose ecumenical basis removes it from comparability with all the others – number five: Andorra, Liechtenstein, Luxembourg, Monaco and San Marino.

Luxembourg is the largest of the five, with a 2016 population of just over half a million, a little more than Tasmania, with an area of 2,586 km². Andorra is the next largest, with about 70,000 people in 468 km². The rest are smaller: Liechtenstein: some 37,000 people in 160 km²; Monaco: also some 37,000 people, but in only about two km²; and San Marino: about 32,000 people in just over 60 km².

Except for republican San Marino, all have monarchical styles of government styled loosely as principalities in the Andorra, Liechtenstein and Monaco cases and grand duchy in Luxembourg. Andorra has joint princes serving as head of state, the President of France and the Catholic Bishop of Urgel, a neighbouring Spanish province; in the others, princes or a grand duke serve as heads of state. In San Marino, the legislature elects two Captains Regent who serve jointly as both head of state and head of government. There are other unusual features in the governing arrangements, but electoral systems ensure that all governments are broadly representative of their peoples. All five are members of the United Nations in their own right; while Luxembourg is a member state of the European Union (EU).

Unlike many of the island states and quasi-states, these land-locked states (and Monaco) have sound economies, operating variously as financial centres (sometimes with tax-haven status), with gambling (notably Monaco’s casino) and tourist enterprises flourishing. Remarkably, Liechtenstein claims to be the world’s leading manufacturer of false teeth (Van Huygen, 2015). Unlike small jurisdictions in vast oceans, they are in no sense isolated, and experience myriads of interactions with their larger neighbours. Analysing those interactions seems to be a major research challenge, and provides points of contrast between geographical island jurisdictions and these small land-locked polities.

‘Islandness’: a cautionary note

The notion of ‘islandness’ emerges strongly in considering the governance condition of small (and to a degree isolated) jurisdictions, whether or not actually surrounded by water. Studies of “the social, economic and political dimensions of formality and informality in ‘island’ communities” (Skinner and Hills, 2006) attest to the unsuitability of applying

models developed in larger locales to the condition of smaller ones. So often, those involved in administrative reform and development in small jurisdictions bring with them Western notions of a division between political and bureaucratic elements of governance. But this model cannot work, and needs adjusting, in societies where ‘everybody knows everybody’, and family and kin cohesiveness provide the basis political dynamic. In these societies, traditions of shared ownership often apply, there is little social distance between ‘leaders’ and those they govern, almost every adult in employment is employed by government, and in best ‘pooh-bah’ fashion every official performs several roles, criss-crossing and confounding lines of responsibility (Murray, 1985, pp. 187-201; Corbett, 2013, pp. 1-21).

It is a bit trite to say that Aristotle understood this large-small difference very well.

Conclusion

The journey described in this essay has pulled together two areas of study that have captured my interest over a long academic career: public administration, now often going under the broader term ‘governance’, and the world of small and island states. As indicated, the journey began in one such state, Tasmania, and in a variety of ways it has taken me to, or otherwise introduced me to, many others.

There are of course tens of thousands of islands around the world. My concern has been with those that have settled populations, these populations to be found in various stages of development leading towards systems of organised government, with statehood as a fairly advanced stage of such development. Geological, meteorological, biological and other natural forces have shaped these islands and helped determine the basic character of their populations; economic and political forces have followed, with indigenous customs and beliefs, where they have existed, themselves evolving, and this process so often moderated by the influence of usually larger mentor states. Many have spent long periods functioning as dependencies or colonies of major empires, hosting the imperial traditions that have produced a degree of similarity across the governance systems of their subjects. Sameness has been elusive, however, and it is rare to find exact replicas existing anywhere through this world of small state and territorial systems of government.

They exist in many types of relationships with other states big and small. With some, they have historical links, with others they may share borders; but a degree of separateness is common. They come and go as larger entities in the international arena develop expansionist political objectives and battle among themselves to secure those objectives. They stay sometimes as satellites of those larger states, sometimes as irritants in the international political scene, quite frequently as the creations of small communities seeking genuinely to preserve their own traditions and mind their own business amid the complexities of the wider world. However, as a species they never disappear from the world map.

If we think in terms of jurisdictions rather than constitutional states, the observations of Aristotle made 24 or 25 centuries ago (noted in the Introduction to this essay) fit well enough with those developed more recently. All jurisdictions need to have arrangements in place to service certain functions, but size will determine how often those arrangements need to be operationalised or how professional the servicing needs to be. Of course, more distinguishing tests can now be applied: for example, non-sovereign and subnational island jurisdictions can exist alongside sovereign ones; ministerial systems can exist alongside non-ministerial ones, though it has to be said that democratic urgings in many places have more recently favoured the ministerial ones. My searches through the 1970s identified several

versions of ministerial arrangements marked by the structures of public service departmental systems headed by those ministers. They identified questions about patterns of relationships between executive governments and legislatures that surfaced in so many small jurisdictions, and questions also about types of connections with 'metropolitan powers' whose empires have so often, at some time or another, housed small jurisdictions – including questions about degrees of autonomy possessed by the latter.

The smallness factor is not the only one which influences the shape of these arrangements; but it is clearly an important one. Analysis shows that such issues arise in almost all small jurisdictions, and comparing arrangements from jurisdiction to jurisdiction provides a rich field for on-going research.

References

- Abjorensen, N. (1998, July 7). Independence smiles on tiny Estonia. *Canberra Times*.
- AGS (American Geographical Society) (1969). *Five Little Countries of Europe*, New York, NY: Nelson Doubleday.
- Aldrich, R., and Connell, J. (1992). *France's overseas frontier: departements et territoires d'outre-mer*, Cambridge: Cambridge University Press.
- Aldrich, R., and Connell, J. (1998). *The last colonies*. Cambridge: Cambridge University Press.
- Allan, C. (1982). *Constitution making in new island states*, Auckland, New Zealand: Legal Research Foundation.
- Aristotle in 1946 translation. *Book IV: Actual constitutions and their varieties*, in Ernest Barker, *The politics of Aristotle*. Oxford: Clarendon Press.
- Baker, R. A. (Ed.). (1992). *Public administration in small and island states*. West Hartford, CT: Kumarian Press.
- Baldacchino, G. (2006). Innovative development strategies from non-sovereign island jurisdictions. *World Development*, 34(5), 852-867.
- Baldacchino, G. 2010. *Island enclaves: off-shore strategies, creative governance, and sub-national island jurisdictions*, Montreal, QC: McGill-Queen's University Press.
- Baldacchino, G., and Milne, D (Eds.). (2009). *The case for non-sovereignty: lessons from sub-national island jurisdictions*, London: Routledge.
- Bartmann, B. (2009). In or out: sub-national island jurisdictions and the antechamber of para-diplomacy. In G. Baldacchino & D. Milne (Eds.), *The case for non-sovereignty: lessons from sub-national island jurisdictions*, (pp. 63-72). London: Routledge.
- Braibanti, R. (Ed.). (1983). *Asian bureaucratic systems emergent from the British imperial tradition*. Durham, NC: Duke University Press.

- Cader, M. (1975). *State industrial corporations in Sri Lanka*. Unpublished MA thesis, Canberra: Australian National University.
- Clesse, A., and Knudsen, O. (Eds.). (1996). *Small states and the security challenge in the new Europe*. London: Brassey's.
- Collins, P., and Warrington, E. (1997). *The new public administration: lessons from the experiences of small and island states*. Report on the Seychelles/ CAPAM/ IASIA Conference, April. Toronto, ON: Commonwealth Association of Public Administration and Management.
- Corbett, J. (2013). 'Everybody knows everybody': practising politics in the Pacific islands. *Democratization*, 22(1), 1-21.
- Frater, A. (2005). *Tales from the torrid zone: travels in the deep tropics*, London: Picador.
- Goetschel, L. (Ed.). (1998). *Small states inside and outside the European Union: interests and policies*, Dordrecht, The Netherlands: Kluwer.
- Grundy, P., and Wettenhall, R. (1977). Norfolk Island versus the Nimmo Report. *Current Affairs Bulletin (Sydney)*, 54(5), 17-25.
- Grundy, P., Oakes, B., Reeder, L., and Wettenhall, R. (1996). *Reluctant democrats: the transition to self-government in the Australian Capital Territory*. Canberra, Australia: Federal Capital Press.
- Jeffries, J. (1962). *Ceylon: the path to independence*. London: Pall Mall Press.
- Kermode, D. (1979). *Devolution at work: a case study of the Isle of Man*. Farnborough: Saxon House.
- Kersell, J. (1994). The potential of a 'Northern Windward Islands': an alternative in the north to the Netherlands Antilles. *Asian Journal of Public Administration*, 16(1), 41-59.
- Lee, K. (1993). *Diplomacy of a tiny state*, 2nd edn, Singapore: World Scientific.
- Loveridge, J. (1975). *The constitution and law of Guernsey*. St Peter Port, Guernsey: La Société Guernesaise.
- March, J., and Simon, H. (1958). *Organizations*, New York, NY: Wiley.
- Massey, A. (2004). Modernising government in the Channel Islands. *Public Administration*, 82(1), 422-443.
- Miroff, N. (2017, July 9). Uruguay going to pot ... literally. *Sunday Canberra Times*, p. 14.
- Murray, D. (1977). A problem in the administrative development of small island states. In S.K. Sharma (Ed.) *Dynamics of development: an international perspective*, (pp. 570-584). Delhi, India: Concept Publishing Co.

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- Murray, D. (1987). Public administration in the microstates of the Pacific. In E.C. Dommen & P.L. Hein (Eds.), *States, microstates and islands* (pp. 185-203). London: Croom Helm.
- Nimmo, J. (1976). *Report of the Royal Commission into matters relating to Norfolk Island*. Canberra: Australian Government Publishing Service.
- Oakes, W. K., and Reeder, L. J. (Eds.). (1991). *Governing the two Canberras: Canberra as federal capital and Canberra as a place to live*. Canberra, Australia: University of Canberra.
- O'Rourke, P. (1988). *Holidays in hell*. London: Picador.
- Oyun, S. (1999). Developing a national anti-corruption strategy: perspective of an economy in transition. Paper to World Conference on Governance, Manila, 31 May-4 June.
- Pirotta, G. A. (1996). *The Maltese public service 1800-1940: the administrative politics of a micro-state*, Msida, Malta: Mireva.
- Pirotta, G., Wettenhall, R., and Briguglio, L. (Eds.), (2001). Symposium on the governance of small jurisdictions. *Public Organization Review*, 1(2).
- Power, J., and Wettenhall, R. (1976). Regional government versus regional programmes. *Australian Journal of Public Administration*, 35(2), 114-129.
- Quah, J. (1999). Comparing anti-corruption measures in asian countries: lessons to be learnt. Paper presented at World Congress on Governance, Manila, 31 May-4 June.
- Raadschelders, J. (1992). Definitions of smallness: a comparative study. In R.A. Baker (Ed.) *Public administration in small and island states*, (pp. 26-33). West Hartford, CT: Kumarian Press.
- Rezvani, D. (2014). *Surpassing the sovereign state*, Oxford: Oxford University Press.
- Rowat, D. (1991). Canberra in international perspective. In W.K. Oakes & L.J. Reeder (Eds.), *Governing the two Canberras: Canberra as federal capital and Canberra as a place to live*, (pp. 28-45). Canberra, Australia: University of Canberra.
- Schaffer, B. (1957). The idea of the ministerial department: Bentham, Mill and Bagehot. *Australian Journal of Politics and History*, 3(1), 60-78.
- Schwartz, H. (1994). Small states in big trouble: state reorganization in Australia, Denmark, New Zealand and Sweden in the 1980s. *World Politics*, 46(4), 527-555.
- Skinner, J., and Hills, M. (2006). *Managing island life: social, economic and political dimensions of formality and informality in 'island' communities*. Dundee, Scotland: University of Abertay Press.
- Stanhope, J., Wettenhall, R., and Bhusal, T. (2015). Governance challenge: Australia's Indian Ocean island territories. *Asia-Pacific Journal of Public Administration*, 38(2), 87-102.

- Tange, L. (2017). A comparative study of the autonomy arrangement of the former Netherland Antilles in relation to the Åland example. *Journal of Autonomy and Security Studies*, 1(1), 76-113.
- Thynne, I. (1981). The ministerial system on Niue. *Public Administration and Development*, 1(1), 47-54.
- Thynne, I. (1996). Public administration in troubled waters: organisations, management and a New 'Oceania'. *Australian Journal of Public Administration*, 55(2), 47-53.
- Thynne, I. (1998). 'One country' or 'two systems'? Integration and autonomy in perspective. In I. Scott (Ed.), *Political transition and institutional change in Hong Kong*, (pp. 234-247). London: Macmillan.
- Thynne, I., and Wettenhall, R. (1996). Innovation in leadership structures in small and island states. Paper presented at 5th Pacific Islands Political Studies Association conference, Airai, Palau, December.
- Thynne, I., and Wettenhall, R. (2001). Understanding small-states governance: an emerging field. In A. Farazmand (Ed.) *Handbook of comparative and development public administration*, 2nd edn. (pp. 643-654). New York, NY: Marcel Dekker.
- Van Huygen, M. (2015). Thirteen fascinating little facts about Liechtenstein. *Mental Floss*, October.
- Veenendaal, W. (2015). The Dutch Caribbean municipalities in comparative perspective. *Island Studies Journal*, 10(1), 15-30.
- Vibert, R. (1990). *Parliament without parties: the committee system in the States of the island of Jersey*, St Helier: States of Jersey.
- Vibert, R., and Wettenhall, R. (1994). Using *all* the talents of a legislature in governing: a conversation. *Australian Journal of Public Administration*, 53(1), 107-115.
- Walker, M. (Chief Minister, Isle of Man) (1989). *Aspects of the constitution of the Isle of Man: the position of the governor and the development of a council of ministers*, Douglas: Executive Council of the Isle of Man.
- Warrington, E. (1994). A capacity for policy management: re-appraising the context in microstates. *Asian Journal of Public Administration*, 16(1), 109-133.
- Warrington, E. (Ed.). (1994). Symposium on the governance of small and island states. *Asian Journal of Public Administration*, 16(1).
- Watts, R (2009). Island jurisdictions in comparative constitutional perspective. In G. Baldacchino & D. Milne (Eds.), *The case for non-sovereignty: lessons from sub-national island jurisdictions*, (pp. 21-39). London: Routledge.
- Wettenhall, R. (1967). *Evolution of a departmental system: a Tasmanian commentary*, Hobart, Australia: University of Tasmania.

- Wettenhall, R. (1975). Bermuda boards: lessons for Canberra. *Public Administration (Sydney)*, 34(2), 171-182.
- Wettenhall, R. (1976). Modes of ministerialisation. *Public Administration*, 54(1), 1-20; 54(4), 425-451.
- Wettenhall, R. (1986). *Organising government; the uses of ministries and departments*. Sydney, Australia: Croom Helm.
- Wettenhall, R. (1993). Review of Aldrich & Connell 1992. In *Australian Journal of Public Administration*, 52(1), 132-133.
- Wettenhall, R. (1997). The microstates of Micronesia. Paper presented at IASIA Annual Conference, Quebec, July.
- Wettenhall, R. (1998a). Governing the ACT as a small quasi-state. *Canberra Bulletin of Public Administration*, 87, 8-20.
- Wettenhall, R. (1998b). The external relations of a small quasi-state within a federal system: the case of the Australian Capital Territory. *Public Administration and Development*, 18(2), 123-139.
- Wettenhall, R. (1999, May 13). City-state would benefit by looking to non-Australian models for development. *Canberra Times*.
- Wettenhall, R. (2016). Decolonising through integration: Australia's offshore island territories. *Island Studies Journal*, 11(2), 715-728.
- Wettenhall, R., and Grundy, P. (1992). *Norfolk Island and the electorate of Canberra: community of interest?* Consultants' report to the Norfolk Island Government.
- Wettenhall, R., and Thynne, I. (1994). Machinery of government innovation in microstates: the Cases of Nauru, Niue and Norfolk Island. *Asian Journal of Public Administration*, 16(1), 60-86.
- Wikipedia (2017a). *List of countries by population (United Nations)*, last edited 22 June 2017.
- Wikipedia (2017b). *Member states of the Commonwealth of Nations*, last edited 25 February 2017.
- Wikipedia (2017c). *Politics of Jersey*, last edited 25 June 2017.