Comparative Case Analysis of Constituent Unit Boundary Making Processes in Ethiopia, India, and South Africa

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Abstract

The foundation of federal systems of governments is the division of territory into political states, provinces, or regions (also known as constituent units). This article examines the processes and criteria used for redrawing constituent unit boundaries in Ethiopian, Indian, and South African federal systems. It uses a qualitative comparative approach, synthesizing secondary data from academic literature, legal documents, and policy analyses. Thematic coding guided the analysis of the data. The study found that the divergent criteria utilized to redraw the constituent unit boundaries in the three federations depend on the nature of each country's population for political mobilization around identity for self-rule. In Ethiopia and India, ethnic, linguistic, historical, and administrative factors mainly affected the boundary-redrawing process. In South Africa, balancing administrative efficiency and ethnicity has engineered the provincial boundary design. The criteria, number, name, and boundaries of constituent units have been changing over time, adding non-ethnic factors in both Ethiopia and India. South Africa prioritizes administrative efficiency over ethnic recognition, while Ethiopia prioritizes strong group recognition. The study suggests that federalism should be viewed with caution, as it does not create a "peaceable kingdom".

1. Introduction

Constituent units (CUs)[1] are subnational entities within a federal system that exercise constitutionally guaranteed powers. This level of administration is usually perceived as a structural reaction to the demands of federal governance (Alkali, 2017) as they shape the dynamics of political relationships and serve as the building blocks of a federation (Watts, 2008). CU boundaries particularly play a paramount role in shaping political representation, resource allocation, and intergroup relations in federations (Anderson, 2014; Assefa, 2012; Watts, 2008).

CUs' boundary design primarily depends on the history, political circumstances, and social nature of each federation (Adegehe, 2009; Watts, 2008). The purpose for which a federation is founded profoundly affects the number, name, and criteria used to define CU boundaries, as well as the procedures in place to allow for future adjustments (Saunders, 2018). In African countries, such as Nigeria, Ethiopia, South Africa, and Kenya, for example, federalism aimed to manage territorially based and politically mobilized cleavages (Assefa, 2022b). The boundaries of CUs also present basic questions of justice in federations characterized by

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[1] For detail terms referring to constituent units see from R. Watts (2008). This phrase is used in this article when referring to the second level of government, except when a specific case study is referred to, in which case the terminology used by that country will be followed, for example, regions/ regional states, states, and provinces.

having minority nationality groups. It is whether to empower or disempower these groups (Kymlicka, 2001) because it helps them preserve their distinct identities (Assefa, 2022b), as well as, it gives adequate expression to the demands of a particular society (Watts, 1998). So, boundaries of CUs are profoundly attached to issues of fair accommodation of minority nationalities.

In other words, diversity management issues are becoming more complex in today's global society (Kymlicka, 2007). Federalism also continues to be seen as a potential solution to conflicts in various parts of Africa (Yonatan, 2010) and beyond (Yimenu, 2023). Hence, analysis of the various approaches to organizing boundaries of CUs in multinational federations like Ethiopia, India, and South Africa certainly adds further insights to such parts of discussions. Although a study in this area is a growing body of literature, further analysis is still deemed necessary, and this paper is part of it.

This article has intended to comparatively analyze: 1) constitutional and legal frameworks; 2) historical and political contexts of boundary changes; 3) role of identity, ethnicity, and demographics; 4) conflict and consensus in boundary (re)making; 5) impact on governance and federalism; and 6) drawing lessons for comparative. In so doing, it has addressed four main questions: (1) what processes did each country follow to design its CUs, including its federal structure? (2) what criteria did the countries use to draw the boundaries of their CUs? (3) what implications and challenges did each of the countries face? 4) what lessons can be drawn for Comparative Federalism in general and for Ethiopia in particular? With this, this study aims to shed light on the complexities and implications of boundary-making in ethno-national federations and elaborate the context of recurring debates about diversity management in diverse societies.

To undertake this study, a qualitative comparative case study approach has been employed by doing an extensive review of existing federalism literature. The three purposively selected cases were examined within the confines of a common framework of analysis based on secondary data obtained from document analysis and literature reviews. Accordingly, a comprehensive review of constitutional documents, books, scholarly articles, and archive sources has been made. The cross-case comparison was conducted to thematically code and systematically compares the findings across the three cases, focusing on the similarities and differences in boundary-making processes, criteria used, and outcomes/implications.

The cases were purposely selected. Ethiopia and India may be viewed as 'ethno-federations' because territorially based ethnic-political mobilization has been at the root of demands for constitutional accommodation and has been important in determining CU boundaries (Anderson & Choudhry, 2015). The two countries have, however, taken different approaches that pave ways for comparison.

In other words, one may conclude that South Africa and India are relatively democratic states, while Ethiopia is neither a democratic state (Bach, 2019) nor a 'genuine' federation and may therefore difficult for comparison with the other two federations. Yet it is important to note that the former two countries are not identical cases, hence are reasonably close to enabling comparison, especially in their societal composition and historical developments.

Indeed, that is not the conclusion that the three cases are comparable. They are incomparable-historically, politically, economically, culturally, as well as with other several aspects. Specifically, Ethiopia is a historically unique country in Africa let alone with India and the well advancer South Africa. Equally, there is no all-inclusive single model of boundary-making and/or federalism applicable to all countries, contexts and situations. It is therefore, essential to have a structured, multi-dimensional comparison while allowing for in-depth country-specific insights.

This article has five sections. The first section is an introduction to the study. The second section sets theoretical reviews on CU design in federations and the role of federalism in diversity management. The third section examines the historical contexts and constituent unit boundary-making trends in Ethiopia, India and South Africa. The fourth section presents implementations and challenges of constituent unit boundary-making in Ethiopia, India, and South Africa. The last section provides a comparative conclusion in Ethiopia, India, and South Africa, with the intention of drawing lessons from the remaining two federations for Ethiopia.

2. Theoretical Reviews on Constituent Unit Boundary-Design in Federations

2.1. Approaches to determine internal boundaries in federations

The term "federalism" is employed in this study primarily as a normative phrase to describe the support for multi-tiered governance that incorporates aspects of both regional self-rule and shared-rule. It is predicated on the idea that unity and diversity are valuable and legitimate, in that different identities and may be accommodated, maintained, and promoted within a broader political union (Watts, 2008). Many countries adopt federalism to manage the diverse nature of their population and help promote unity, particularly if heterogeneity is clustered next to territorial borders (Steytler, 2022). To realize this, CUs serve as the building blocks of a federation (Watts, 2008).

Rajagopalan (1999) mentions that, the question of establishing CUs and determining their boundaries has two parts. The first part is deciding how many tiers the governmental structure should have and issues related to the distribution of power and lines of command, which are mostly decided by framers of constitutions. The second, and which is the focus of this study, is how states select criteria for demarcating the primary unit of their administration. That means whether the selected criterion should be language, geography, electoral considerations, or other criteria (Visser & Steytler, 2018).

Despite this fact, questions of criteria for drawing or changing internal boundaries in federations have not received significant attention for the most part of the last half of the 20th century (Norman, 2006), despite some historical descriptions of internal border changes of some federations like India, Switzerland, and the USA (Norman, 2006). Norman plainly states how the issue has been forgotten in both normative and positive theories of federalism: Given the vital link between territories, homelands, and nationalism, it is not surprising that the question of how best to fix the internal frontiers of federation should be

a hotly contested one between minority and majority nationalists. What is surprising is *how little attention these issues have received in both normative and positive theories of federalism* [emphasis added]. In practice, internal border changes in democratic federations are very rare indeed (p. 106).

The first genuinely mentioned comparative study of federal political systems was begun in Kenneth Wheare's classic study entitled *Federal Government,* published originally in 1946. This study was still accused of being 'highly legalistic in tone' and was dismissed for displaying 'very little understanding of political realities'(Riker, 1964). Since then, several prominent political science scholars, such as Michael Burgess and R. Watts, have developed new classificatory concepts that are much more capable of eliciting extensive information that is sufficiently precise to be compared. However, it is certainly difficult to capture all scholarly produced and other materials that have come through time contributing to comparative federalism in this tiny article. Therefore, only four approaches that are considered relevant to this study have been selected and discussed below.

The sociological approach to the study of federalism, which was first coined by Livingston (1956) and developed by Jan Erk in 2008, emphasizes the role of social cleavages and identities in shaping federal dynamics (Erk, 2008). Federal society now is related to whether there is mobilization around identity for self-government, meaning that the society is conceived as a politically mobilized ethnonational minority. This refers to a geographically concentrated ethnic group that once enjoyed or aspires to enjoy political autonomy within the state they were incorporated into during the coercive process of nation-building and constitutes an ethnic minority (Assefa, 2022a). The political mobilization of such groups revolves around claims of self-determination and national identity, whose goal is "to recover the extensive self-government that they claim to have enjoyed historically or that they aspire to have now" (Assefa, 2022b, p. 63). So, this approach is undoubtedly relevant to critically analyze the importance of ethnonational and linguistic factors in boundary-redrawing, as well as for designing inclusive constitutions and institutions for countries like Ethiopia (Assefa, 2022a, p. 283), India (Mawdsley, 2023, p. 3), and South Africa (Assefa, 2022b, p. 62). Therefore, in the redrawing of the CU boundaries in these three federations, it is expected that such social division is acknowledged and respected, which can better be discussed from a federal society perspective.

The political economy approach is the other selected one to examine how economic factors and resource distribution influence federal arrangements (Rodden, 2006). The same author plainly articulates that economic factors and resource distribution aptly influence the federal arrangements in countries that have a pronounced presence of interregional income inequality, especially if a large portion of the country's wealth is generated in one dominant jurisdiction, as well as where there are ethnic, religious, and linguistic cleavages.

It is emphasized that in nations dealing with separatist and autonomy movements, resolving economic inequalities among ethnic groups is essential to fostering stability and collaboration. It is especially advantageous to reduce economic disparities in nations like Ethiopia, India, and South Africa, where regional differences are substantial and political instability as well as interethnic conflicts is commonly observed. Doing so benefits all regions

– whether wealthy regions with a majority of nationalists, or wealthy regions with a majority of national minorities, or the "poor" regions in general (Sharma, 2024).

The third is consociational federalism. This perspective emphasizes power-sharing, minority veto rights, and segmental autonomy to accommodate diversity (Lijphart, 1999). Consociationalism is a democratic model that aims to settle political disputes among disputing parties through consensus-building methods. Moreover, consociational arrangements, in addition to charters/bills of rights or legislation that offer special provisions for group rights, can be used to accommodate minorities without their federal entities (McGarry, 2002). It is believed that consociational democracy is better in Africa because a democracy based on individual rights and majority rule would not provide the right tools to ensure that people from different groups correctly use societal (constitutional) goods (Solomon, 2012) and that all of the durably democratic multinational federations have practiced consociational rather than majoritarian forms of democracy (McGarry, 2002). The federal arrangement of Ethiopia aligns with this model as it aims to grant the marginalized ethnonational groups territorial self-rule (Assefa, 2024; Turton, 2006). Under Nehru's leadership, India is also said to have possessed strong consociational qualities during its most stable time. Furthermore, since the Congress's downfall, India has been run by a wide multi-party coalition that reflects its variety (McGarry, 2002).

The last approach used in this study is a historical-institutionalist approach that focuses on how historical legacies and path dependencies shape federal evolution (Broschek, 2011). The central idea in this approach is that any federal study should be conducted in conjunction with the historical past (Temesgen, 2016). Ethiopia, India, and South Africa have passed through a particular path of historical exigencies. This approach is particularly relevant for understanding the highly centralized nation-building process of Ethiopia, which is accused of being repressive against ethnonational groups (Assefa, 2022a), and the post-colonial and post-apartheid contexts of India and South Africa, respectively.

2.2. Federalism and diversity management

It is commonly accepted that federalism can provide a framework for accommodating minority rights and cultural diversity although some debatable issues still exist on its effectiveness in managing diversity (Kymlicka, 2007). This is mostly done through providing the advantage of creating democratic self-government for minority ethnic groups to increase their sense of security and positive identification with the multi-ethnic states and thereby reduce conflicts. In the same token, federal arrangements may also exacerbate ethnic tensions by institutionalizing group differences (Roeder, 2009a) if it fails to keep the balance.

It seems that is why the inception of federalism has never been smooth in both African and Asian countries from the outset. Scholars assert that federalism is linked to the divide and rule policies of the colonial experience in Africa(Wondwosen, 2008), in that post-colonial African leaders are afraid of its consequences (Wondwosen, 2008). Yet, African countries like Ethiopia (de facto in 1991 & de jure in 1995) and South Africa have incorporated some features of federalism into their constitutional frameworks in the post-Cold War era to address diversity and the tensions resulting from it (Anderson & Keil, 2017). In both

countries, Ethiopia and South Africa, federalism seeks to manage the societal cleavages, going beyond simply distributing authority. While it was adopted following a prolonged civil war in Ethiopia, the federal arrangement has attempted to resolve the country's deep cleavages in South Africa (Steytler, 2022).

Federalism was also instituted in Asia, the world's most diverse continent, as a way to hold states together after a significant portion of the continent was freed from colonial rule (Breen, 2018). Countries that have formally sustained federalism post-Second World War and post-colony in Asia are India, Malaysia, and Pakistan (Bhattacharyya, 2010), encompassing numerous ethno-regional and ethno-national identities. Despite this fact, studies indicate that the relatively successful federal arrangement in Asia is the state of India[2] because federalism helped the country to avoid disintegration (Bhattacharyya, 2010). Federalism has also benefited the country in terms of promoting democracy, strengthening national unity, and achieving a fair level of economic progress (Bhattacharyya, 2010). That is why India is selected purposefully from this continent to draw some lessons for Ethiopia.

3. Historical Context and Constituent Unit Boundary-Making Trends in Ethiopia, India and South Africa

3.1. Historical context and constituent unit boundary-making trends in Ethiopia

Ethiopia's historical circumstance is in some ways unique compared to the other two federations. Other than the Italian occupation from 1936 to 1941, the Ethiopia has never been colonized. The successive imperial regimes of the country had long been motivated to build an empire state by assimilating the distinct identities of different groups through oppressive means (Worku, 2016). Their policies, nonetheless, failed to achieve the goal of building an empire state. The Ethiopian state was extremely centralized and repressive, whose policies gave birth to the "question of nationalities" (Worku, 2016, p. 28). Despite divergent opinions over it, the ethno nationalist groups boldly assert that the country was on the verge of collapsing (Ghebrehiwet, 2015; Yimenu, 2023) when the Dergue[3] regime was overthrown in 1991. To protect the country's territorial integrity, it became compelling to assure self-administration and equality to the Nations, Nationalities, and Peoples (NNPs) of Ethiopia (Berhanu, 2006). Ethiopia adopted federalism de facto in 1991 and de jure since 1995 in a new structure following claims of the politically mobilized ethno-national groups. It was accepted that the federal setup uprooted the main threat to national unity and saved the country that was on the verge of disintegration (Tesfa, 2015).

In this way, Ethiopia uniquely recognized ethnonational identities in its federal structures (Yonatan, 2016). Its first 14 national/regional self-governments established in 1992 were designed along its ethnonational groups (Bekele, 2024b) following the recommendations obtained from the Transitional Period (TP) Boundary Commission (Vaughan, 2003) and intense negotiations among different actors of the making processes (Bekele, 2024b). The

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[2]The threats of separatist movements ever- present in the three countries, and Malaysia lost Singapore; and Pakistan lost its eastern part, East Pakistan, which became Bangladesh in 1971. But, India so far has not experienced any territorial disintegration. For further details, see Yonatan Tesfaye Fissha (2010).
[3]Dergue meaning "Committee" in Amharic that was in power from 1974 to 1991 in Ethiopia.

newly formed self-governments were organized to coincide with areas of the residing nationality groups (Bekele, 2024b; Vaughan, 2003). The long-aged questions of nationality groups, usually expressed as the 'questions of nationalities' coined by the Ethiopian Student Movement (ESM) in the 1970s (Assefa, 2022a; Leenco, 1998), guided the philosophies behind the arrangements of those newly formed national self-governments. The system had intended to address long-standing ethnic grievances and to promote self-determination for diverse groups (Bekele, 2024b; Micheau, 1996). When the five regions, Region 7 to Region 11 (Guraghe, Sidama, Wolaita, South Omo, and Kefa areas, respectively), were forcefully amalgamated to form one region, the Southern Nations, Nationalities, and Peoples' Region (SNNPR) at the end of the TP in 1994, however, Ethiopia became formally a federation of nine regions and two chartered cities in 1995.

Based on the Constitution (1995) of the Federal Democratic Republic of Ethiopia (FDRE), Article 39(3), "Every Nation, Nationality, and People in Ethiopia has the right to a full measure of self-government, which includes the right to establish institutions of government in the territory that it inhabits…", indicating that each NNP of Ethiopia has the right to establish a separate CU. This right is made clear under Article 47(2) of the same Constitution, which grants each NNP the right to establish, *at any time, their own states* [emphasis added]". So, when the demand for establishing its own state arises, each NNP of Ethiopia can, at least in principle, establish its own state. Not only this, the procedure for creating a new state is left exclusively to the NNPs, demanding establishing their own respective states, and this is to be done, at least constitutionally, without involvement of the federal government or regional states (Tessema & Simachew, 2020).

 There is no precondition, either numerical or economic, set to exercise this right to form one's own state, fulfilling only procedures listed under Article 47(3(a-e)) are required. Since 2018 only the Sidama National Region State (SNRS) was created in June 2020 for the Sidama people following the established ethnonational arrangement. The State of the Southern Nations, Nationalities and Peoples (SNNPR) was lastly re-dissolved in 2023 to form the newly created regions (South West Ethiopian Peoples' Region in 2021, the South Ethiopia region, and the Central Ethiopia region in 2023). These newly formed regions are not organized for a single ethnonational group. The settlement patterns, psychological makeups, and consent of the peoples concerned (Article 46(2)) seemingly determined the delimitation process. Political extra-constitutional negotiations additionally contributed to the formation of the Central Ethiopian region (Bekele, 2024b). Ethiopia has currently twelve regional states, seven of which are named after the predominant ethno-national groups.

Granting such an extended right to each NNP, however, embodied some problematic issues with itself from the outset. How can, for example, each NNP of Ethiopia establishes one's own state? Is it feasible economically for all nationality groups without a minimum requirement? Why has the Constitution left to set at least numerical threshold for establishing self-government at regional level? Is it because setting a threshold is not needed or a total neglect? These and other similar questions need deep analysis, but it is slightly covered in this article. Needlessly, the entitlement of this right has put the country into unfolding and recurring challenges overtime; multiple nationalities or competing ethnonational claims for self-government override the implementation of the federal system over the past federal

experience (Dessalegn & Afesha, 2020). Even ethnonational groups that have already been recognized continued to have unfolded claims for a different aspect of self-determination rights, such as the right to territorial autonomy, equitable participation, and the redrawing of internal boundaries coinciding with the place where they reside (Dessalegn & Afesha, 2020).

Post-1991, central to selecting criteria for CU boundary-making in the Ethiopian federation is primarily the commitment to grant the "…unconditional right to self-determination, including the right to secession" (FDRE, 1995, Article 39, No.1) for the NNPs of Ethiopia, the protection and promotion of their cultural and linguistic rights, as well as to address the long-historical marginalization claims of these groups (Bekele, 2024b). Scholars assert that the primary criterion for boundary demarcation is ethnicity, with a focus on language and cultural identity (Van der Beken, 2012).

The Ethiopian federal making began with the creation of 14 national/regional self-governments in 1992 during the transitional period. Article 46(2) of the 1995 FDRE Constitution states that regional states are "*delimited based on the settlement patterns, language, identity, and consent of the peoples concerned* [emphasis added]." Close follow up of the names and composition of the current twelve regional states gives us the mix use of these criteria; only seven of them are named following the names of the predominant ethno-national group residing in the region, while the remaining five have names either based on direction or different nationality groups,[4] constituting multiple identities within themselves. Even within the regions named after the names of the majority nationality groups, such as the Amhara National Regional State (ANRS), there are other nationality groups having established their nationality administration over the territory they reside in. This shows that creating entirely ethnically homogeneous regional states is difficult in Ethiopia.

A thorough analysis of the principles used for redrawing the CU boundaries in Ethiopia is found in different scholarly articles. Bekele indicated that the use of the socio-demographic data and (administrative) boundaries of *Woredas* were among the guiding criteria used for delimitating the interregional boundaries in Ethiopia in 1992 (Bekele, 2024a), which implies that the boundaries have ethnoterritorial and geographical elements. Historical factors also determined the formation of some regional states, like the Harari region (Vaughan, 2003). The Ethiopian approach to federal design generally aligns with McGarry and O'Leary's term, "pluralist federalism" (McGarry & O'Leary, 2009, p. 9), which explicitly recognizes and institutionalizes the diversity of its population, the NNPs.

The CU boundary design of Ethiopia, on the other hand, is criticized for worsening intergroup tensions, particularly in multinational areas or where there are competing claims to territory (Aalen, 2011; Abbink, 2011; Yonatan, 2010). The boundary disputes exacerbated conflicts between different regions, such as between the Oromia and the Somali Regional States (SNRS), between the Oromia region and the former Sidama zone, and between the ANRS and the Tigray region— are among the few illustrating cases.

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[4] South West Ethiopian region, Southern Ethiopian region, and the Central Ethiopia region, or having names such as Gambella and Gumuz-Benishangul regions that does not represent only one nationality group.

In this process of (un)making CUs, there are different actors involved, including the ruling party, the Tigrai People's Liberation Front (TPLF)/Ethiopian Peoples' Republic Democratic Front (EPRDF) (written as TPLF/EPRDF), and the representatives of some liberation movements that participated in the formation of the Transitional Government (TG) (Bekele, 2024b; Gutema Balcha, 2008). Aalen mentions that "the EPRDF's influence extends to all levels of the federation, blurring the distinction between party and state" (Aalen, 2011, p. 44). This dominance has allowed the party to implement its aspiration of instituting ethnonational federalism by recognizing diversity in Ethiopia until it was dissolved when the Prime Minister and the chairperson of the EPRDF, Abiy Ahmed, merged three of the constituent parties, excluding the TPLF, and formed the Prosperity Party (PP) in November 2019. Though not as strong as the TPLF/EPRDF, regional political elites (like the Harari region) and *Woreda* Councils, as well as local communities, have also been influential in providing some inputs in boundary negotiations, especially in their respective constituencies (Bekele, 2024b), particularly in regions with strong mobilization like Oromia and Tigray (Vaughan, 2003).

Notably, however, opposition parties and civil society organizations' participation is rarely witnessed; it is argued that the ruling party, TPLF/EPRDF's strategy, has restrained the political participation of independent actors (Aalen, 2011). Active organizations of the time like the Ethiopian People's Revolutionary Party (EPRP), the All-Ethiopian Socialist Movement (MEISON), and the Coalition of Ethiopian Democratic Forces (COEDF) were excluded from the democratic bargaining during the making process (Muluye, 2020), leading some to assert, 'Ethiopian federalism best fits Stepan's *putting-together* variant' (Muluye, 2020, p. 35). Because of this, the process of federating Ethiopia is criticized for being less participatory from the outset.

3.2.   Historical context and constituent unit boundary-making trends in India

The establishment of India as a federal system came following its independence in 1947. To create an integrated Indian state, they adopted "a federation with a strong center (Watts, 2008). It initially had 14 states, and currently there are 28 states and 8 Union territories (Tillin, 2019). This territorial reconfiguration of India happened over several years in numerous phases: during the 1950s and 1960s; the early 1970s; the late 1980s; the 2000s; and, finally, in 2014.[5] Although the process of creating sub-national units was complex and painstaking in India, the country managed to create 'states', mostly on the basis of language (Bhattacharyya, 2019), although non-linguistic ethnic criteria were also taken into consideration later on. In this way, the federal structure enables the states to preserve their own identities and administer their local matters in accordance with their cultural, social, and linguistic differences.

In India, the first phase of the provincial boundary-making started with post-independence administrative divisions (1947–1956), followed by the reorganization of linguistic states (1956–1966). Tillin refers to the changing Indian federal structure as "asymmetrical federalism," in which the degree of autonomy may vary among the various constituent units

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[5]Telangana is the 29th state of India created on 2 June 2014, founded by the Andhra Pradesh Reorganisation Act, 2014, from the state of Andhra Pradesh.

(Tillin, 2019). As the same source indicates, it is clear in the unique status given to some states, such as Jammu and Kashmir and states in Northeast India. The States Reorganization Act of 1956 was a watershed moment for redrawing state boundaries primarily along linguistic lines (Brass, 1974). This reorganization was a response to strong regional linguistic movements, particularly in southern India (Mitchell, 2009). Several factors, including concerns about economic development, administrative effectiveness, and ethnic identity, have influenced the creation of later states. The creation of Jharkhand, Chhattisgarh, and Uttarakhand in 2000 and Telangana in 2014 sets up the ongoing nature of India's federal restructuring (Tillin, 2019).

The criteria used for boundary-making in India have evolved over time. "The first set of units in independent India followed largely *administrative* lines" (Rajagopalan, 1999, p. 191,196). Administrative convenience and continuity with colonial-era divisions guided the first post-independence period of state organization (Tillin, 2013), though the creation of sub-national units in the county is mostly on the basis of language (mostly in the 1950s), ethnic, & religious lines (Legesse, 2017). The States Reorganization Commission recommended using linguistic homogeneity as the primary criterion for state reorganizations (Brass, 1974). Subsequently, however, a mix of distinct factors such as linguistic and cultural identity, economic viability, administrative efficiency, and political demands for autonomy were considered in the creation of new states in India (Tillin, 2013). For instance, the creation of Jharkhand in 2000 was driven by a combination of tribal identity claims and demands for better economic development in the region (Tillin, 2013).

The overall effect of the rationalization of India's subunits' (re)organization along linguistic lines has been carefully recorded as follows (Chwartzberg, 2009, p. 139): Firstly, in a major reorganization of the northeastern states of India, not only language but also ethnicity and culture were significantly applied. Secondly, not all languages have been stated. Thirdly, several of the states created after the 1960s (Tripura and Arunachal Pradesh) do not have an 'indigenous' language as an official language; thus, not all states are defined by language. Finally, the reorganization of states has mostly avoided the 'one language, one state' theory so feared by the States Reorganization Commission (SRC). Thus, in some scholars' observations, India cannot be considered an ethnic federation (Anderson, 2012). Rather, like Canada and Russia, India could be seen as a hybrid state that shares some important features of both ethnic and territorial federalism. Or, one may conclude that the evolving criteria for states' (re)organization in India reflect what Stepan et al. call "robust federalism" (Kumarasingham, 2011) characterized by its ability to accommodate diverse demands through institutional adaptation over time.

This flexibility in the country has thus played a paramount role in managing regional aspirations and preventing large-scale ethnic conflicts (Tillin, 2019). Bhattacharyya strongly attests that what held together India, the world's most socially and culturally diverse country, was its effective institutional design of the 1950s and 1960s, and "subsequently too, it was able to manage to recast and create subnational units with the purpose of making linguistically homogenous units as far as possible" (Bhattacharyya, 2019, p. 15) that came through various and complex interplays of actors.

The Indian constitution shows that the Parliament has the power to create new states. Given the constitutional power of the Union, it can rearrange the states, create new states from one or more existing states, merge two or more states into one, and order states to implement laws however it sees fit (Legesse, 2017). It is the parliament that makes and unmakes provincial boundaries in India.[6] The state reorganization commission, as well as state governments, may also play a crucial role in negotiating boundaries and advocating for or against state division (Mawdsley, 2002), while regional political parties are often at the forefront of demands for new states by mobilizing popular support and pressuring the central government (Tillin, 2019). In addition, civil society organizations and the judiciary (Annexe, 2001) have also an important say in boundary-making in India (Mawdsley, 2002). Therefore, compared to Ethiopia, boundary-making in India is a multi-actor and inclusive process reflecting the country's more decentralized and pluralistic federal structure.

3.3. Historical context and constituent unit boundary-making trends in South Africa

South Africa is an African country divided along racial, linguistic, and class lines. The county is characterized by successive colonial and white minority governments that promoted policies of racial separation between the minority white and majority black populations (Powell, 2010). Because of the National Party (NP) formal endorsement of apartheid, or the severe racial segregation of blacks and whites, the people were divided into racial and ethnic groupings and made to live apart in distinct group neighborhoods (Powell, 2010; Steytler, 2019). Separate 'homelands' were established for each black ethnic group with the view that these would one day become independent states, and black people were forcibly relocated to those areas (Steytler, 2022). The homelands were never meant to be economically self-sufficient but rather to serve the purpose of supplying the black labor that South Africa's economy required to maintain white dominance (Powell, 2010), leading to a growing resistance against apartheid under the leadership of the African Nationalist Congress (ANC).

As the country faced fierce resistance from the black opposition, the political leaders of South Africa negotiated a political agreement from 1990 to 1996 that ended decades of white minority rule (apartheid), prevented a full-scale civil war, and created a democratic state for the first time in the nation's history (Powell, 2010). After the end of apartheid with the adoption of an interim constitution in 1993, South Africa welcomed federalism and laid the groundwork for a convoluted negotiating process that resulted in a new constitution in 1996 that delegated more authority over territory (Yimenu, 2023). By 1993, the negotiators had agreed that the new Constitution would divide the country into provinces, but the thorniest issues remained: the number of provinces and their borders. Some groups wanted provincial borders drawn according to ethnicity to strengthen their political bases (Jackson, 2014). Being part of the political negotiation that characterized the transitional period, the provincial order of government was established before the final constitution was drafted, as were the territorial boundaries of the provincial and municipal governments (Powell, 2010). Finally, the demarcation of the nine provinces and their territorial boundaries were established under the 1993 interim constitution and left unchanged in the final constitution

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[6]Article 3 and 4 of the Indian Constitution.

of 1996 (Powell, 2010). The same constitution established the number, names, and boundaries of the provinces, which were maintained in the final 1996 Constitution and remain unchanged until today.

Muthien and Khosa (1995, p. 31) note that the boundary-making process in South Africa was influenced mainly by four factors: (1) the need to dismantle apartheid-era bantustans; (2) balancing ethnic and linguistic considerations; (3) ensuring the economic viability of new provinces; and (4) keeping administrative continuity where possible. The country's division into nine provinces is a structure that aims to balance various competing interests and considerations (Steytler & Mettler, 2001).

In the end, South Africa did not adopt an ethnic-based form of the federal state structure. "The ultimate selection of an openly non-ethnic (though not anti-ethnic) design for South Africa's federal system was made easier by the egregious use of ethnic federalism by the white minority to preserve the apartheid system" (Anderson, 2012, p. 252). That is why some have described the federal system of South Africa as a hybrid between federal and unitary systems, reflecting a broader trend in African federalism towards "federal-like" systems combining elements of centralization and decentralization (Dickovick, 2014, p. 24). This hybrid character is shown by the meticulous balancing act carried out during the boundary-making process (see Section 4.3 below).

The Commission on the Demarcation/Delimitation of States, Provinces, and Regions played a crucial role in this process of making, considering various proposals and stakeholder inputs (Steytler & Mettler, 2001). The resulting provincial structure is a compromise between different aspirations of the country's territorial organization, including proposals for a more ethnically based federalism (Henrard, 2002). In the South African federalism, provincial boundary-making involved a complex balancing act of multiple criteria, including historical factors that involved considering pre-existing administrative boundaries, geographic and economic factors that aimed at ensuring the viability of new provinces, demographic factors, such as population distribution and urbanization patterns reflecting where people live and work, and ethnic & linguistic considerations meant for acknowledging cultural identities while avoiding strict ethnic federalism (Muthien & Khosa, 1995). It is designed for a more inclusive governance system.

It started with the appointment of the fifteen-member Commission for the Demarcation and Delimitation of Provinces (Villiers, 2012) in May 1993. A nonpartisan commission for the delimitation and demarcation of provinces as well as a technical committee of demarcation experts were created by the multiparty negotiation forum to assist it (Powell, 2010). The Commission was appointed by the Negotiating Forum, comprised of all the major political parties involved in the negotiation process. It was mandated "to make recommendations on the demarcations of states, provinces/regions" (Powell, 2010, pp. 15–16) to the negotiating forum in terms of 10 criteria (Powell, 2010; Villiers, 2012).

When presenting these criteria, however, the Commission grouped them into four major groups: 'economic aspects; geographic coherence; institutional & administrative capacity; and socio-cultural issues' (Powell, 2010, p. 56). In the process, its outcome produced most

provinces having a dominant linguistic group, although they did not draw boundaries of the provinces according to the existing ethnic groups. In other words, it means that each province is home to a major cultural linguistic group, although provincial boundaries do not coincide with the areas of ethnic groups.

Anderson states that the criteria used by the Commission on the Demarcation/Delimitation of States, Provinces, and Regions to delineate the final lines were "the reduction of territorial disparities in social and economic development… and the prevention of negative forms of competition between regions," especially concerning "ethnic and chauvinistic" forces (Anderson, 2012, p. 252). In this sense, the boundaries were designed intentionally to avoid employing ethnicity as the defining principle. Nonetheless, unlike the Indian federation (Hindi-speaking group, for example), ethnic groups were not deliberately cracked into smaller units, even where they constituted a potential rival power base to the ruling ANC, such as in KwaZulu-Natal, which is dominated by Zulus in South Africa (Anderson, 2012). The KwaZulu-Natal province involved integrating the former KwaZulu homeland with the Natal province, acknowledging the significant Zulu population while also incorporating other ethnic groups (Henrard, 2002).

The Western Cape Province was similarly delineated by incorporating diverse populations while recognizing the concentration of Afrikaans speakers in the region. As a result, provincial boundary-making in South Africa stands for what Watts terms "territorial pluralism" (Watts, 2008), which looks to accommodate diversity without explicitly institutionalizing ethnic differences involving a complex set of actors in the reconfiguration processes.

As a dominant party of post-1994, the ANC has been playing a crucial role in shaping the federal structure of South Africa. By preferring a strong central government, the ANC has significantly influenced the outcome of federal design (Watts, 2008). Being the outgoing apartheid regime on its part, the NP was however the advocate of stronger provincial powers during the negotiation period, partly a strategy to protect minority interests (Steytler & Mettler, 2001). In other words, the regional party, the Inkatha Freedom Party (IFP), was pushing for Zulu autonomy and the creation of the boundaries of KwaZulu-Natal province. Henrard notes this accommodation is crucial for ensuring their participation in the new dispensation (Henrard, 2002). The Municipal Demarcation Board, which was set up post-apartheid as an independent body to decide on the municipal boundaries, is also the other important actor. The mandate of the Board is to create 'wall-to-wall' municipalities, which has fundamentally reshaped local government structures (Cameron, 2003).

When the decision of the central government with the consultation of the second levels of administration was needed on the newly formed provincial borders, the society at large took part in it. This process was implemented in 1993 when the country agreed as part of the larger constitutional negotiations to set up a Fifteen Member Commission, standing for the various political forces in the country with a mandate to recommend the number and boundaries of new provinces, subject to certain criteria (Anderson, 2014). The Commission held several hearings and received submissions on the provincial boundary arrangements. As De Villiers notes although not all its recommendations were accepted, the Commission

played a crucial role in shaping the debate on South Africa's federal structure (Villiers, 2007). However, Cameron contends that genuine community influence is often constrained by political and technical issues in the country (Cameron, 2009). The involvement of these diverse actors generally reflects the intent of the country to balance competing interests in its federal design. However, as some scholars have noted, the dominant nature of the ANC has led to a more centralized system in practice like that of the EPRDF in Ethiopia, despite the formal federal structure of South Africa (Siddle & Koelble, 2012).

4. Implementations and Major Challenges of Constituent Unit Boundary-Making in Ethiopia, India, And South Africa

4.1. The Influence of identity-based political mobilization

In a nutshell, the criteria used to make boundaries of CUs in these three federations are inherently dependent on the level of political mobilization around identity for self-rule. The three federations are diverse (the primary cleavages in South Africa being racial), but there is less mobilization around identity in South Africa, contrasting with Ethiopia's countless national liberation fronts and India's mass movements. When accommodation of diversity is the central element in the redrawing of CU boundaries in both the Ethiopian and Indian federations, the devolved systems in South Africa are mainly to ensure development in a balanced way. Territorially based political mobilization around identity and self-determination is pushing factors for more autonomy in Ethiopia (Assefa, 2022b).

The explicit recognition of the "unconditional right to self-determination, including the right to secession" (FDRE, 1995, Article 39, No.1) for the NNPs, stands out for Ethiopia as the dominant factor in boundary-making (Van der Beken, 2012). However, this approach contrasts with the evolving criteria of the Indian federation, which shifted from administrative convenience to linguistic homogeneity and later to a multi-factorial approach (Tillin, 2013). Moreover, the cases of Ethiopia and India demonstrate that restructuring boundaries and establishing new CU after the implementation of the federal system is possible, though not simple. Through drawing and redrawing processes, the names, compositions, and boundaries have been changing in Ethiopia (particularly in its southern part) and India. Currently, there are 12 regional states & 2 chartered cities in Ethiopia and 28 states & 8 Union Territories in India.[7]

The South Africa model, however, proves a middle ground, balancing ethnic considerations with other factors to avoid the potential pitfalls of strict 'ethnic federalism' (Muthien & Khosa, 1995). Much bargaining was carried out over the geographical design of the provinces, and the final boundaries were delimited in a similar way with the boundaries developed in the 1980s for the purpose of industrialization and development (Murray & Simeon, 2007). Consequently, in demarcating provincial boundaries, ethnicity would be one among a number of other factors, with economic integration the dominant. But we need to

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[7] There were 29 states in India as of October 31, 2019. The Jammu and Kashmir Reorganization Act of 2019 caused Jammu and Kashmir to be divided into two union territories on October 31st. However, India currently consists of 8 Union Territories and 28 States.

note that despite the adoption of economic regional blocks, linguistic (ethnic) predominance was present in seven of the nine provinces (Steytler, 2022). However, there was no attempt to make provinces linguistically or culturally identical in the South African federal arrangements. "India and South Africa have avoided drawing boundaries strictly on the basis of language or ethnicity, even if these factors weighed heavily" (Anderson & Choudhry, 2015, p. 18).

In other words, unlike the ethnonational federalism of Ethiopia and linguistic states of India that have generally been praised for accommodating diversity, even though the demands for new states based on various factors have continued (Tillin, 2019), the Ethiopian approach has been criticized for its formal recognition of ethnonational identity, usually said, 'ethnicity', that may potentially establish ethnic divisions in the country (Abbink, 2011). In other words, even though the federal arrangement of India may cause tensions between ethnic groups, which may result in different conflicts among the tribes, castes, provinces, or territories, which is also the case for interethnic conflicts in Ethiopia, the Indian structural arrangement based on linguistic and religious identities is not a threat to the union given the constitutional powers of the Indian Union (Legesse, 2017). Those conditions that can ensure the integrity of the federation in India are lacking in the Ethiopian federation (Legesse, 2017). In other words, although the balanced approach of South Africa has not fully addressed historical inequalities, it is still appreciated for providing stability in the country (Henrard, 2002; Steytler, 2022).

What can be concluded at this gesture is therefore that the contrasting approaches of these three case studies reflect different points on what Kymlicka describes as the spectrum between "nationality-based federalism" (Ethiopia) and "territorial federalism" (South Africa), with India occupying a middle ground that has shifted over time (Kymlicka, 2007).

4.2. Historical influences on the designing process of the constituent unit boundaries

It is mostly argued that every federation is the result of its historical context (Assefa, 2022b; Bekele, 2024b). Empirical analysis of the next section shows that each case study's approach to CU boundary-making is profoundly influenced by the historical context of their respective country.

Aalen (2011) and Bekele (2024b) note that Ethiopia's approach to boundary-making could be conceived as a reaction to historical ethnonational marginalization under the centralized rule of the past regimes. Historical claim was at the center of debate among the representatives of liberation movements when the first 14 national/regional governments were instituted in Ethiopia in 1992. In other words, state organization in India reflects responses to colonial legacies and post-independence linguistic movements (Brass, 1974). Furthermore, dismantling apartheid structures and addressing historical injustices (Steytler & Mettler, 2001) significantly affected the structuring of South African provinces. The overall analysis shows that these historical factors shaped not only the criteria for boundary-making in the three case studies but also the political processes through which the CU boundaries were decided.

That said, historical factors align with what Broschek calls a 'historical-institutionalist approach to federalism,' which emphasizes how past actions and decisions shape federal evolution (Broschek, 2011). What is learned is that the opposing historical experiences of these federations have led to divergent federal designs, supporting Burgess' (2006) argument that there is no universal model of federalism.

5. Implications of Constituent Unit Boundary-Making in the Three Case Studies

5.1. Implications on group relations and conflict management

As seen from the overall discussions of this study, the different approaches to boundary-making used by the three cases have had varying impacts on ethnonational groups' relations and managing conflicts. The interregional boundary-making in Ethiopia, while providing autonomy for major ethnonational groups within their assumed region, has in some cases worsened intergroup tensions, particularly in multinational areas or where there are competing claims to territory (Abbink, 2011; Bekele, 2024b; Fekadu & Ketema, 2023). In an attempt to grant self-rule to the politically mobilized ethnonational groups (Assefa, 2022b) over their assumed 'homeland', critics argue that such ethnonational territorialization risks entrenching divisions (Abbink, 2011).

The prevalence of displacements and interethnic conflicts in Ethiopia is mostly attributed to the internal framework of federal design (Fekadu & Ketema, 2023), which aims at solidifying identity and geographic boundaries. Conceiving conflicts or displacements in Ethiopia as due to the federalism and/or the ethnonational territorialization of the country, however, is simply overlooking the deep-rooted policies of the past regimes. These policies have historically marginalized the majority groups and fueled tensions that persist today. A comprehensive understanding of Ethiopia's current conflicts requires analyzing the interplay between historical injustices and its current federal structure. Hence, the conflicts happen not due to the federal structure rather due to the loose implementation of constitutional rights.

Comparatively, however, linguistic states in India have reduced language-based tensions, although new demands for statehood based on ethnic or regional identities continue to appear (Tillin, 2019). The Indian political engineering revealed that linguistic states have not weakened the federal government's central authority nor has it paralyzed the federal system—they uphold the rule of law and they take an active role in planning and economic growth with the center (Bhattacharyya, 2019).

Furthermore, the strong comment on South African federalism is that the avoidance of strict ethnonational federalism has helped manage potential conflicts, though some tensions stay, particularly in provinces like KwaZulu-Natal (Henrard, 2002). Inkatha is still aiming for a highly autonomous KwaZulu-Natal (Schwella, 2016). We need to still note that the federal arrangement in South Africa has provided only a partial solution in managing or mediating diversity conflicts in the country because the country is still facing major conflicts because

federalism has provided no answer for the black/white conflict in South Arica (Steytler, 2022).

Examination of these mixed experiences in the case studies contributes to the broader debate on federalism and conflict management. While advocates argue that federalism can accommodate diversity and prevent conflict (Bermeo, 2002), critics contend that it may institutionalize and worsen ethnic divisions (Roeder, 2009b). What has been seen in this study is that the effectiveness of federalism in managing conflict depends greatly on the specific design and implementation of federal arrangements. India as a country benefited from the staging of the new state-creation process. Most cases were resolved amicably through regular political debate and mobilization, but in a few, particularly in the north-east, restructuring was prompted by violent ethnic mobilization that was then followed by peace deals. The current map of 28 states could not have been created in a single motion in the 1950s. There have been increased stirrings of regional demands in Bundelkhand, Vidharba, eastern and western Uttar Pradesh, the Vindhya region, and elsewhere (Anderson, 2014; Blij et al., 2014; Mawdsley, 2023). This reveals that India's ongoing state reorganizations have been successful in maintaining some degree of political order, unity, and peace despite their complicated variety. Yet, the unmet statehood demands, though, are not the main challenges in Indian politics today; they need to be carefully handled from becoming a pernicious to the unity of the country—a claim that may lead to another phase of territorial reorganization.

Consequently, it needs to be learned from India that state reorganization might not be able to address all needs. The ongoing neo-liberal changes in India since 1991, which have changed the country from a public sector-dominated to a market-driven economy, have made territorial aspirations for statehood less appealing than they once were. The states today have to compete for investment, foreign and indigenous, and promote trade and business in their realm (Bhattacharyya, 2019). Hence, it is safe to conclude that India's recurrent territorial reorganizations have been the most powerful factor responsible for India's enduring political order and stability.

Conclusively, the predominant view of federalism as a tool of governance that resolves and creates conflicts rather than as a cure-all for the problems of divided societies (Bekele, 2024b; Tsegaye, 2014) is evidenced in this study. Therefore, we need to lower our expectations of the federal experiment (keeping in mind that it does not create the "peaceable kingdom" that idealist philosophers long hoped for (Tsegaye, 2014)) and instead choose the modest path of learning to live with the conflicts.

5.2. Implications for administrative efficiency and governance

The boundary-making approaches that the three federations pursued also have implications for the governance and administrative efficiency of multinational federations. The federal experiment in Ethiopia depicts that coordinating between the federal government and regional states, particularly in areas of competence, has been a challenge (Aalen, 2011). There were numerous cases when the federal government bypasses or suppresses the regional governments' powers and functions through party lines and centralized policy development for this purpose. Concerns over the rights of minorities have also been an issue

in Ethiopia (Assefa, 2006). Informal discussions with the high officials of some regions in Ethiopia, for example, the Southwestern Region, Central Ethiopia Region, and Gambella regional state, show that these regions have serious administrative ability problems.

Relatively speaking, however, linguistic homogeneity has improved communication within states in India, but analysis of some studies shows that exceptionally large states like Uttar Pradesh still face governance challenges due to their size and population (Tillin, 2015). Newly created states like Jharkhand have struggled with administrative ability in their early years (Tillin, 2013). In other words, empirical studies focusing on South African federalism show that the country's balanced approach supported administrative efficiency, though disparities between provinces in terms of ability and resources are still a challenge (Steytler & Mettler, 2001).

The overall observation underlines that the governance challenges faced by these three federations support what Rodden notes: federal design has significant implications for policy outcomes and governance quality. Lessons from Ethiopia and India prove the ongoing tension between accommodating diversity and ensuring effective governance (Rodden, 2006).

5.3. Implications for economic development and resource distribution

Although further analysis is needed in this regard, literature reviews and empirical studies show that the federal structures created by these boundary-making processes have significant implications for economic development and resource distribution. For example, Van der Beken (2012) contends that there has been uneven development and resource distribution between regions, with some regional states feeling disadvantaged in Ethiopia (Van der Beken, 2012). Assefa (2006) on his part, notes that the system has also created challenges for economic integration across ethnonational boundaries. After the establishment of the Sidama region, demands for a new state were primarily backed by the plié for economic resources in the southern part of Ethiopia (Bekele, 2024b). Similarly in India, as seen in the cases of Jharkhand and Telangana, the demands for new states are backed by economic factors (Tillin, 2013). However, the creation of new states has not always led to the expected economic benefits, and disparities within and between states persist (Bunnell & Maringanti, 2010) in both Ethiopia and India.

Furthermore, Steytler and Mettler (2001) observed that efforts have been made to balance resources between provinces of South Africa, but persistent inequalities still reflect historical patterns of development between provinces. The economic dominance of Gauteng province, for instance, continues to be a source of imbalance in the federation (Henrard, 2002; Kalema, 2000; Konstant & Moshikaro, 2016).

In general, the economic implications of CU boundary-making in these countries align with fiscal federalism theories, which emphasize the importance of balancing local autonomy with national economic integration (Oates, 1999). The challenges faced by all three countries in ensuring fair development across their federal units highlight the complex relationship between federalism and economic outcomes. A detailed understanding of this issue,

however, requires further analysis and discussion, which this manuscript has left for future study.

5.4. Implications for political representation and power-sharing

Practical observations and close readings of empirical studies on the three cases show that the process of CU boundary-making in each federation has shaped political representation and power-sharing arrangements in their respective federal systems. In Ethiopia, the arrangement has significantly enhanced representation for major ethnonational groups at the federal level, for example, in the House of the Federation (HoF),[8] and this is even constitutionally enshrined, but because of this, some have raised concerns about the rights of minorities within some states and those without their states (Aalen, 2011). The dominance of regionally based nationality parties has also affected the nation's political dynamics (Abbink, 2011). Now, identity-based politics has become a typical nature of the country's political culture.

In India, the creation of linguistic states and later, new states based on regional identities has generally improved regional representation (Tillin, 2015). It also has led to the proliferation of regional parties and complicated coalition politics at the national level (Ziegfeld, 2012) like Ethiopia. However, the provincial system in South Africa has tried to balance regional and national interests in power-sharing arrangements (Steytler & Mettler, 2001). Yet, as the EPRDF has done in Ethiopia, the dominance of the ANC at both national and provincial levels has, in practice, limited the federal character of the system (Henrard, 2002).

What can be said from the above analysis is that the varied impacts of boundary-making on political representation in these three examined federations contribute to debates on consociational versus centripetal approaches to power-sharing in diverse societies (Lijphart, 2004). It is learned that the federal approach of Ethiopia aligns more closely with consociational principles of group autonomy, while South Africa's approach reflects elements of centripetalism in its effort to create cross-cutting cleavages.

6. Comparative Conclusion

The comparative analysis of boundary-making processes in Ethiopia, India, and South Africa reveals distinct approaches to managing diversity through federal structures. Each approach reflects the specific historical, political, and social contexts of the countries. While strong group recognition takes a principal place in Ethiopia, it, at the same time, has faced significant challenges in implementation and consensus building. Given the historically deep-rooted assimilationist mentality, nonetheless, the current identity based- group recognition is the preferred state formation. However, the evolving approach of India proves flexibility in responding to regional demands, although it meets ongoing pressures for further subdivisions. South Africa's balanced approach is praised for better stability in the post-apartheid era, although it still grapples with historical inequalities and a nurtured

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[8]Currently, the House has 153 members representing 75 NNP of Ethiopia, each represented by at least one representative plus one additional representative for each additional millions of their respective population.

dream for an Afrikaans province or homeland.

It is learned that these cases prove the complexity of boundary-making processes in diverse societies and the need for context-specific solutions. The tensions between recognizing group identities and fostering national unity are key challenging issues in multi-ethnic federations. Overall, the comparative analysis of the three case has given major insights for the federal design of diverse societies, including the need 1) flexibility in federal structures to accommodate changing demands and circumstances, 2) balancing group identity recognition with measures to promote national integration and protect minority rights, 3) considering economic factors and administrative efficiency in the success and stability of constituent units of the federation; and 4) inclusive processes in boundary-delimitation processes to strengthen the legitimacy and acceptance of federal arrangements.

In Ethiopia, strengthening the practice of consociational democracy could address the concerns of minorities in relation to their right to representation and segment autonomy in or outside their regional states. The approach could also play a paramount role in overcoming the challenges of interregional/interethnic conflict management and the lack of coordination between the federal and regional states. In addition, future research could explore the long-term impacts of these distinct approaches on trust building, national unity, economic development, and conflict management in multinational federations. Additionally, comparative studies with other federal systems could further enrich our understanding of the challenges and opportunities in federal boundary design. Despite this, lessons from Ethiopia, India, and South Africa remain relevant to understand both the potential of federalism to accommodate diversity and the ongoing challenges of keeping unity amidst differences.

At the same time, these cases show the necessity of nuanced, context-specific approaches to federal design, supporting Watts' (2008) argument that there is no single model of federalism applicable to all situations. The challenges faced by these countries in balancing unity and diversity, efficiency and representation, and flexibility and stability reflect the enduring dilemmas of federal governance. Generally, these cases may offer rich comparative insights in this regard, but further research may expand this effort to other parts of the world.

In other words, as the focus of this study is limited to comparing the process and criteria each country used to thereby identify the challenges and implications of boundary-redrawing in the three federations, it has not fully explored other aspects of federal design that may interact with boundary issues. Future research may therefore take a more comprehensive approach and supplement it. Making a structured, multi-dimensional comparison while allowing for in-depth, country-specific insights is still required for the holistic understanding. Finally, although the findings of this study may offer valuable insights for understanding federal design in multinational federations, the unique historical and contextual factors in each case limit the generalizability of our conclusions. So, when applying these insights to other federal systems, considering local contexts is still important.

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