The Right To Self-Determination And Secession: Analysing The Catalanian Case

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ABSTRACT
In recent times, the right to self-determination has been evoked on several occasions and in totally different contexts: it has been invoked by the indigenous peoples of the Sioux Rock Nation in the USA in their opposition to the controversial Dakota Access Pipeline project (Carasik, 2016), it has also been invoked by the First Nation indigenous people in Canada (Coon-Come, 1992), by the people of Hong Kong seeking more autonomy from Beijing (Wong & Ngo, 2016), in Kashmir (Sehgal, 2011) by the people of the Catalanian region in Spain (Mansell, 2017), by the Kurds in Iraq (Nye, 2017), amongst many others. One of the most problematic aspects of self-determination, is that it is deeply interwoven with issues of secession. This explains why for all but very few governments, demands for self-determination are often worrisome. This scepticism is due to the fear that secession is the hidden agenda behind every claim to self-determination; in other words, secession is the ultimate fulfilment of the right to self-determination (Radan, 1994) or the wolf in the sheep’s clothing. Thus, the issue of secession has remained gloomy and controversial - usually the object of several debates. While these debates have covered a range of issues on secession, most of them have focused on the legality of secession, entitlement to secession in international law especially vis-à-vis conflicting principles of state sovereignty and territorial integrity. These controversies have been exacerbated by the absence of any consistent state practice and the flaws of the international law of statehood (Jure, 2012). This article seeks to examine the correlation between the right to self-determination and secession while exploring the various interpretations given to the right to self-determination. We shall also discuss the lawfulness of secession with an examination of the recent Catalanian crises (BBC News, 2017).

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INTRODUCTION
The right to self-determination is a long existing cardinal principle in international law (Fish, 2016). It is the foundation on which most nations and states have been built and had existed for a long time, even before it came to be established and widely recognised.¹ This right

¹ Many international legal instruments establishing the right to self-determination have been ratified. Some of them include: Common article one of the ICCPR and the ICESCR of 1966, the Charter of the United Nations (1945) – Article 1, Clause 2, the Universal Declaration on Human Rights (1948) (UN General Assembly 1948a), the UNESCO Universal Declaration on Cultural Diversity (2001) – (UNESCO 2001, Article 4), the Equator Principles (Equator Principles Association 2003), the World Bank Operational Policy (OP) and Bank Procedure (BP) 4.10 (2005) – The OP/BP 4.10 replaces OD 4.20 for (World Bank 2005) etc.
that’s an oversimplification of the right to self-determination. While most scholars agree that the right allows for some form of autonomy, there is disagreement over the limits of this autonomy; particularly whether it allows for absolute autonomy or secession. The right to self-determination can be divided into internal and external self-determination (Hannum, 2017). While the former refers to autonomy, the latter refers to total independence and is what many governments seem to dread. In an attempt to curtail this right, many have argued that the right to self-determination is limited to colonial states (Fish, 2016). This was a view advanced by the proponents of the Salt Water Thesis who argued that external self-determination only applied to colonial territories demarcated by salty oceanic waters (Corntassel, 2008). The International Court of Justice (ICJ) rejected the argument that the interpretation that the right of self-determination applies only in cases of colonialism. It stated: ‘… during the second half of the twentieth century, the international law of self-determination developed in such a way as to create a right to independence for the peoples of non-self-governing territories and peoples subject to alien subjugation, domination and exploitation…a great many new States have come into existence as a result of the exercise of this right.’ (International Court of Justice (ISJ), 2010).

To address the ambiguity of the right to self-determination the interpretation was restricted to ‘people’ in international law. However, the definition of the term ‘people’ remained unclear for quite a while (French, 2010). Despite attempts to clarify the term’s meaning, the demarcation between what clearly constitutes ‘people’ and what doesn’t still appear somewhat hazy. There seems to be conflicting standards of identifying unequivocally which groups may legitimately constitute a ‘people’ and can consequently claim the right to self-determination (Unterberger, 2002). However, it should be noted that even if the status of a ‘people’ can be established by an entity, the mere fact of constituting a distinct ‘people’ doesn’t ipso facto provide an automatic entitlement to the right to secede in international law.

In the case of the Catalonians, the people of Catalonia easily constitute a people under international law. In discussing the lawfulness of the Catalanian claims to secession, Professor Mark Weller argues that Catalonia easily meets the classical objective criteria for statehood which is a prerequisite for any claims to statehood. He presents the view that:

‘Catalonia can easily meet the classical, objective criteria for statehood. It has a clearly defined territory of some 32,000-sq. km, featuring clearly defined boundaries. Its stable population numbers around 7.5 million, far in excess of many recently independent states in Europe and beyond. It is the most economically viable region when compared to other parts of Spain. Even under autonomy within Spain, Catalonia has exhibited most of the functions of effective government.’ (Weller, 2017).

He concludes that ‘Catalonia is, at least potentially, capable of statehood.’ (Weller, 2017). However, being potentially capable of statehood is one thing and being entitled to the right to secede is another.

DOES THE RIGHT TO SELF-DETERMINATION ENTAIL A RIGHT TO SECESSION?

The question of whether the right to self-determination entails a right to secession or whether there even exist any such right to begin with has remained a divisive one to which international law has provided no easy answer (Brilmayer, 1991). Surprisingly, international law has been embarrassingly silent on this crucial issue (Vidmar, 2017) despite its long reputation of governing matters of statehood and inter-state relations (Sterio, 2008). There seems to be a distinction between acts of secession which occur because of lawful referendum and those which occur as a result of a unilateral declaration of independence also known as unilateral secession. It is believed that the international law framework on unilateral secession is determined by the advisory opinion of the ICJ on Kosovo paragraph 81 and the Quebec case paragraph 155 (ISJ, 2010).
The right to external self-determination cannot single-handedly be claimed by a few dissatisfied individuals. We certainly can agree that there must be some manifestation of the will of the people and not just a few disgruntled persons. As Weller points out, ‘any change in the social contract of a political community as dramatic as an act of secession from the established legal order must be based on the will of the people.’ (Unterberger, 2002). Generally, this will of the people can be revealed in a referendum and manifested in a formal declaration of independence. The lawfulness of declarations of independence was addressed by the ICJ in its advisory opinion on Kosovo where it stated that ‘no general prohibition against unilateral declarations of independence may be inferred from the practice of the [UN] Security Council.’(ISJ, 2010) The court further emphasized that a unilateral declaration of independence does ‘not violate general international law’ (ISJ, 2010) if such a declaration is not ‘connected with the unlawful use of force or other egregious violations of norms of general international law, in particular those of a peremptory character (jus cogens)’ (Vidmar, 2017). A similar position was adopted when assessing international law’s stance on acts of secession. Milanovic for example, argues that international law generally prohibits secession when it is being effectuated through the violation of some fundamental norm of international law such as the prohibition on the use of force or through the violation of basic human rights citing the case of the Turkish Republic of Northern Cyprus (Milanovic, 2017). Similarly, Mark Weller argues that statehood must not be tainted by jus cogens violations (Miller, 2002). There seems to be consensus that negotiations should be involved at every stage of matters of secession. Most of the time, declarations of independence are made after negotiations have failed to hold or have been unproductive and not before. In some cases, however, a declaration could be suspended after it has already been pronounced for further negotiations as seen in the case of the Catalanon declaration of independence (Jones, 2017).

Referendums are therefore an essential aspect of the right to self-determination as they represent a manifestation of the right to self-determination even when they yield unfavourable outcomes for the majority. Referendums have generally played a crucial role in preparing and facilitating secession. For example, the December 1991 Ukrainian referendum inaugurated the ‘parade of sovereignties’ of the Socialist Soviet Republics.

The January 2011 referendum in Sudan saw the creation of a new state, South Sudan. The 2014 Scottish referendum would have granted Scotland full independence and sovereignty from the UK. In fact, as a matter of hard international law, there seems to exist a customary law requirement to hold a referendum in matters of secession. A referendum was asked as a pre-condition for the recognition of a new state by the European Community in Opinion No. 4 of the Badinter Commission on Bosnia- Herzegovina (The Arbitration Commission of the Conference on Yugoslavia (ACCY), 1992). As Peter remarks, ‘…resort to a referendum has followed a meanwhile familiar pattern, well established in the post-1989 era of great territorial realignments, marked by the dissolution of the Soviet Union and the Socialist Republic of Yugoslavia’ (Peters, 2017).

Nevertheless, referendums are not void of controversies. In some cases, referendums that may seem lawful, have been completely ignored or rejected as was the case with the recently held Kurdish referendum (Morris, 2017). Similarly, the Catalanon referendum was dismissed by the government and the constitutional council as unconstitutional (Nagesh, 2017). This raises the question as to what may constitute a legal referendum? It is not totally clear what kind of referendum would be considered legal or who even gets to decide. Though most would argue that the government should be the judge of the matter, it is clear that most governments who feel threatened by the results of a referendum may likely avoid, frustrate or attempt to frustrate such a referendum. Nevertheless, as some would argue, constitutional admissibility or inadmissibility of a referendum, as in the case of Spain, is irrelevant.3 In assessing the fairness of a referendum, there are a few questions one must ask. For example, what are the characteristics of a fair referendum? Is the fairness of a referendum determined based on the proportion of the voters’ turnout? For example, is there a threshold for what would be considered a reasonable turnout? Or a ‘low’ turn out? All of

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3 Mark Weller and Anne Peters argue that it is typical that territorial referendums conducted in the exercise of the right to self-determination are unconstitutional under the law of the parent state and their lawfulness shouldn’t be assessed against the legal system from which they seek to separate. This appears a quite plausible argument. After all, many internationally recognized states only established themselves after bloody acts of rebellion and wars of independence which for the most, if not all, were unconstitutional.
this must be considered. Even if the result is totally, in favour of total independence, can such a referendum be challenged? These questions need to be carefully addressed by international law.

In the October 2017, Catalonian independence referendum for example, 96 % voted for independence, but with only a 42 % turnout (BBC News, 2017), would such a proportion be considered adequate or inadequate? There is also debate over the people allowed to participate in the referendum. Should participation be restricted to the people of the region demanding for secession like the Catalonian region in the case of Spain; or should participation be allowed for people throughout the national territory from which secession is sought? (ACCY, 1992). The danger with the latter would be the tendency of the pro-secessionists to be outvoted as they often make up only a minor portion of the entire population. In fact, there have been cases where governments have used this as a strategy to mar the referendum. The USSR, for example brought forward this argument when seeking to oppose the secessions of the Baltic Republics before the Union dissolved (ACCY, 1992). Even at the level of the pro-secession regions, one may have to also consider the positions of those living within the pro-secessionist regions albeit not in favour of secession - especially when they make up a non-negligible percentage of the region’s population.

In assessing the fairness of a referendum, there may be enquiry on any evidence of duress whether from the pro-secessionists or the anti-secessionists. It appears that the onus is on the pro-secessionists to show that any impediment to the fairness of the referendum was not of their making. In the case of the Catalonian referendum, this would be easy to demonstrate; the well-publicized obstruction came from the central government; it was reported that ballot boxes were seized, voting stations were closed precluding a significant percentage of voters from participating and in some cases secessionists were beaten up by the national police force (Grierson, 2017). The referendum on the transfer of Crimea from Ukraine to the Russian Federation in 2014 which occurred under gun-point of Russian soldiers and was declared null and void by the UN General Assembly (United Nations, 2014). The role of referendums in matters of secession is yet to be clarified. Peters argues that a favorable response from a properly conducted independence referendum will undoubtedly be a necessary precondition for lawfully asserting the independence, however it would not be a sufficient condition under international law (French, 2015).

As earlier mentioned, the issue of secessions poses ambiguities at several levels. One of the greatest areas of controversy amongst scholars on this issue is over legality. There have been frequent debates over the legal order governing the act of secession. One major disagreement has been whether this act is governed by international law or by the internal laws of the country concerned. This distinction is essential because it equally influences the legality of secession depending on whose side you may fall. So, depending on your standpoint, secession may be legal or illegal. To most governments, any act constituting an attack to its territorial integrity and sovereignty would be illegal. International law on its part asserts that people have a right to self-determination even if it means secession. The controversy does not end there; even if one were to take the view that international law was the legal order governing secession, the contradictions would persist. There seems to be an inconsistency at the level of international law between the cardinal principles of self-determination and the preservation of territorial integrity of the state. Municipal law is no better. While most municipal laws have ratified international conventions and treaties (like the UN charter and the International Conventions on economic and political rights) most of the municipal laws seem to conflict with ratified international norms on certain matters as they are framed in such a way as to prevent secession. In the case of Spain, its democratic constitution of 1978, was approved by an overwhelming majority of Catalan voters and gave wide autonomy to the regions but emphasized on ‘the indissoluble unity of the Spanish nation.’ 5 This means that a constitutionally legal secession can only be possible after an amendment of the constitution and this can only be done by the Spanish parliament of which the Catalonian representatives make up a tiny fraction.


5 Article 2 of the Constitution of Spain refers to the ‘indissoluble unity of the Spanish Nation, the common and indivisible homeland of all Spaniards’
In tackling the question of which legal order governs an act of secession Vidmar points out that in this modern world where almost all states have established boundaries considered sacrosanct; new states can only emerge at the expense of the territorial integrity regardless of the specific nature of the form of secession (Weller, 2017). Outlining the realities of modern times which have become the catalyst of politics on international norms. Vidmar argues that it is through politics, not law, that matters of secession can be resolved because ‘Statehood is quite simply a politically-created legal status under international law’ (Weller, 2017) and ‘Catalonia is yet another proof that statehood is a complicated nexus of law and politics which cannot be explained by legal rules alone.’ (Weller, 2017). Vidmar contends that ‘International law merely delineates the field for a political game.’ (Weller, 2017). States are usually quick to invoke international law when it serves in their best interest - and when it doesn't, there is usually a ridiculous disproportion between the acts of states and the provisions of international law.

Territorial integrity is not quite so absolute as some may claim. Sometimes states will waive such a claim like the United Kingdom for instance which was willing to do that with Scotland when they organized a Scottish referendum in 2014. But where the parent state does not waive its claim to territorial integrity, any attempt at secession is unilateral (Weller, 2017). However, Milanovic argues that, ‘domestic illegality… has no bearing on international legality; and that virtually all unilateral secessions violated the municipal laws of the parent state.’ Similarly, Weller rejects the possibility of unconstitutional rhetoric by arguing that an act of secession consists precisely of the removal of a population and territory from an existing legal order and the consecration of a new, independent legal order, and therefore it is not appropriate to evaluate the lawfulness of unilateral secession from the legal order against which it is directed (Fish, 2016). By thus clarifying expressly that a declaration of independence does not take place within the legal order from which the entity seeks to remove itself, he dismisses the idea that secession is governed by municipal law as some have argued. Weller seeks to demonstrate this by referring to the Kosovo situation. He suggests with regard to Kosovo, the legal order was based on a Chapter VII decision of the UN Security Council; that:

‘the rationale of the Court would, a fortiori, apply to cases of ‘ordinary’ constitutional law not based in such a higher-level, supranational decision. Hence, much of the argument relating to the purported unconstitutionality of Catalonia’s conduct at the point of declaring independence appears to be misplaced.’ (Jones, 2017).

Weller’s argument seems to assume that the legal order against which the secession is directed will be stiffly opposed to the idea of secession. Although this is often the case, it is not always so. The Ethiopian constitution for example, provides for the right to secession’ proving that the legality of secession can come from the constitutional law of the entity seeking to secede. Weller also dismisses the disingenuous argument that the Catalanian secession would be marred by the lack of recognition from other states. He contends that:

‘It is broadly accepted that the existence of a state is a matter of fact, rendering recognition declaratory. This was noted in the Badinter Opinions and confirmed in subsequent pronouncements. Hence, the attempt by some to conflate the requirement that a state must have the capacity to enter international relations with the need to attract widespread recognition is not persuasive—it would mean introducing the constitutive theory of recognition through the backdoor, after having just rejected it.’ (Jones, 2017).

While much of the debate has focused on whether international law provides for the right to secede or prohibits secession, some authors have taken an entirely different approach to that question. In the popular blog of the European Journal of International law, Milanovic agrees with Vidmar’s opinion that the argument on secession resides within the context of comparative constitutionality (ISJ, 2010). Thus, supporting the popular argument that issues on secession are contextually specific. He argues that

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6 The UNESCO International Meeting of Experts for the Elucidation of the study of the Concepts of Right of peoples, in 1989, provided a detailed and standard description of ‘people’.

7 Article 39(1) of the constitution: ‘… [e]very Nation, Nationality, and People in Ethiopia has unconditional right to self-determination, including secession.’
what works constitutionally for country A may not necessarily work for country B. For instance, what works for Canada and the UK may not necessarily work for Spain. The Spanish Constitutional tribunal’s approach on the question is different from that of the Supreme Court of Canada.

Somewhat ironically, Milanovic holds that international law regulates secession almost entirely, but admits that it has very little to say on the secession of Catalonia (Weller, 2017). To buttress his argument on how international law regulates secession almost entirely, he conceptualises international law’s regulation of secession in a three-part model. He argues that depending on the circumstance, international law will react differently to the question of secession; that international law prohibits, is neutral towards secession or provides an entitlement to secession in function of the circumstances. In his first model, Milanovic joins many scholars in arguing that international law generally prohibits secession ‘when it is being effectuated through the violation of some fundamental norm of international law such as the prohibition on the use of force or through the violation of basic human rights’ (ISJ, 2010) as in the case of the Turkish Republic of Northern Cyprus. This was confirmed by the International Court of Justice in the Kosovo Opinion, which demanded that statehood must not be tainted by jus cogens violations (ISJ, 2010).

Many have questioned the legality of secession by arguing that acts of secession are a violation of the territorial integrity of states guaranteed by the Charter of the UN. This argument has been dismissed by Mark Weller who argues that the evaluation of the lawfulness of unilateral secession shouldn’t be according to the legal order against which it is directed. He states:

‘Obviously, an act of secession consists precisely of the removal of a population and territory from an existing legal order and the consecration of a new, independent legal order. Hence, it is not appropriate to evaluate the lawfulness of unilateral secession per the legal order against which it is directed.’ (Jones, 2017).

Similarly, Milanovic dismisses the argument of territorial integrity, parallel to the comments of Weller, with the slight difference that he instead highlights the ICI’s Advisory opinion on Kosovo; arguing that the principle of territorial integrity is excluded from the earlier mentioned fundamental norm of jus cogens which an act of secession must not violate ‘insofar as it does not govern the relationship between the parent state and an internal secessionist movement; that principle is only relevant if a third state assists a secessionist entity, as with Turkey and the TRNC.’ (ISJ, 2010).

In his second model, Milanovic argues that under certain instances, international law is neutral towards secession - neither prohibiting it nor creating a right to it. He describes this as a ‘zone of tolerance’ likening this situation to the classic position towards secession in international law where states seeking independence against the wishes of their parent state fought and won wars against their parent states - as was the case with the USA and many other countries. Finally, in his third model, Milanovic argues that in certain instances, such as within the ‘zone of entitlement’, international law creates a right to secession under external self-determination or remedial self-determination as was the case with Kosovo. Milanovic argues that the major difference between the 2nd and the 3rd part of his model is in the level of effectiveness of the entity seeking to secede. Under the neutrality paradigm, an entity would need a great deal of effectiveness to successfully attain statehood; for example, it would certainly need to build independent, viable, long-term institutions, free from the meddling by the parent state. As if it were to create a new state from scratch. But a secessionist entity would need less effectiveness if it was in the third part of the model, for example, if it had the right to secede; East Timor needed less effectiveness than say Abkhazia in order to become a state. Therefore, he argues that ‘Legality thus advances or compensates for effectiveness’ (ISJ, 2010).

Thus, Milanovic provides no yes-or-no answer as to whether international law provides for a right to secede. Instead, he emphasizes that the answer to the question depends largely on the circumstances. International law tolerates secession or provides for a right to secede. Therefore, Milanovic joins Weller in his argument that the legality of Catalonian claims to secession should not be assessed solely from an internal law perspective as some have argued. Milanovic earlier commented that matters of secession are contextually specific. Under certain instances,
secession holds its legality from internal law and sometimes from both internal law and international law. For example, if the 2014 Scottish referendum has resulted in Scottish independence, the legality of such secession would stem almost entirely from the internal law.

Having dismissed the argument that the legality of the Catalanian secession must only be measured against the constitutional provisions, it is left to verify whether Catalonia has any entitlement to secede under international law. Using Marko's 3-part model, would this be one of those zones of tolerance or is there an express right of secession by Catalonia? It seems no. The Catalanian case for independence is based on the intrinsic right to self-determination. Catalonia have invoked their 'distinct culture and language' and a 'disproportionate contribution to the national budget' as key factors in their demand for independence (Khalaf, 2017) both of which seem to have little bearing in matters of secession in international law. As professor Buchanan⁸ states:

‘a distinct culture and disproportionate contribution to the national budget — which underpin the Catalan argument — are not a basis for a claim of injustice. Otherwise, rich cities, tired of subsidising poorer ones, would secede too and the right to self-determination would become a path to state fragmentation.’ (Jones, 2017).

Buchanan suggests justifications for secession which could possibly apply to Catalonia: the first justification would be in a scenario where all the autonomy that the Catalanian region benefits from is revoked by the Central Government in Madrid (ISJ, 2010). Also, if the State refuses to negotiate with a region that has a strong moral case for autonomy, it legitimizes the demands of that region for secession (Jones, 2017). It seems logical to argue that if an entity meets the objective criteria for statehood and that such an entity is the object of persistent persecution, it would be entitled to a right to secede. However, this is naively oversimplified of the political reality. If this were to be upheld, there would be a chaotic surge in the number of seceding states as there exist several entities who are undergoing consistent persecution.

It has been argued that there exist, under some extreme circumstances, a remedial right to secession. This position is highly disputed particularly because of the absence of any consistent state practice on the issue. Even if this right existed, Catalonia cannot claim for a remedial right to secession. As Milanovic opines: ‘Even if an entitlement to remedial secession existed in modern international law (and it almost certainly does not…), Catalonia is factually very far indeed from situations in which such a right might apply.’ (ISJ, 2010) He points out that Kurdistan, despite being visibly more entitled to remedial self-determination, has not successfully evoked it. Marko concludes on the point that if the states appearing before the ICJ were a representative sample of the international community as a whole, then the question of the existence of the right to remedial secession would remain an inconclusive one (ISJ, 2010). That even if the right to secession was actually available, it could be exercised only as an ultima ratio which is why to him, Kurdistan’s claim flounders; that the government of Iraq today is no longer Saddam’s, and this new government has no particular desire to systematically oppress the Kurds or deny them internal self-determination instead they have received a great deal of autonomy and self-regulation. Therefore, whatever positive entitlement to secession that Catalonia may once have had has lapsed in the intervening years. Not to mention the bitter political reality about matters of secession. In the case of Kurdistan, the Iraqi government, like most governments (if not all governments), is stiffly opposed to any idea of secession, so is the position of its neighbours: the Turkish and the Iranian governments. Therefore, to Milanovic, Catalonia is thus, like Kurdistan, and Kosovo, in the middle, neutral zone of his tripartite model above in which international law has little to say.

CONCLUSION

In conclusion, the debate over the relationship between the right to self-determination and cessation is not yet closed. Whether there exists a right to secession appears to be a matter of opinion. As Anne Peters notes, the ICJ, in its Advisory Opinion on the matter, inverted the legal question placed before it. It shied away from saying anything meaningful on secession (as opposed to the speech act of declaring independence) leaving the question looming (Peters, 2017). The parsimonious position of the

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⁸ Professor Allen Buchanan of Duke University is an expert on self-determination and statehood with several books published.
court on the issue has not really advanced the debate. International law seems to conflict with municipal law and even with itself. The revered principles of self-determination and territorial integrity need to be reconciled. Municipal law seems to be intransigently framed in such a manner as to thwart secession by every means. Many who think international law should be the sole legal order regulating matters of secession because of its long reputation of regulating matters of statehood and inter-state relationships have been embarrassed by the silence of international law on these boiling issues. This appears to be the bitter reality of international law. As Jure puts it, ‘statehood is quite simply a politically-created legal status under international law’ (Brilmayer, 1991) – with the Catalonian crises seeming in agreement. In the light of this political reality, it is important to distinguish the right to secession from the act of secession itself for it is one thing to be entitled to secede and it is another to secede. While the Montevideo Criteria is quite essential in guiding our understanding of the right to secede, it must be emphasized that ticking all the boxes of the Montevideo Criteria doesn’t necessarily entitle an entity to statehood. After everything, statehood itself is nothing but ‘an abstract construct of law and politics.’ (Watts, 2017) Milinkovic’s 3-part model seems to be the most satisfactory response to the question of whether international law provides for the right to succeed. I argue here that international law and internal law both govern acts of secession for internal law; and has often provided solutions where international law has failed to do so. Article 39 of the Ethiopian constitution for example provides for the right to secession.\(^9\) Despite the popular argument that internal laws are against any form of secession.

BIBLIOGRAPHY


