THESIS

AUTONOMOUS REGION FORMATION IN THE MIDDLE EAST:

CASES IN KURDISTAN

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ABSTRACT

AUTONOMOUS REGION FORMATION IN THE MIDDLE EAST: CASES IN KURDISTAN

Autonomous Region Formation in the Middle East - Cases in Kurdistan, is a thesis paper that interacts with Yash Ghai's theory for the formation of autonomous regions (Ghai, 2003), and applies the analytical framework developed by Yash Ghai and Sophia Woodman (Ghai and Woodman, 2013) to a series of cases left out in the original study. The paper seeks to address the gaps and limitations of the original study by selecting cases from the Middle East geographic region, stemming from the shared experiences of the Kurdish people and their bids for autonomous region formation, and encompass both established and unestablished autonomous units. The cases of Iraqi Kurdistan (Iraq) and the Autonomous Administration of North and East Syria (AANES) (Syria) serve as established autonomous units while the Kurdish majority regions of Bakur (Turkey) and Rojhelat (Iran) serve as unestablished cases for which a comparative analysis can be made. By utilizing Ghai's theory (Ghai, 2003) and the analytical framework of the original study (Ghai and Woodman, 2013), this paper tests the theory and framework against a new set of cases with characteristics different than those in the original study, effectively challenging, testing, and advancing the theory and framework. The paper highlights the strengths and weaknesses of the theory and analytical framework, as well as proposes potential factors and avenues of analysis that could be included in the future.

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CHAPTER 1: INTRODUCTION

The formation of autonomous regions is a political phenomenon often neglected in contemporary political science scholarship and assumed to be sporadic, irregular, and unpredictable. Additionally, political science research tends to focus on the state as a unit of analysis, limiting the scholarship on parallel 'state-like' structures such as autonomous regions which simultaneously are not states, mirror the characteristics of modern states, and challenge contemporary concepts of statehood and sovereignty. In this light, the study of autonomous regions is inherently critical, contested, and can be underrepresented in the larger political science scholarship. The purpose of this paper first and foremost is to further this line of inquiry. The research questions posed in this paper, and the guide for the following investigation, are as follows. Under what conditions do autonomous regions form? What factors explain the variation between the establishing, or non-establishing, of an autonomous territory? What does the formation of autonomous regions tell us about the state, sovereignty, and independence?

This thesis paper will explore the formation of autonomous regions by exploring cases in the Middle Eastern region, specifically in the Kurdish context, which encompasses a substantial history of autonomous movements and cases of established and non-established autonomous territories. Each of the following cases falls within the historical territory colloquially known as "Greater Kurdistan" which spans the modern states of Syria, Iraq, Turkey, and Iran. The paper will proceed as follows. First, a literature review will take place which will explore the concept of autonomy, and territorial autonomy, and introduce some of the major scholarship on the phenomena. This includes an overview of Ghai's theory on the formation of autonomous regions

(Ghai, 2000) and Ghai and Woodman's later study (Ghai and Woodman, 2013) for which this paper will seek to interact with and ultimately advance. Next, Chapter 3 will outline the methodology, research objective, design, and accompanying analytical model that will be used in the interpretation of the case study findings. In Chapter 4, each case study will be executed and circumstances, events, or factors that have an impact across all of the case studies will be highlighted. In Chapter 5, the paper will interpret the findings in regard to Ghai's theory (Ghai, 2003) and within the framework outlined in the previous study (Ghai and Woodman, 2013). This chapter will also discuss the impact of the findings on the larger theory and its contribution to the literature. A brief concluding chapter will summarize the findings and potential avenues for future research.

CHAPTER 2: LITERATURE REVIEW

2.1. Theoretical Framework

Literature interacting with the formation of autonomous regions stems from scholars who see analyzing and interacting with populations and phenomena in the periphery of a state-centric international political system as extremely important. Given the nature of autonomous regions and the challenges they pose to the modern state system and concepts involving statehood and sovereignty, much of the scholarship and theories relevant to the study of autonomous regions stem from a critical approach and from Critical Theory itself. A critical approach recognizes the complex network of relationships that determine and restrict human behavior and actions in a society. These approaches seek to isolate and explore these networks and relations and uncover how they are legitimized, such as with the advancement of specific norms, values, laws, concepts, and even knowledge generation itself. It recognizes how these systems and networks of relationships systematically benefit some categories of actors and values over others. “The whole point of a critical theory is to redress a situation in which a group is experiencing deep but remedial suffering as a result of the way their lives are arranged” (Fay, 1987, 29). Thus critical theory is intrinsically underpinned by a tension between contemporary society and systems of inequality and power (Horkheimer, 1972, 218). Robert Cox (Cox, 1981) further emphasizes that critical theory calls into question the origins of dominant power systems and how they might be in the process of changing. It first takes its starting point on a specific aspect of society or political or social phenomena, but, instead of breaking down and separating the phenomena into its smaller parts, it seeks to construct a larger picture of the whole (Cox, 1981, 129). Critical

theory is a theory of both history and present, tying past processes of domination with contemporary manifestations of marginalization and inequality, and advocates optimistically for a future void of these arrangements (Cox, 1981, 130). Much of the theory, scholarship, and literature surrounding the political phenomena of autonomous regions stems from critical theory and adopts qualitative methods in their investigations that emphasize contextual elements including the political, social, economic, historical, legal, and cultural factors that influence or contribute to autonomous regions and their formation. In line with the values and epistemological commitments of critical theory, autonomous regions and bids for autonomy are critiques of the modern state, of dominant political systems and power dynamics, and seek to effectively separate and differentiate marginalized populations from the systems that oppress them. Autonomy and the formation of autonomous regions in a theoretical sense is a process that deviates from the common principles, processes, and institutions of the modern state which effectively enables a community to pursue a lifestyle and organizational structure based on its unique values and culture that is marginalized from the larger society (Ghai and Woodman, 2013, 5-6). Autonomy and autonomous regions at the most fundamental levels stem from a critique of modern society, social and political organization, the modern state system, the ways that these systems fundamentally disadvantage marginalized groups, and offer a pathway, or an idealization, of how to detach these groups from those systems.

2.2. Key Concepts and Theories Relevant to the Research

Autonomy is a concept that has no solidified definition or application. Some see the concept of autonomy as a confusing or ambiguous concept that stems from multiple fields of scholarship including medical ethics, international law, and political philosophy with no clear

unified characteristics or definitions (Wilberg, 1998, 43). At times autonomy, particularly in political science, is closely connected to contested concepts like authority, control, freedom, interdependence, interest, liberty, non-interference, paternalism, power, responsibility, social coordination, self-government, and sovereignty (Wilberg, 1998, 43 & Heintze, 1998, 7-8). Some scholars see autonomy as a strictly relative concept that is variable in its application, historically specific, highly contextual, contested, and is used to pursue a variety of objectives of a variety of ideologies (Pickerill and Chatterton, 2006, 732). Given the ambiguity inherent in the concept of autonomy, it is very important to define and deconstruct the concept in the terms and context for which it will be interacted with in this paper. Scholars and previous works suggest some definitions and characteristics of autonomy which will be adopted in this paper. Autonomy in its most basic form refers to the ability of a region or community to practice self-government by organizing its affairs separately and without interference, from a central government or its neighbors (Ghai and Woodman, 2013, 5-6). An autonomous region then is a self-governing intra-state region (Nordquist, 1998, 59-60). The degree to which this autonomous entity enjoys an independent decision-making process can vary but in almost every case it involves a granting (either by legal agreement, negotiation, or *de facto*) of internal self-government to the autonomous entity by the central government. Autonomy and autonomous arrangements are distinctly connected to the efforts of marginalized groups (such as minorities, suppressed people, indigenous people, etc.) their struggles and experiences of oppression, and their efforts to establish political and social organization systems that simultaneously represent their interests and values and protect them from the larger society and national systems that suppress them. As such, concepts of autonomy and autonomous regions are tied to identity, culture, tradition, and history (Heintze, 1998, 15). Likewise, autonomy and autonomous regions are connected to

concepts of ethnicity (ethnic groups) and nationalism (national identity), both encompassing aspects of differentiation between groups on social, political, and territorial grounds.

Ethnicity and ethnic groups play an important role in bids for autonomous region formation. An ethnic group can be defined as a population that is biologically self-perpetuating, shares fundamental cultural values and traditions that are expressed overtly, has a shared field of communication and interaction, and has a population who identifies itself as distinct from other categories of groups and peoples and those other peoples also recognize this distinction (Barth, 1969, 10-11). Ethnicity is given at birth through ascription - the assigning of a particular quality at birth (O'Neil, 2013, 65). Factors of differentiation include language, religion, customs, appearance, geographic location, history, and other contextual variables (O'Neil, 2013, 65). While differences between ethnic populations take these factors into account, it is imperative to recognize there are no objective differences for which these differentiations can take place. Rather, factors for differentiation are relative, emphasized, or played down, depending on the goals of the individual actor and what they deem as being significant for establishing differentiation from others (Barth, 1969, 14). Simply put, ethnic groups define and differentiate themselves from other peoples on the grounds that they truly believe, for a number of factors and justifications, that they are different from others in society. The boundaries for which ethnic groups are differentiated are substantially social boundaries and not necessarily based on their occupation of an exclusive territory, although there may be territorial counterparts and expressions of this differentiation.

Nationalism and national identity are intrinsically political and tied to a group's desire for self-government and the idea of an independent nation (O'Neil, 2013, 66). While ethnic groups can be constructed in a relativistic sense from group to group, encompassing social components

but not necessarily political, the same cannot be said for national identity. The primary factor that binds a group together in this concept is shared political aspirations and, most importantly, demands for greater freedom, self-government, and sovereignty. Ethnic identity, in many cases, leads to the development of national identity when an ethnic group feels that they are marginalized by the existing political systems in which they exist (O'Neil, 2013, 67). Nationalism, a product of national identity, is created by a people's belief that they are unique and deserve a self-deterministic political destiny (O'Neil, 2013, 67). National identity, given its political nature and self-governance principles, manifests often in territorial forms. As will become clear in this paper, the Kurdish context encompasses both an ethnic group and national identity, making it a particularly rich universe of cases for exploring autonomy and autonomous region formation.

Definitions of autonomy are connected to and come about out of these ethnic group and national identity contexts. Autonomy can manifest in various forms with different characteristics but can be summarized and categorized into two main categories: Territorial autonomy and non-territorial autonomy. Non-territorial autonomy is characterized by notions of autonomy stemming from cultural, personal, and functional dynamics. Non-territorial autonomy can exist outside of regional or geographic locations, although autonomy usually takes territorial forms, and unites people on the grounds of shared identity, tradition, culture, and values. This type of autonomy stems from the recognition that not all ethnic and identity groups are concentrated in a single geographic area and are ways of overcoming the limits of territory - "when the community in question is dispersed over a wide area or, if concentrated, is not the majority there" (Ghai and Woodman, 2013, 6). Cultural autonomy is the self-governing of cultural affairs by the autonomous entity and minority group on issues involving language, education, social behavior,

etc., separate from the central government. Ultimately, cultural autonomy aims to establish the free cultural development of the group (Heintze, 1998, 21). Cultural autonomy runs into problems and conflict when its efforts create separation or isolation of different cultural or ethnic groups in the larger society from one another, eroding the unity of the larger state system and potentially creating domestic conflict. Personal autonomy is based on the personality principle where the collective rights of a group are transferred to the individual rather than remaining at the level of the group. It avoids the problem of territorial autonomy where there is a rearranging of minority/majority dynamics. It also avoids disputes over the size of the autonomous region and the possibility of secession from the larger state. This type of autonomy involves the creation of a democratic body, such as a national council or proportional political representation, that is legitimized by the majority of the group's members and can engage in diplomatic functions with the larger state. Personal autonomy has its challenges, particularly with the establishment of new majority/minority dynamics and de facto acceptance of group membership regardless of the person's actual belonging to the group. Personal autonomy is also difficult to integrate with modern goals of uniform administration and standards of living (Heintze, 1998, 23). Functional autonomy requires that the minority group is organized into private organizations collectively and without any central state influence. Functional autonomy involves the transferring of state functions, public administration duties, and rights to these private organizations for overseeing culture, the media, education, and religion as they are essential for upholding the group's identity. Because of the lack of bureaucracy, functional autonomy is seen as the easiest way to improve minority participation in political and social rights, although a major disadvantage is that it is threatened by its lack of protections under public law (Heintze, 1998, 23-24). Non-territorial forms of autonomy are mentioned in this paper to highlight the intricacies of defining and

characterizing the concept but will only serve to this extent. The context in which this paper will adopt in its investigation is firmly in the territorial autonomy orientation.

Territorial autonomy is most present in discussions, studies, and investigations into the manifestations of autonomy and thus is considered the most important for this analysis. Territorial autonomy can only be realized if the group being represented and protected resides in a well-defined territory in which the group constitutes the majority of the population. Territorial autonomy includes the competence of self-governing institutions to oversee the territory and its affairs, this includes not just local and regional affairs but also issues important to the minority group. Those residing within the autonomous territory, regardless of their identity or minority/majority status, are subject to the autonomous status and the legal, political, and social arrangements of the territory. These arrangements do not exist outside of the autonomous territory (Heintze, 1998, 18). Given the complex network of relationships and commitments between groups advocating for autonomous arrangements, central "host" governments, and the larger international community, defining autonomy in its legal contexts can prove useful. It is important to note that in the scholarship the term "self-government" is frequently used synonymously with "autonomy" to the extent that in legal-political vocabulary autonomy denotes self-government (Heintze, 1998, 7). In Hans-Joachim Heintze's work, *On the Legal Understanding of Autonomy* (Heintze, 1998), they provide the domestic and international legal contexts for autonomy:

> "In domestic law, autonomy is part of the self-government of certain public corporations and institutions. It includes the power to make statutes, that is, the authority to regulate their own affairs by enacting legal rules… In international law, autonomy means that parts of the State's territory are authorized to govern themselves in certain matters by enacting laws and statutes, but without constituting a state of their own" (Heintze, 1998, 7).

Investigating autonomy in this territorial context, definition, and characteristics will be the primary framework in which this paper will interact with the term autonomy.

2.3. Historical Context, Evolution of the Political Phenomena

Autonomy and autonomous region formations have been a point of tension and discussion in recent decades, particularly in times of great domestic and international organizational changes like those that followed WWI, WWII, and the dissolution of the Soviet Union. However, the concept of autonomy and the use of autonomous region formations can be observed in history much earlier. Indeed, some of the loose territories and "state-like" structures of early Asian empires, such as the Mughal's India and the millet system of the Ottoman Empire, encompass early examples of regional autonomy and self-government (Ghai and Woodman, 2013, 7). The history of contemporary autonomous regions is inherently connected to the decolonization period following WWI and WWII, and especially the formation of the modern international state system following WWI and the fall of most of the globe's remaining colonial empires, including the German and Ottoman Empires. The literature highlights two primary purposes of autonomous region formation during this decolonial/empire deconstruction period that contributed to its rise in the international system at the time. First, autonomous formations were advocated to accommodate communities with former colonies who wanted to secede from the larger state because of its distinct ethnic makeup. Second, autonomous formations were pursued in order to reorganize the relationship between colonial authorities and their colonial subjects without granting full independence to those subjects (Ghai and Woodman, 2013, 8-9).

Autonomy and autonomous region formations have evolved over the decades and have played important, although often overlooked, roles in many of the contemporary world's social

and political conflicts. Interestingly enough, from 1989 to 1995 more than half of all major armed conflicts were "state formation" conflicts (over the territorial configuration of a state) rather than "civil war" conflicts (over government). Before 1991 government control issues dominated major armed conflicts, after 1991 this changed to state formation issues. State formation conflicts include challenges to the state including succession, external attack, or movements to restructure the constitutional basis for the state which includes issues involving territorial autonomy (Nordquist, 1998, 59-60). Autonomous formations have become a major staple in the tools and tactics adopted in domestic and international conflict resolution efforts. There are many examples that showcase how autonomous region formations as a conflict resolution mechanism are both a valid theoretical and practical option for resolving internal conflict as shown in the examples of Corsica, the Aland Islands, the Faroe Islands, and Catalonia to name a few (Heintze, 1998, 10-12).

The principles of autonomy and the formation of autonomous regions have been advanced as a result of the development of a more encompassing international law and universal human rights doctrine. Universal human rights doctrine and international law have ushered in an era of standards for the treatment and representation of minority and marginalized peoples across the globe. The doctrines enshrining democratic values such as equality, political/economic participation, and self-determination further legitimize bids for autonomy and encourage members of marginalized groups to organize and pursue their collective goals rather than accepting their circumstances (Heintze, 1998, 12-13).

Despite the often optimistic or emancipatory assumptions of autonomy and the formation of autonomous regions, these processes can both advantage and disadvantage these marginalized groups. The formation of an autonomous region can serve the agenda of the marginalized group

attempting to expand its autonomy and advance its self-governing agenda. However, it can also manifest as a denial of citizen rights for these groups, isolation from the overarching state system, and be used simultaneously as a mechanism for granting marginalized groups a level of independence tolerable for conflict resolution (avoiding increasing domestic conflict) while ultimately denying bids for secession from this system outright (maintain territorial and national integrity). The way in which autonomy and autonomous regions benefit or disadvantage these actors depends on the context in which the mechanism is being applied. As will become clear in the cases adopted in this paper, bids for autonomy and autonomous region formation in the Kurdish contexts are characterized by the group's genuine bid for territorial autonomy, independence, and self-governance from the state systems in which they exist. In other cases such as the Israel/Palestine conflict (among others), although not expanded on beyond this brief mention in regards to this mechanism, increased autonomy and the formation of autonomous regions have been considered, never gained serious ground or resulted in major conflict resolution gains, and is contested by Palestinians who do not seek autonomy within the Israeli system, but seek outright independence from the Israeli state. Notions of territorial autonomy and non-territorial autonomy for Palestinians, are critical factors underlying the two-state or one-state solution debate surrounding the conflict. Conflict dynamics and application of mechanisms of autonomy and the formation of autonomous regions specific to the Israel/Palestine conflict will not be further expanded on in this paper but can be explored in Ephraim Nimni's, *The Twilight of the Two-State Solution in Israel-Palestine: Shared Sovereignty and Nonterritorial Autonomy as the New Dawn* (Nimni, 2020). Ultimately, the Israel/Palestine case highlights dynamics where the principles and mechanisms of autonomy and the formation of autonomous regions can be counterproductive to a group's bids for self-governance and overarching political agenda,

challenging an interpretation of the phenomena that centers on positive outcomes for marginalized groups.

2.4. Review of Relevant Literature, Previous Studies

The utilization of autonomous region formation as a method of nation-building following the WWI, WWII, and post-Soviet era and as a conflict resolution mechanism has greatly inspired scholarship and research into the political phenomena. One of the earlier collections of literature focusing on autonomy and the formation of autonomous regions is Markku Suksi's *Autonomy: Applications and Implications* (Suksi, 1998). The nineteen chapters in the collection represent some of the earlier works contemplating, discussing, studying, and defining the concept of autonomy, the applications of autonomous region formation, and the impact the phenomena have on the larger field of political science. Suksi's work provides some of the theoretical and practical building blocks for future works focusing on concepts of autonomy and autonomous region formation. Paul C. Stern and Daniel Druckman's work *International Conflict Resolution After the Cold War* (Stern and Druckman, 2000), spearheaded by the National Research Council, is a collection of works that further explores and contemplates the role that autonomy and autonomous formations play in the larger realm of conflict resolution. Building off of the works of Suksi, this collection provides a nuanced application of the concept to real-world international conflict dynamics.

Some of the most relevant literature specifically on the "formation" of autonomous regions, and the factors that impact the success or failure of such, come from the works of Yash Ghai who developed a theory for the formation of autonomous regions which was outlined in their article *Autonomy as a Strategy for Diffusing Conflict* (Ghai, 2000) in the larger publication

International Conflict Resolution After the Cold War (Stern and Druckman, 2000). Ghai's theory outlines the circumstances and actions in a given society that make for successful attempts at the manifestation of an autonomous region. Introduced as propositions in their text, the theory highlights the causal relationship between the circumstances and actions that are present in the society at the time of successful autonomous region formation. The theory is very generalizable and focuses on characteristics that can ideally be applied to a wide variety of real-world cases. Additionally, Ghai's theory provides the theoretical foundation for which future studies can be executed, cases compared, and the theory tested, as was the case in Ghai's future work.

In Yash Ghai and Sophia Woodman's later study, *Practising Self-Government : A Comparative Study of Autonomous Regions* (Ghai and Woodman, 2013), Ghai's theory (Ghai, 2000) and the circumstances and actions they propose that lead to the successful formation of an autonomous region is systematically tested via analyzing a series of country case studies of successful autonomous region formation. The study includes several unique cases including Quebec (Canada), the Aland Islands (Finland), Puerto Rico (United States), South Tyrol (Italy), Kashmir (India), Norfolk Island (Australia), Catalonia (Spain), Zanzibar (Tanzania), Bosnia-Herzegovina, Hong Kong, Scotland, Macau, Bougainville (Papua New Guinea) which were all carried out by contributing authors to the larger text. In each of these case studies Ghai's theory is tested by qualitatively analyzing criteria favorable to the granting of autonomous status including those factors positive to autonomy (If the state underwent regime change, if the international community was involved in conflict resolution, the relative size and resources available to the autonomous region compared with the state, if the state has established tradition of democracy and rule of law) and those factors negative to autonomy (is there several ethnic groups involved, is autonomy solely based on ethnicity, is sovereignty disputed). (Ghai, 2000 &

Ghai and Woodman, 2013). Additionally, Ghai's 2013 study also analyzes factors facilitating the actual exercising of autonomy by autonomous groups (continuing international involvement, participatory and democratic negotiations, built-in consultation mechanisms, constitutional entrenchment, independent dispute resolution, clear division of powers) (Ghai and Woodman, 2013). Findings from Ghai and Woodman's original study can be seen in Table 1.1. and Table 1.2..

Table 1.1. Factors Favourable to Granting of Autonomous Status, at Time of Establishment. Weighting of Conditions at Time of Establishment of Autonomy (0 = None at All; 5 = Absolutely)							
	Factors positive to autonomy				Factors negative to autonomy		
Autonomous Unit	Regime Change	International engagement	Small unit, few resources	Tradition of democracy, rule of law*	Autonomy based on ethnicity	Disputed sovereignty	Total (positive factors minus negative factors)
Aland Islands	5	5	4	5	-4	-5	10
Bosnia-Herzegovina	5	5	3	1	-5	-5	4
Bougainville	4	4	3	4	-1	-4	10
Catalonia	5	0	0	1	0	-5	1
Hong Kong	4	5	3	0	0	-1	11
Kashmir	5	3	1	1	-4	-5	1
Macau	4	5	3	0	0	0	11
Norfolk Island	0	0	5	5	-1	0	9
Puerto Rico	5	3	3	5	-4	-3	9
Quebec	5	0	0	5	-4	-5	1
Scotland	2	0	0	5	0	-1	6
South Tyrol	5	5	4	1	-5	-5	10
Zanzibar	5	0	4	1	-1	0	9
*Within the state in which autonomy is situated							
Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

Table 1.2. Factors Facilitating Exercise of Autonomy (0 = Not at All; 5 = Absolutely)							
Autonomous Unit	Continuing international involvement	Participatory and democratic negotiations*	Built-in consultation mechanisms	Constitutional entrenchment	Independent dispute resolution	Clear division of powers	Total score: High = 30 Low = 0
Aland Islands	2	1	5	5	5	5	23
Bosnia-Herzegovina	5	0	3	4	4	3	19
Bougainville	4	5	4	5	4	4	26
Catalonia	1	4	4	4	4	3	20
Hong Kong	2	1	2	3	1	4	13
Kashmir	1	2	2	3	3	2	13
Macau	2	1	2	3	1	3	13
Norfolk Island	1	2	2	0	2	2	9
Puerto Rico	3	1	2	1	1	4	12
Quebec	1	4	5	4	5	4	23
Scotland	1	4	4	2	3	4	18
South Tyrol	4	2	3	3	4	4	20
Zanzibar	0	0	1	2	0	1	4
*At the time of the formation of the autonomy							
Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

The case studies and analytical framework produced by the study appear to reinforce the reasoning for the selection of the independent variables and highlight how these variables are correlational to the dependent variable (granting of autonomous status, exercising of autonomy). Although the table above shows the study's (Ghai and Woodman, 2013) findings empirically, the actual main content of the study, and the reasoning for which the scores on the independent variable are given, are developed for each case study using comprehensive qualitative methods such as an overview of the history of the case, relevant legal frameworks, political dynamics, and other contextual elements. Note that these scores exist on a scale, highlighting how autonomy as a concept is dynamic and how autonomous region formations equally vary in their characteristics and outcomes. Without a doubt, the study relies extensively on qualitative and case study methodology to populate the analytical table. However, visualizing each case empirically as the table above does allows for a comprehensive framework to compare cases and their accompanying variables.

2.5. Key Debates and Gaps

Exploring the concept of autonomy, developing a theory of autonomy, and isolating the factors underlying the successful or non-successful formation of an autonomous region, have sparked debate among scholars in the field of political science. At the time of Suksi's work (Suksi, 1998) it was proposed that at the current state of political theory, there was little hope for identifying the factors underlying autonomy due to the vast amount of contextual elements that must be considered at the outset of theory development (Wiberg, 1998, 45-47). The questions and considerations outlined by Wiberg showed that a generalizable theory of autonomy that could address all of these elements in a satisfactory way did not exist and would be extremely

challenging to develop (Wilberg, 1998, 47). It was Yash Ghai's work (Ghai, 2000) that interacted with this debate and chose to solely focus on a theory centering on the actual factors underlying the successful formation of a territorial autonomous system rather than theorizing on the concept of autonomy at large. Given the vast contextual elements surrounding the phenomena, it became clear that research investigating these factors would adopt a primarily qualitative approach and rely on a series of case studies analyzed in a comparative study, as executed in the 2013 cross-case comparative study (Ghai and Woodman 2013).

Since the publication of the 2013 study, it has received feedback on some of its methodological gaps and shortcomings. While the variety of cases selected for the study shows an ample sample selection of relevant cases encompassing various contexts, this selection also raises concerns and challenges of comparability and analytical gain (Hanschel, 2014, 459-460). One of the chapter authors in the text highlights how the contextual differences between cases will tend to outweigh their similarities (Himsworth, 2013, 349). Additionally, the selection of cases for the study encompasses cases where there exists (or existed) an autonomous formation, limiting the sample group by not including those cases where autonomous formations have been (or are being) pursued but have been unsuccessful in doing so. A final gap in the study involves the geographic distribution of the cases selected. The cases all stem from various continents and historical backgrounds, but one major area of the globe, which also encompasses numerous contemporary issues involving autonomy and autonomous region formation, is omitted from the study: cases originating in the Middle East and North Africa (MENA) region. Here lies the analytical, methodological, and case selection gap which this paper seeks to address in the methodological and case study sections below.

Ultimately, Ghai's 2013 study is the culmination of previous scholars' works and studies that built up the scholarship and contributed to the theory development regarding autonomy and autonomous region formations. The study identifies key features and criteria relating to the formation of autonomy, factors contributing to effective autonomy, and the social and political consequences of autonomy arrangements on the larger society, and provides a comprehensive and applicable framework of analysis that can be adopted in future studies and tested with other cases left out of the original study, as will be done in this paper.

CHAPTER 3: RESEARCH DESIGN, CASE SELECTION, DATA, AND METHODOLOGY

3.1. Research Design

This paper's research design will emulate very similarly the design of Ghai and Woodman's original study into the formation of autonomous regions in their work *Practising Self-Government : A Comparative Study of Autonomous Regions* (Ghai and Woodman, 2013). The study, which is briefly reviewed above, provides an analytical framework and "guide" for which this paper seeks to develop further. While the analytical framework is impactful and adaptable to future research, as this paper will show, its methodological limitations, as noted above, provide areas of improvement that this paper will seek to address. Major limitations to the original study center around the substantial contextual gap that exists between the cases including challenging notions of comparability. Additionally, the selection of cases where autonomy has been achieved limits comparability to cases where bids for autonomy have been unsuccessful. A final limitation noted is the omitting of cases in the Middle East (or Middle East and North Africa - MENA) region. This chapter outlines the research design and methodological considerations that will be adopted to address these limitations, test the analytical framework created in the original study, and engage in a cross-case comparative analysis that will further develop the theories and literature involving the formation of autonomous regions. The cases included in this study have been selected with these limitations in mind and include the Kurdish autonomous regions in the Middle East and will be developed by exploring the political and historical contexts of state formation in the Middle East region at large, and then experiences of statelessness and manifestations of Kurdish bids for autonomy across different country cases:

Iraq (Kurdish Autonomous Region of Iraq (Iraqi Kurdistan)), Syria (Autonomous Administration of North and East Syria (AANES)), Turkey (Northern Kurdistan (Bakur)), and Iran (Eastern Kurdistan (Rojhelat)).

The Middle East region is a particularly relevant and insightful context for this topic because many countries in this region, especially those relevant to this research objective, have a shared history of pre-modern statehood under the Ottoman Empire, have experienced massive colonial projects that reshaped the international system in the wake of WWI, and encompass country cases that experienced a transition to the modern state system in a similar temporal period (albeit their experiences vary in different ways). Thus these countries have a shared point of departure for which comparative analysis will be very insightful, relevant, and have a level of controllability that doesn't exist in many other regional contexts. Additionally, centering the cases selected in this paper in one region will address some of the contextual comparability concerns raised in the original study.

The Kurdish cases, as a series of cases embedded in the Middle Eastern context (universe of cases), are unique in that they embody certain factors and avenues of analysis that could be observed, contemplated, tested, and then compared that would address some of the limitations of the original study and add a contribution to its overall findings. Two main factors are particularly relevant to the goals of this study: the Kurdish cases embody a shared history and the Kurdish cases all involve the same ethnic community. Similar to the Middle East context, only in the fall of the Ottoman Empire, and the subsequent formation of the modern state system, do we see a major divergence in the experiences of Kurdish society at a structural level. Previously under the umbrella of a much more centralized and shared entirety of the Kurdistan administrative region in the Ottoman Empire, Kurdistan today encompasses a territory spanning the modern states of

Iraq, Syria, Turkey, and Iran. By comparing these Kurdish cases, we have the ability to observe a shared history, a shared point of departure for the different cases, a shared regional ethnic community, and a more "controlled" or alike series of cases for which comparisons can be made.

Likewise, these country contexts encompass two outcomes of bids for autonomy and autonomous region formation - both established (Syria and Iraq) and unestablished (Turkey, Iran) cases. A comparison between these two categories (established and unestablished autonomous units) allows for the testing of the theory and analytical framework against both potential outcomes. This further addresses limitations identified in the original study, provides a sense of falsifiability and comparability between these cases and the cases in the original study, and has the potential to highlight some of the crucial factors that influence the formation of autonomous regions more generally.

Additionally, the Kurdish people today are uniquely connected in their civil society, merely separated by relatively porous borders between relatively newly formed states. Thus, there exists a strong civil society and Kurdish organizations that span the Middle East region and the four countries explored in the case studies. Suppose policies or actions adopted by this shared civil society can be identified and initiated by a central Kurdish authority across these territories, variations between cases in the actual manifestation of these policies can be attributed to the host state context in which these communities exist. Nowhere else in the present world, at least that is apparent to the author at the time of developing this study, is this type of comparison possible to the extent that it is in the Kurdish context in the Middle East. This is even more exciting when we consider fieldwork opportunities investigating autonomy in its non-territorial contexts.

3.2. Method

For the purpose of this research objective, and emulating the original comparative study (Ghai and Woodman, 2013), a primarily qualitative approach will be used in exploring and investigating the formation of autonomous regions in the Kurdistan context. By adopting a regionally contextualized multi-case comparative methodology (Yin, 1984), this study aims to create a relatively controlled universe of cases, encompassing both established and unestablished cases, for which the theory of circumstances for successful autonomous regions (Ghai, 2000), and analytical framework and table (Ghai and Woodman, 2013), can be tested. In this light, the study is deductive in nature and will take the theory and analytical framework from the previous study, which outlines the independent variables, causal mechanism, and dependent variable outcome, and be applied to the specific country cases of this paper. Utilizing this analytical framework, the general theory will be tested against the category of cases, successful and unsuccessful attempts at autonomous region formation, and between each of the cases in a comparative analysis. If the theory holds true, and the analytical framework proves to have analytical gain, then the cases adopted in this study will more or less mirror similar cases with like scores and similar characteristics. Additionally, successful cases will be similar in characteristics and scores to those with established or strong autonomies, while failed attempts will be similar in characteristics and scores to those with weak or failed autonomies.

In addition, inductive logic will also be utilized because as I test the existing theory and highlight those causal mechanisms, I expect to find additional considerations that are not considered in the original study. I will add them to the analysis and suggest revisions to the analytical framework as appropriate.

3.3. Data Analysis, Methods Used to Analyze the Data

Yash Ghai's theory for the formation of an autonomous region, outlined in *Autonomy as a Strategy for Diffusing Conflict* (Ghai, 2000), encompasses two avenues of analysis for which the successful formation of an autonomous region can be assessed: circumstances and actions. Introduced as propositions in their text, the theory highlights the causal relationship between the various independent variables (circumstances and actions categories) and the dependent variable (autonomous region formation). In Ghai's later study, *Practising Self-Government : A Comparative Study of Autonomous Regions* (Ghai and Woodman, 2013), these propositions were interpreted, condensed, and transformed into an analytical table that was applied to a series of cases. (As shown in Table 1.1. and Table 1.2.). For the purposes of this study and the belief that a qualitative approach will be most successful in encompassing the contextual variety between cases, the case-study approach and analytical framework and table previously created by Ghai (Ghai and Woodman, 2013) will be adopted. This has been shown to allow for greater interpretation and contextual inclusion in the data collection rather than relying on a strictly binary (yes/no) or empirical input alone which ultimately skews our understanding of these contextual elements and findings by reducing them to unrealistic assumptions about the variety of factors underlying each of the cases. The adapted analytical table will then be applied to each of the countries and Autonomous Unit cases investigated in this study. Each table (Table 2.1. & Table 2.2.) encompasses various factors that impact the formation of an autonomous region and the actual exercise of autonomy within those places.

Table 2.1. Factors Favorable to Granting of Autonomous Status, at Time of Establishment. Weighting of Conditions at Time of Establishment of Autonomy (0 = None at All; 5 = Absolutely)							
Factors positive to autonomy					Factors negative to autonomy		
Autonomous Unit	Regime Change	International engagement	Small unit, few resources	Tradition of democracy, rule of law*	Autonomy based on ethnicity	Disputed sovereignty	Total (positive factors minus negative factors)
Iraqi Kurdistan (Iraq)							
AANES (Syria)							
Rojhelat (Iran)							
Bakur (Turkey)							
*Within the state in which autonomy is situated							
Adapted from: Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

Table 2.2. Factors facilitating exercise of autonomy (0 = Not at All; 5 = Absolutely)							
Autonomous Unit	Continuing international involvement	Participatory and democratic negotiations*	Built-in consultation mechanisms	Constitutional entrenchment	Independent dispute resolution	Clear division of powers	Total score: High = 30 Low = 0
Iraqi Kurdistan (Iraq)							
AANES (Syria)							
Rojhelat (Iran)							
Bakur (Turkey)							
*At the time of the formation of the autonomy							
Adapted from: Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

Once each of the country case studies has been executed, and their accompanying analytical table filled out with support from the detailed qualitative analysis, an interpretation of the findings will ensue and a comparative analysis will be carried out between each of the country case studies, the outcome categories (success and failure at autonomous region formation), and finally to the other cases in the original study. This will provide the initial test of the theory's causal components, and then a comparison between all the country cases in this study and the original study will be conducted to highlight variables essential or nonessential for the manifestation of the dependent variable.

For the collection of data used to build out the case studies and fill out the table, this study will rely extensively on secondary sources outlining the history and political make-up of the Middle East region, the country cases, and the autonomous regions themselves. These sources include historical documents and summaries but will also include references to legal frameworks and policies adopted by the autonomous region, the state, and the international community. Primary sources involving non-state, state, and international community actors at relevant junctures of the case studies may include document analysis of constitutions, legal agreements, treaties, and other policy/legal-related content. Utilizing archival collection techniques will be essential in sourcing these primary sources.

3.4. Ethical Considerations

Ethical considerations for this research endeavor include recognizing and understanding the contested nature of autonomous regions in the countries they exist, the challenges that they pose to the modern international state-based system, and the marginalized nature of these regions and the populations' experiences and perspectives regarding autonomy, self-determination, and sovereignty. In recognizing these, the study will attempt to include material from a variety of sources from various origins, including from the most localized point of analysis, in a good-faith effort to gain a more accurate perspective of the political phenomena and the communities that are impacted by bids for autonomy.

It is an ethical consideration that any study involving the experiences of marginalized communities must recognize the importance of data collection that allows for the integration of the perspective of these communities into the study. These methods are primarily qualitative and result in primary sources collected via in-country/in-context fieldwork, participant observation,

interviews and surveys, and ethnography. Given the limited ability of the author to execute this type of data collection at this time, recognition of the lack of this type of data collection as a methodological limitation should be noted and will be noted in the concluding remarks of the study along with prospects for future fieldwork incorporating this type of data and bolstering the analysis and results of the study.

Additionally, the generalization of a theory for the formation of autonomous regions is an exciting prospect but relies on serious theory and framework development efforts, application of this framework to a much larger universe of cases, and a massive appreciation of the historical, social, and political contexts in which autonomous regions and efforts to establish them exist. The process of fully testing the theory to the extent of substantial comparability, generalizability, and full falsifiability would be extensive and require collaboration across the subfields of political science and with other disciplinary fields within the social sciences, such as anthropology, sociology, geography, etc. Recognizing the extensive nature of such an endeavor, this study seeks to develop a 'proof of concept', further test an analytical framework that can be adopted as a guidepost for testing the theory against other cases of autonomous region formation, and serve as an olive branch to other social scientists and researchers from other disciples for collaboration on future research endeavors.

CHAPTER 4: CASE STUDIES

The presentation of the qualitative data collected during the research and historical/legal analysis process will be shown in their respective case studies. First, this paper will introduce the broader background and history of the Middle Eastern and Kurdish contexts and the overarching shared history that makes these cases comparable and ripe for analytical gain, addressing one of the gaps identified in Ghai and Woodman's previous study (Ghai and Woodman, 2013). Then, the paper will explore the established cases of autonomous region formation in the cases of Iraq and Syria followed by the unestablished attempts in the cases of Turkey and Iran. The findings of the research methodology outlined above will subsequently populate and highlight some key components for which the formation of autonomous regions can be analyzed in the accompanying analytical table adapted from Ghai and Woodman's original study (Ghai and Woodman, 2013).

The overall objective of this chapter is to build out the regional and country historical and political contexts for which our autonomous units exist. During this research and collection process, each case study will provide a brief history of the Kurds and their experiences with establishing autonomy and highlight some key events or happenings impacting the formation of the autonomous unit. This collection phase will provide the contextual and subject matter foundation for which analysis and interpretation can be carried out in likeness to the original study and the factors underlying autonomous region formation and effective exercise of autonomy identified in Ghai's theory. First, the paper will summarize the "point of departure" between the cases, which have a shared history, in the section immediately below. Then the

country case studies will take place. Following the case studies, major takeaways from the case studies and an expansion of shared contexts, events, and factors overlapping the region and the country cases will be summarized.

4.1. The Middle East Region, Greater Kurdistan, and The Kurds

The case studies adopted in this comparative analysis all originate from the Middle East region, the historical territory of Greater Kurdistan, and the ethnic group of the Kurds. As such, a brief historical summary of the region to further contextualize these cases is in order. There is no central Kurdish state or entity under which these peoples fall in our contemporary world, instead, they fall under the banner of the modern states of Iraq, Syria, Iran, and Turkey.

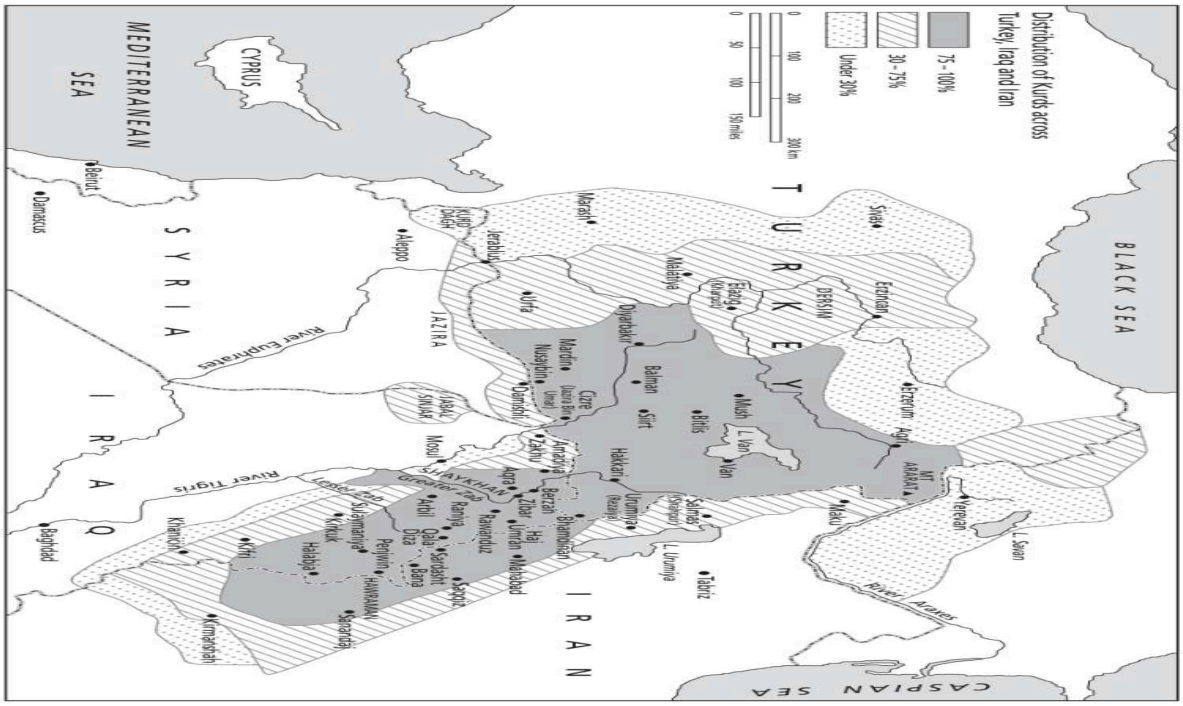

Figure 2. Distribution of Kurds Across Turkey, Iraq, Syria, and Iran (Kaya, 2020)

Before WWI, while under the Ottoman Empire (and related Millet System), the Kurds enjoyed relative sovereignty and unity under the banner of a unified “Kurdistan " administrative

region. The autonomous Kurdish territory of the Ottoman territories where Kurds were the majority included the *vilayets* (provinces) of Diyarbakir, Harput, Bitlis, Van, Mosul, and the *sancak (*administrative division) of Urfa (Ozoglu, 2004, 38-40 & Yildiz, 2005, 6). In the wake of WWI and the fall of the Ottoman Empire, this territory, including the administrative Kurdistan region, was dismembered. This process left the Kurds with no central, sovereign, or state entity under which to unite, leaving them stateless in a modern state system. Foundational to the historical and legal processes that took place during the WWI period are legal concepts of *pragmatism*. Pragmatism as a legal jurisprudence is characterized by the recognition following WWI of the colonial nature of international law, a massive effort to decolonize the territories formerly under the system of empire, the establishing of modern nation-states and the granting of self-determination to these states, and the establishing of a series of international institutions and legal frameworks to facilitate the interactions between states (Sinclair, 2018, 843-844 & Anghie, 2006, 741, 746-748). U.S. President Woodrow Wilson, during WWI and immediately following, advocated for the principle of self-determination and insisted that it be recognized and formally established in the post-WWI era (Ikenberry, 2020, 212). With the fall of the German, Austria-Hungarian, and Ottoman Empires, and the subsequent carving of their territories in the Treaty of Versailles (1919) and Treaty of Sevres (1920), respectively, a newly formed system of modern states was established. While self-determination became a major characteristic of the international system following the war, there was an understanding among Western states (the victors of WWI) that many of the territories formerly under the rule of the Germans and Ottomans (the losers of WWI), and the modern states created in these territories, were not ready for outright independence (Sorensen, 1998, 81-82). To create the framework necessary for independence, the victors of WWI founded The League of Nations, facilitated the

implementation of the Covenant of the League of Nations (1919), introduced the Mandate System (1920), and engaged in a prolonged effort of interventionism in newly formed states to build new institutions, national unity, and economic base necessary for granting these states independence and sovereignty (Sorensen, 1998, 81).

Under Article 22 of the Covenant of the League of Nations, "certain territories detached from Turkey (Ottoman Empire) could be provisionally recognized as independent nations…subject to the rendering of administrative advice and assistance by a *Mandatory* until such time as they can stand alone…" (Crawford, 2006). Territories detached from Turkey (Ottoman Empire) as a result of Article 16 of the Treaty of Lausanne (1923), and subject to the terms of the Mandate System and foreign administration (1920), labeled as 'A' Mandates, include Iraq (Great Britain), Palestine (Great Britain), Transjordan (Great Britain), Syria (France) and Lebanon (France). Armenia was also originally supposed to be under a mandate administered by the United States, but the United States refused. Part of Armenia was then recaptured by the Turks and part was captured and converted into a soviet republic in the USSR (Crawford, 2006). Under another series of agreements and negotiations, discussed in more depth below, the modern Turkish Republic was formed and its territory established as it is in our contemporary. The Treaty of Sevres (1920), signed by the Allied Powers of WWI and the Constantinople government, outlined ambitions of independence for minority groups, mainly the Armenians, Hajaz, and the Kurds, in article 64 (Yildiz, 2005, 7). However, as a result of a series of factors including the lack of faith the Allies had in the Kurds to effectively govern the territories of Greater Kurdistan, the threat of Soviet influence over newly formed states, and the Turkish War for Independence and the rise of Mustapha Kemal Ataturk, the Treaty of Sevres was never ratified by signatory countries (except for Greece) and the provision outlining Kurdish autonomy was never

implemented in the newly formed Mandate states (Yildiz, 2005, 7). Following the Turkish War for Independence in 1923, the Treaty of Sevres was replaced by the Treaty of Lausanne (1923) which established the modern borders of the Turkish Republic and reallocated Kurdish autonomous territories (outlined in the Treaty of Sevres) to Turkey, Syria, and Iraq (Yildiz, 2005, 7-8). In other words, all major European actors in the region, including the British and the French, and the regional powers, including Turkey and Iran, agreed that there was not going to be an independent Kurdish state. Kurds were therefore left out of these negotiations and agreements and the historic region of Greater Kurdistan was divided.

The outcome of this structural reorganization and implementation of the modern state system was simultaneously the formation of modern states in the Middle East and the resulting statelessness of the Kurds. Today, the Kurds are the largest ethnic people without a state with substantial numbers of Kurds living in the West and most, about 30 million, spread across the modern states of Iraq, Syria, Turkey, and Iran where they make up a substantial minority of the population. In Iran and Syria, Kurds make up an estimated 10% of the overall population. In Iraq, 18%. The Kurdish population in Turkey is substantial and can be difficult to determine, but estimates place it around 18-22% of the total population (Patton, 2013, 492 & Ariav, 2019).

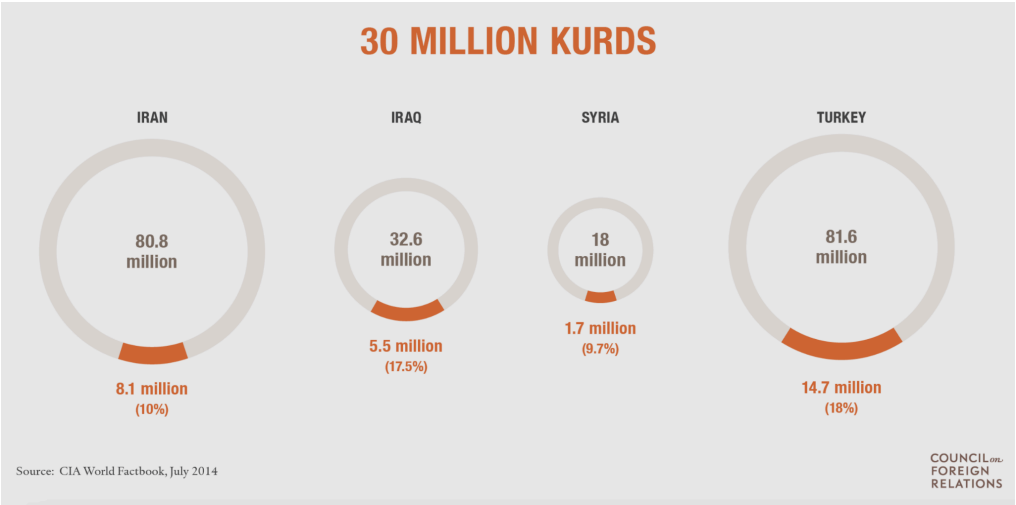

Figure 3. Population of the Kurds in Iran, Iraq, Syria, and Turkey (Ariav, 2019)

Kurdish political and opposition movements seeking autonomy from this system are highly contested and suppressed in these modern states - highlighted in a slew of conflicts existing between these modern states and Kurdish opposition, militia, and independence organizations in Iraq, Syria, Iran, and Turkey. Because this modern state system is now the status quo for sovereignty, statehood, and interaction among states in the international system, and those states have an intrinsic interest in upholding this status quo (and resisting social movements that undermine this status quo and thus the foundation of a state's statehood and sovereignty), Kurdish bids for autonomy and the formation of affiliated autonomous regions are contested and as such manifest very differently between the modern states overlapping with historical Greater Kurdistan territories.

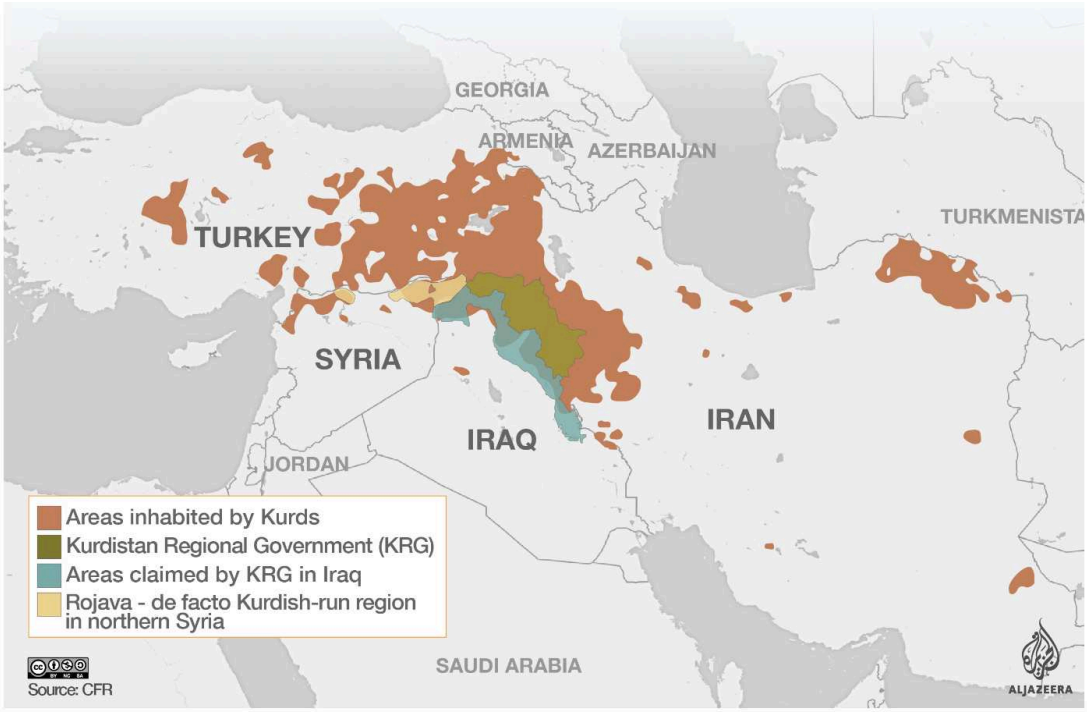

Figure 4. Kurdish dominant/controlled areas in Turkey, Syria, Iraq, and Iran (Al-Fifai & Mohsin, 2017)

In Iraq, this change manifested in the formation of the Kurdish Regional Government (KRG) of Iraq, also known as Iraqi Kurdistan, following the overthrow of the Ba'athist regime in 2003. In Syria, this change in the organization of society is embodied in the establishment of the Autonomous Administration of North and East Syria (AANES), formerly known as Rojava before being expanded and renamed at the Third Conference of the Syrian Democratic Council (SDC) in 2018. Both of these autonomous regions show the change in the organization of society envisioned by Kurdish autonomous movements (although recognizing this is not the establishment of a separate "state" entirely, but is the most realistic manifestation of autonomy and sovereignty for those organizations outside of the modern state), and also emphasizes that the conditions do exist for the granting of autonomous region formation in specific contexts in the Middle Eastern and Kurdish contexts. As noted above, Kurdish autonomous movements in

Turkey and Iran have proven to be much less successful in this sense. Bids for Kurdish autonomy in these countries can pose such a massive threat to the state that these groups can be categorized as domestic and international terrorist organizations and are combated in both domestic and international counterterrorism operations. As will be further investigated, these four country cases, and their embedded "autonomous units" showcase the variety of autonomy and autonomous formation outcomes in the Middle Eastern and Kurdish contexts.

It is from this point in history after WWI, the dividing of the Ottoman territory and Greater Kurdistan, the creation of modern Middle Eastern states, and the implementation of the mandate system, that we see a major divergence in the Kurdish experience and provides an apt background and summary of similarities between cases for which contextual "likeness" can be established, addressing a limitation or gap of the original study, and serve as a point of departure for our case studies to begin. First, we will investigate the "established" cases of autonomy and autonomous region formation in Iraq and Syria. Then, we will investigate the "unestablished" cases in Iran and Turkey.

4.2. Iraq and Iraqi Kurdistan

The Kurdish Autonomous Region of Iraq, also known as Iraqi Kurdistan, was established after a series of events throughout the 20th and 21st centuries coalesced into a political environment susceptible to establishing the first legitimate Kurdish autonomous zone in all of Greater Kurdistan. The establishment of Iraqi Kurdistan, and its governing entity the Kurdistan Regional Government (KRG), had a profound impact on the Kurds and their ambitions for greater autonomy and the formation of autonomous regions throughout Syria, Turkey, and Iran. As this paper's sole fully legitimate autonomous region, Iraqi Kurdistan serves as the premier

example of a successful attempt to establish territorial autonomy and the structural factors that exist for the creation of such.

Figure 5. Kurdish Populated and Controlled Areas (Kaya, 2020)

The political dynamics of Iraq from its independence in the 1930s, to the rise of the Arab Socialist (Ba'th) Party in 1963, the rise of Saddam Hussein in 1979, and the post-Saddam and Ba'thist Iraq have been characterized by instability and violence across the country. The political independence of Iraq came much earlier than many of the countries in the Middle East region. In 1932 independence for Iraq was brought about as a result of a series of agreements between the United Kingdom and Iraq (in 1922, 1924, 1926, and 1930) amending passages to the Treaty of Alliance (1922), amendments that outlined comprehensive measures to establish an independent Iraqi state (Crawford, 2006). The Iraqi case is unique as many other states established during the mandate system were dependent on gaining independence via the dissolving of the League of Nations in 1946, and thus dissolving of the mandate system, rather than by agreement within this

system. Early Kurdish opposition to the larger national Iraqi government was brought about by the mobilization of large numbers of Kurdish oil field workers around the city of Kirkuk by the Iraqi Communist Party in the 1950s (Lawson, 2013, 302-303). In 1959, continued fighting in the region over the years prompted the Qasim regime (1958-1963) to deploy armed forces against Kurdish groups and dismantle the Iraqi Communist Party. A few years later, and in the early years of the Kurdish Democratic Party (KDP), the KDP which consisted of a substantial fighting force continued to battle the Qasim regime until the *coup d'etat* that ousted Qasim who was replaced by the Ba'thists in 1963 (Lawson, 2013, 303). The Ba'thist regime gained initial support from the KDP because of their willingness to negotiate some sort of autonomous arrangement for the Kurds, a notion that would never manifest in the entirety of Ba'thist rule. In 1975, the KDP broke into two faction groups: the KDP and the PUK, the former would take most of its supporters across the border into Iran to avoid the forced migration by the Ba'thist regime to relocate large numbers of the Kurdish population from the north to central suburban cities (Lawson, 2013, 303). Kurdish history in Iraq truly became coherent and palpable in the country's domestic affairs when these two main Kurdish organizations, and the most important as far as advancing Kurdish interests and bids for autonomy, Mas'ud Barazani's Kurdish Democratic Party (KDP) and Jalal Talabani's Patriotic Union of Kurdistan (PUK), each of which having a mobilizable fighting force of around 10,000 personnel, began to work together in the early 1980s to represent, advance, negotiate, and protect Kurds and Kurdish interests (Baram, 1993, 45). During the 1980-1988 Iraq-Iran War, Kurdish militias played a central role in the fight against the Ba'thists in Iraq, culminating in a full-scale military offensive in Iraqi Kurdistan and the Halabja and Sayw Senan poison gas attacks on the Iraq-Iran border (Lawson, 2013, 303). This event

would prove to be a catalyst for Kurdish opposition and autonomous efforts initiated during the Kurdish Revolt.

In 1991, the Kurdish Revolt in northern Iraq saw the liberation of the whole of Iraqi Kurdistan but was subsequently followed by a Kurdish military defeat, driving KDP and PUK forces into the mountainous regions in the north and displacing some 1.5 million Kurds who fled to the Turkish and Iranian border regions (Baram, 1993, 45-46). Following the defeat, the Kurdish Front (led by the KDP and PUK) entered into negotiations with Saddam's Ba'thist government for the establishment of a Kurdish autonomous region in northern Iraq (that included the oil-rich city of Kirkuk in its territory (Rabil, 2002, 8)) with an independent militia, a share in the national budget proportional to the Kurdish population, and for proportional allotment of positions and representation of Kurds in the government, parliament, and the army (Baram, 1993, 46). Despite ongoing negotiations, the Saddam government established an economic embargo on Iraqi Kurdistan in 1991 and early 1992 which effectively stalled negotiations and led to calls from the PUK for an armed struggle to topple the regime and the doubt of ever achieving any sort of autonomous solution with the Saddam regime (Baram, 1993, 46).

Interestingly enough, the establishment of the embargo against Iraqi Kurdistan helped to create and effectively determine the hard borders of the *de facto* (not officially, but as a result of an administrative vacuum) autonomous territory. The boundaries of the embargo, and thus the autonomous region, extend from the meeting point of the Iraq, Syria, and Turkish borders in the west (near the city of Zakhu), then south and east following the mountains (west of Dohuk, east of Mosul, west of Erbil), then further southeast to the Iranian Border south of the town of Kalar. Note that the cities of Kirkuk and Mosul were left out of the embargoed region for strategic and economic purposes. The PUK hub of power is located in the city of Sulaymaniyah while the

KDP hubs are north in Erbil, Ranya, and Qal'at Diza. Also of note, over half of the territory defined in the embargo is located north of the thirty-sixth parallel and thus is under UN jurisdiction. Although under the UN umbrella, the Kurds have complete *de facto* control over the territory demarcated above (Baram, 1993, 46).

Figure 6. Disputed territories in Iraq (Blanchard, 2018)

Despite the immense pressure imposed on Kurdish populations in the autonomous region due to the embargo from the Saddam regime, the establishment of a clearly defined autonomous territory led to further development of its domestic politics. In May 1992, despite having been postponed by military and economic pressures from the embargo, and following the establishment of a 'no-fly zone' over southern Iraq (south of the 32nd parallel) and in the northern Iraqi Kurdistan region (north of the 36th parallel), a safe zone for Kurds (north of the

36th parallel) by the United States and United Kingdom, and withdrawing of the central authority from the region, Kurdish democratic parliamentary elections were held for the first time (Rabil, 2002, 10 & Baram, 1993, 46-47 & Lawson, 2013, 303-304). The elections were a huge success, not only in their participation and legitimacy, but also in advancing Kurdish politics and interests not just in Iraq, but across the Greater Kurdistan region. Eight parties participated in the elections, including the KDP and PUK. Six of the 'smaller' parties failed to pass the 7% threshold needed to get seats in the parliament. The KDP (50.22%) and PUK (49.78%) nearly tied and were given fifty seats each in the 105-member Kurdistan National Assembly. Five seats were allocated to Christian minorities (Baram, 1993, 46-47 & Rabil, 2002, 10). The personal vote for the presidency was between KDP candidate Barazani (466,819 votes) and PUK candidate Talabani (441,057 votes). Neither of the candidates met the 51% threshold required to obtain the presidency but to avoid divisions and promote the well-being of the larger Kurdish Front, the second round of presidential voting was deferred, and Iraqi Kurdistan, along with its newly formed parliament the Kurdish National Council, proceeded without a president. In June 1992, the Kurdistan National Council elected the Kurdish Regional Government (KRG) headed by PUK's Fu'ad Ma'sum whose priorities moving forward were the promotion of economic reconstruction of the region, creating a constitution for Iraqi Kurdistan, and establishing a civil service program (Baram, 1993, 47). Free and democratic elections would continue to be held in Iraqi Kurdistan up until the most recent elections in our contemporary, indicating a clear commitment by the autonomous unit to the rule of law and democratic values in the society.

Developments in Northern Iraq and Kurdish autonomy also have an international dimension that can be investigated. The embargo and consolidation of Kurdish territory, domestic political development in Iraqi Kurdistan, and the 1992 elections had major implications for the

events unfolding in the Middle East, neighboring countries, and the larger international community. The elections in 1992 raised some concerns from Turkey over a rising force and challenge on their southeastern border. Both the KDP and PUK assured the Turks that the elections were aimed at filling an administrative vacuum, not establishing a separate state and that Iraqi Kurdistan would have the right to autonomy and self-determination in a post-Saddam Iraq (Baram, 1993, 47). Additionally, the Kurds, being largely secular and pro-West would leverage their relationship with the United States to ease tensions with Turkey through diplomatic channels, sure up their military capabilities and economic development with Western and UN support, and take advantage of the no-fly zone over the territory enforced by the United States and United Kingdom, in exchange for providing an area for which the allies in the Gulf War could stage their operations against the Saddam regime in Iraq (Baram, 1993, 50).

Likely the most important event that took place during this time was the Gulf War (1990-1991) and subsequent planning by Western forces on how to halt the invasion of Kuwait and circumvent, dismantle, and eradicate the Saddam regime from the seat of power in Iraq. The Vienna Conference (1992) marked a decisive shift in Iraqi Kurdistan's bids for autonomy and legitimacy in the international community. The conference saw the coalescing of no less than forty organizations (most small and disorganized, except in the case of the Kurds) united in opposition to Saddam's government. The conference called for the unseating of the Saddam regime, the establishment of a true democracy in the country, and the revising of the country's constitution (Baram, 1993, 50-52). The main outcome of the conference saw the forming of an executive board and a general board empowered by the international community to conduct all international affairs and contacts for the Iraqi people, effectively serving as an alternative to the Saddam regime called the Iraqi National Congress (INC) (Rabil, 2002, 9-10). A resolution

calling for the boards to be located in Iraqi Kurdistan, and declare them as an interim government, was never passed. However, the final resolution officially promised Kurdish self-determination and the formation of a fully autonomous Kurdish region within Iraq (Baram, 1993, 50-51). The events and resolutions of the Vienna Conference solidified an optimistic future for the Kurds in Iraq, however, much of the long-term objectives for fully enshrined autonomy for Iraqi Kurdistan, and proportional representation in the Iraqi system, depended on the continued eradication of Iraqi forces and the Saddam regime by their Western allies (Baram, 1993, 50-52). Syria was one of the first regional countries to bolster its relations with the newly formed INC by holding multiple conferences in Damascus with Iraqi opposition organizations to discuss a unified plan of action, offering to open bases for and support military operations, and open a military headquarters for the Iraqi opposition in the Iraq/Syria/Turkey border region. Turkey, as a key coalition ally, was complacent in allowing the building of bases in the border region, although it had reservations about military operations targeting Iraqi forces (Rabil, 2002, 7-9). The strengthening of ties was both welcomed and drew speculation that Syria was looking to strengthen its leverage in the region and expand its coordination efforts with the US-led coalition against the Saddam regime (Rabil, 2002, 7-9). Iran's response to these happenings in the region was largely concerned with the United States hegemonic role in the future of Iraq and the larger region. As such, Iran seemed to adopt a contradictory position towards the Kurds and the Saddam regime by simultaneously carrying out secret meetings with the Saddam regime and assuring the Kurds that these activities would not affect their activities (Rabil, 2002, 7-9). Ultimately, both Syria and Iran believed that the Saddam regime would fall and began preparations for the future.

Following the initial democratic elections and the formation of an Iraqi Kurdistan government, political dynamics became more turbulent in the autonomous region. The KRG elected in 1992 was dissolved in 1994 when the territory broke out into a civil war between the PUK and KDP. In 1996, in a turn of events, the KDP requested support from Iraqi armed forces in their fighting with the PUK, resulting in the division of the autonomous region into two administrative regions led by the KDP (headquartered in Hewler) and the PUK (headquartered in Sulaymaniyah), both claiming to be the legitimate government administration of the autonomous region. In 1998 the civil war ended when the United States negotiated a peace treaty between the KDP and PUK, resulting in shared administrative power over the region (a KDP & PUK administrative region) (Rabil, 2002, 10-11). This same year, in response to continuing delays by Saddam to allow UN inspectors to carry out their duties in the country, the United States Congress issued the Iraq Liberation Act of 1998 which set regime change in Iraq as a US foreign policy objective and the support of a transition to democracy headed by the INC (Rabil, 2002, 11). In the following years, extensive efforts on behalf of the INC, the US, and other opposition organizations took place to solidify a unified position and plan for the future of Iraq which hinged on direct American intervention (Rabil, 2002, 11-12).

In 2002, the KDP issued a draft constitution for Iraq that outlined the power-sharing agreements and Kurdish goals of establishing a fully recognized autonomous region in Iraqi Kurdistan. Under the constitution, the country would adopt democratic rule and a system of federal union with established Arab and Kurdish regions. As such, the Kurdish region consists of the historic Iraqi Kurdistan and calls for the repatriation of all Kurds displaced from the region and the expatriation of Arabs who were relocated there by the Saddam regime (Rabil, 2002, 13). Arabic would be the official language of the Arab region, while Kurdish would be the official

language in Iraqi Kurdistan. There will be an establishment of a federal parliament made up of national and regional assemblies where regional assemblies would be on equal footing with the national in their federal legislative powers. Every region would have its constitutions with the inclusion of rule by a national Iraqi republic and federal conditional. Each region would have an independent judicial system, president, prime minister, and council of ministers. For taxation, the federal union would deal with customs taxes while each region collects all other taxes (Rabil, 2002, 13). The KDP and PUK approved the draft constitution with amendments that outline the structure of the regional administration in Iraqi Kurdistan (legislative, judiciary, and executive responsibilities) and ambitions to create a flag and make the city of Kirkuk its capital (Rabil, 2002, 13-14). Turkey, wildly against the possibility of Iraqi Kurdistan gaining full independence from Iraq, saw the draft constitution as suspicious and its military leaders warned that efforts to establish full independence would be encountered with the use of troops with potential troop deployments 200 miles into Iraq to hold Mosul and Kirkuk until the region is "stabilized" (Rabil, 2002, 14).

In 2003, following the fall of the Saddam Regime, the Iraqi Governing Council (IGC) was established and would eventually provide the foundations for which the Interim Iraqi Government would be built. The KDP's Barzani and PUK's Talebani would join the IGC at its outset and would serve as key members of the Interim Iraqi Government; Talebani would be appointed to the presidency (Lawson, 2013, 292). In the years following, the draft constitution laid out by the KDP would be adapted and brought on as the template for the new Iraqi constitution, including the enshrining of a fully autonomous Kurdish region in the northern zone of Iraqi Kurdistan (Lawson, 2013, 292, 297, 303). While its initial formation in 2003 was essential, its formation under the legislative framework of a legal federal institutional system in

the permanent Iraqi constitution in 2005 solidified its autonomy (Ababakr, 2023, 310, 315-316). Within this framework, Iraqi Kurdistan also has the autonomy to not only determine its own domestic policy in its territory but also engage in foreign policy-making under Article 121 of the permanent constitution. This foreign policy agenda has an expressed goal of building up a framework of autonomous recognition from the Iraqi state, potentially future separate-state recognition (although not official), by engaging with the international community as economic partners but also as critical counterterrorism partners in the region (Ababakr, 2023, 310). This foreign policy agenda includes agreements made with France, Germany, South Korea, Turkiye, Iran, the United Arab Emirates, Qatar, Lebanon, Egypt, Jordan, and international organizations such as the United Nations Education, Cultural, and Scientific organizations, and multinational corporations in the oil and gas, trade, education, infrastructure, agriculture and tourism sectors (Ababakr, 2023, 318). Clearly, Iraqi Kurdistan has recognized that pursuing an aggressive foreign policy agenda is an essential element of building up its statehood, independence, and sovereignty, proving that the region can be administered and maintain itself effectively, on both the domestic and international front, completely autonomously from the central Iraqi state. Additionally, Kurdish activists would go on to take steps to solidify its gains in Iraqi Kurdistan and make moves to expand its nation-building objectives, military capabilities, and foreign partnerships, and undertake efforts to annex adjacent territories including the city of Kirkuk and surrounding oil-producing districts, as seen in Map 5 (Lawson, 2013, 295-296, 304).

The history of Kurdish autonomy in Iraq, and the formation of the Iraqi Kurdistan autonomous region, provides an ample pool of information and conditions for which the autonomous region was formed. As the most concrete example of the successful formation of an autonomous region for the cases adopted in this paper, it serves as a strong example that can be

adapted into the analytical framework and table of the larger study (Ghai and Woodman, 2013). The cases of Syria, Turkey, and Iran below all encompass alternative outcomes of efforts to establish autonomy and an autonomous region likening to that in Iraq, highlighting how autonomy and the formation of territorial autonomy lie on a spectrum of factors and outcomes on a case-by-case basis. The following cases will further emphasize this dynamic.

4.3. Syria and the Autonomous Administration of North and East Syria (AANES)

The Kurdish autonomous region established in the modern state of Syria is called the Autonomous Region of North and East Syria (AANES), also known as Rojava, and is composed of the territories of Manbij, Euphrates, Jazeera, Afrin, Deir, Raqqa, and Tabqa. Established under a series of factors heavily influenced by the Syrian civil war and political, security, and administrative vacuums left by the withdrawal of Syrian forces from the northwest of the country, AANES is an example of how territorial autonomy can be achieved under a largely *de-facto* framework. Additionally, AANES highlights how efforts to establish territorial autonomy, even in the Kurdish cases, can represent the ambitions of minorities and minority groups from an array of ethnic, cultural, and religious backgrounds. As will become apparent from the ensuing sections, AANES provides a rich and unique case, and the most contemporary example of establishment, within those encompassed in this paper.

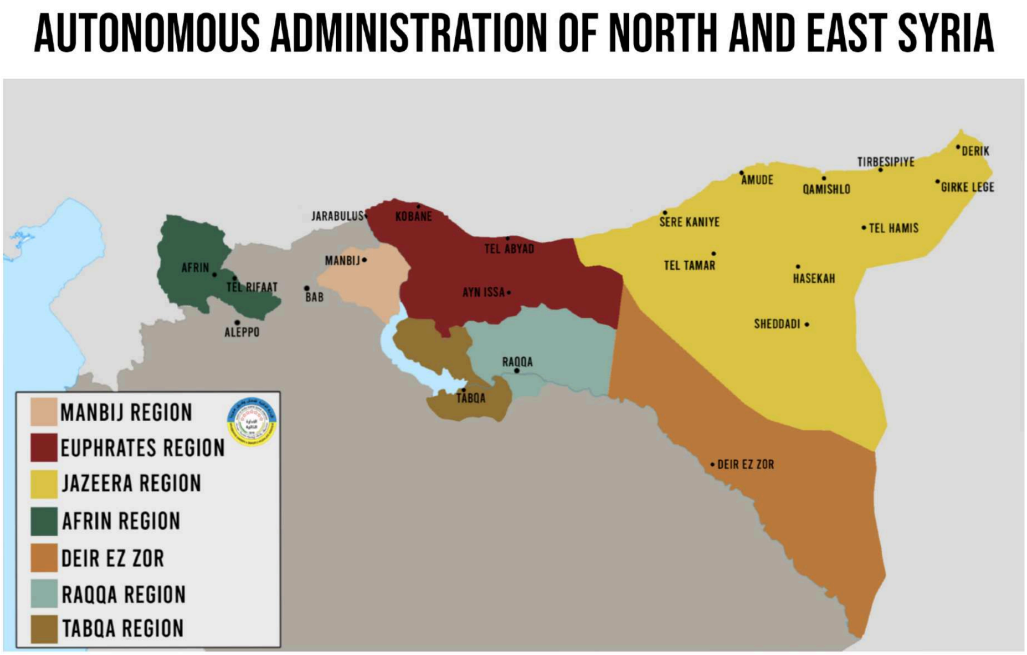

Figure 7. Autonomous Administration of North and East Syria (Syrian Democratic Council)

The political dynamics of Syria from its independence in 1946 to the rise of the Ba'th party in 1963, the rise of the Assad regime in 1970, and the ongoing civil war, Syria has been characterized by instability, violence, and civil war across the country. Except for the state of Iraq, full independence for most of the states established during the mandate system was dependent on the dissolving of the League of Nations organization, and thus the dissolution of the Mandate System. This was the case for Syria, Lebanon, and Transjordan, but only as a result of a slew of convoluted legal frameworks and negotiations as to what extent the mandate for these states truly needs to be dissolved. In Syria and Lebanon, for example, French military general and diplomat Georges Catroux proclaimed in 1941 the independence of Syria and Lebanon, but this independence was contested by the overseeing bodies of the mandate regime and was dependent on the recognition of independence by other states in the international system such as the United States (among others) (Crawford, 2006). Only during the full termination of

the League of Nations and the Covenant of the League of Nations in 1946 was the independence of these mandate states fully established and recognized by the international community (Crawford, 2006). In 1958, following a time of civil war and political instability, largely propagated by a series of successive military *coups*, Syria merged with Egypt and became the Northern Region of the United Arab Republic (UAR). Egypt's aggressive dismantling of Syrian political parties and extreme land reforms led to Syria's succession from the UAR in 1961 and set the stage for the Syrian Revolution (1963) (Lawson, 2013, 445). The Syrian Revolution saw the rise of the Ba'th party and a new political dynamic that would exist in the country until the present. The Ba'th party has dominated the political scene in Syrian politics and ruled the country almost exclusively since 1963, and the most prominent name in the party Assad (Hafez al-Assad and son Bashir al-Assad), has been the face of the party and held full power in the country, including the presidency, in Syria since the 1970s (Rabinovich, 2003, 11-13).

Early Kurdish opposition to the larger national Syrian government came as early as the end of WWI when Kurdish populations in the north, along with the Druze minority group, led armed resistance efforts against the French mandate government established in 1920. During the timespan predating the 1963 Revolution, the Kurds generally refrained from outright confrontation and opposition compared to other minority groups, such as the Alawis, Druze, and Ismailis, who made serious efforts to infiltrate the armed forces and the officer corps of the Syrian Military Academy (Lawson, 2013, 467). These minority groups received persistent discrimination and marginalization and gravitated towards the movements led by the Ba'th Party and the Syrian Social National Party and would carry out a series of *coup d'etat* events in the 1940s, early 1950s, and engineer the 1963 revolution itself (Lawson, 2013, 467). The Baath party, a largely secularist order when they rose to power in 1963, was generally accepted by other

minority groups such as Christians, Armenians, and Kurds for fear that another regime change may bring about an Islamist order (Lawson, 2013, 467). As such, Kurds were much better treated and assimilated in Syria than any surrounding countries (particularly in Iraq where the Saddam regime carried out extensive military operations against Kurdish communities in the north of the country) and rarely protested the Ba'ath/Assad regime. Most of the Syrian opposition movements during the late 20th century and the first few years of the 21st century centered around conflicts between the Druze and Sunnis. Additionally, a massive surge of Iraqi refugees (largely Sunni Arabs and members of the eradicated Iraqi Ba'th party) entered Syria fleeing the events of the U.S. Invasion, which posed serious challenges to the Syrian government and increased ethnic and sectarian friction across the country (Lawson, 2013, 467-468). However, in 2003, inspired by the gains of Kurdish opposition groups in Iraq and the establishment of an autonomous Iraqi Kurdistan, Kurds in northeastern Syria began to engage in communal activism and opposition movements (Lawson, 2013, 468). One such event in 2005 took place during a football (soccer) match in the city of al-Qamishli where conflict between Arab and Kurdish fans, largely influenced by the United States' invasion of Iraq to unseat Saddam Hussein, led to an attack against Kurds with makeshift weapons, rioting in the city and nearby towns, and the arresting of hundreds of Kurds by the security forces. A year later, Kurdish activists staged a protest at the High Court building in Damascus demanding an end to the country's long-running state of emergency which was broken up by Ba'th party-affiliated counter-protesters (Lawson, 2013, 468). When Jalal Talebani of the Patriotic Union of Kurdistan (PUK) was elected to the Iraqi Presidency in 2005, Kurds celebrated across Syria, particularly in Damascus, and Kurdish activists began calling for regime change. These statements were followed by the disappearance of Shaikh Mohammad Ma'shuq al-Khaznawi, a prominent Syrian-Kurdish activist, which again

inspired massive protests in al-Qamishli. Following the protests security forces arrested those suspected of organizing the protests along with the majority of Syria's civil rights activists (Lawson, 2013, 468-469).

In the wake of the Arab Spring (2011) which swept across the greater Middle East and North Africa (MENA) region, and amid the Syrian civil war, the Syrian military withdrew from the Kurdish regions along the Turkish-Syrian border. In 2012, territory that fell out of the government's control (from al-Qamishli in the east to Afrin in the west) was ultimately left to fend for itself. Kurdish resistance and opposition forces, made up of over 11 different factions, the largest and most prominent of which is the Democratic Union Party (PYD) and its military wing the Kurdistan Workers' Party (PKK), were encouraged to consolidate and reconcile their differences by the Kurdish Regional Government (KRG) of Iraqi Kurdistan, under which a *de facto* autonomy framework could be advanced and organized for the region (Burç, 2020, 326-327 & Lawson, 2013, 469-470). Simply put, these organizations filled a power vacuum left by the withdrawal of the Syrian state from the region and came to power by providing the goods, services, and administrative needs of the region. These organizations were supported by the local population for a slew of reasons including their security apparatus and providing of goods and services, which resulted in the first grass-roots autonomous regions in the country under the Cantons of Rojava in 2014 (Burç, 2020, 326-327). This was also the year an interim constitution, the Social Contract, was drafted and adopted to guide the future of the region (Kivilcim, 2022, 33). These cantons were brought together under the unified federal administration of the Democratic Federation of Northern Syria (DFNS) in 2016. In 2016, during the Rojava Assembly (2016) (also known as the second conference of the Constituent Assembly of Northern Syria) a constituent assembly representing the three self-administered Rojavan cantons formally accepted

the Social Contract as its constitution along with the principles of the political system outlined in the document (Kivilcim, 2022, 34-36). The Assembly also drafted a declaration that the population of northern Syria, including these autonomous regions, would not pursue the formation of a separate state but defend the current pluralist confederal system to maintain its independence and sovereignty (Burç, 2020, 324-327). In 2018, the autonomous regions, formally under the Syrian Democratic Council, would come together under the newly established entity of the Autonomous Administration of North and East Syria (AANES) with territories including the seven regions of Jazeera, Euphrates, Afrin, Manbij, Tabqa, Raqqa, and Deir ez-Zor (Kivilcim, 2022, 33).

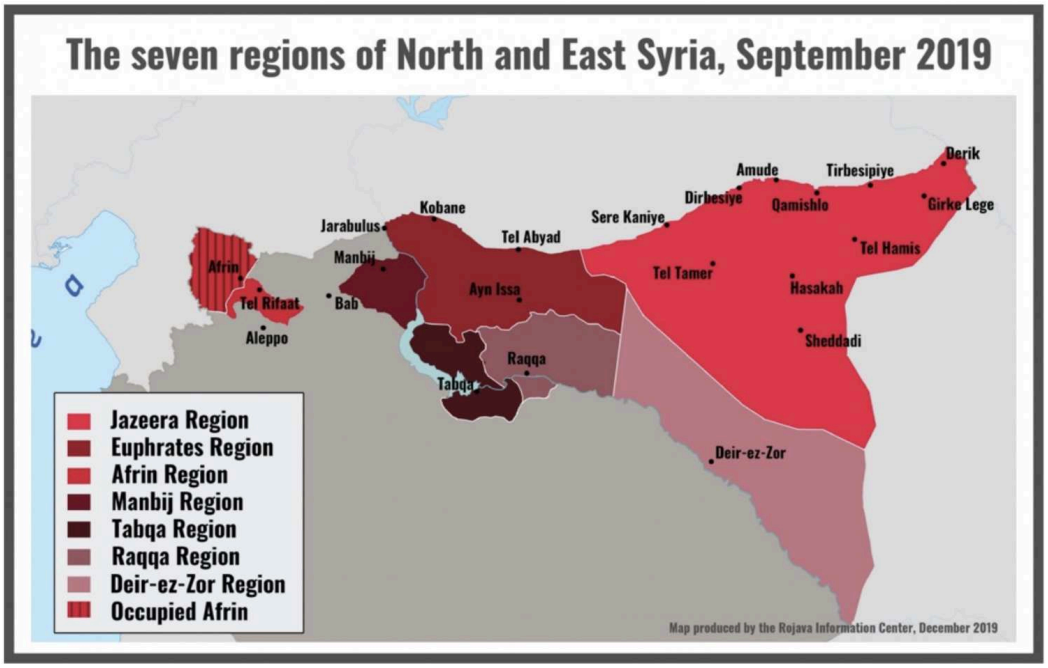

Figure 8. Seven Regions of North and East Syria (Rojava Information Center, 2019)

The population of AANES is difficult to determine due to administration difficulties, ongoing conflict, and the dynamic flow of refugees across the country and neighboring countries' porous borders in the region. Estimations have a population number between four and five

million (Kivilcim, 2022, 33). Refugees and internally displaced people (IDP), driven to the region by civil conflict, conflict in neighboring Iraq in the early 2000s, displaced by the ISIS resurgence in the region, Turkish military offensives on North and East Syria, and the Earthquake along the Syria-Turkish border in 2023, make up a substantial number of the population of AANES. Estimated in the hundreds of thousands, IDPs have settled in IDP camps across the region, including the Al-Hol camp in AANES which hosts more than 70,000 people from 62 different countries (Kivilcim, 2022, 36). The ethnic makeup of the region is very diverse, much more so than the autonomous Iraqi Kurdistan in neighboring Iraq. Kurds and Arabs make up the majority populations of the territories under AANES although there are many other minority groups including Turkmen, Circassians, Armenians, Chechen, Evangelical, Yezidi, and Alevi identities (Rojava Information Center, 2019, 12-13). Within AANES, the ethnic population can vary from village to village, neighborhood to neighborhood, city to city, and region to region. As such, what started as a movement primarily advocating for Kurdish autonomy in Rojava (a designation for Kurdish majority regions), AANES now encompasses an autonomous movement that includes a wide range of ethnicities and their respective territories (Rojava Information Center, 2019, 12-13).

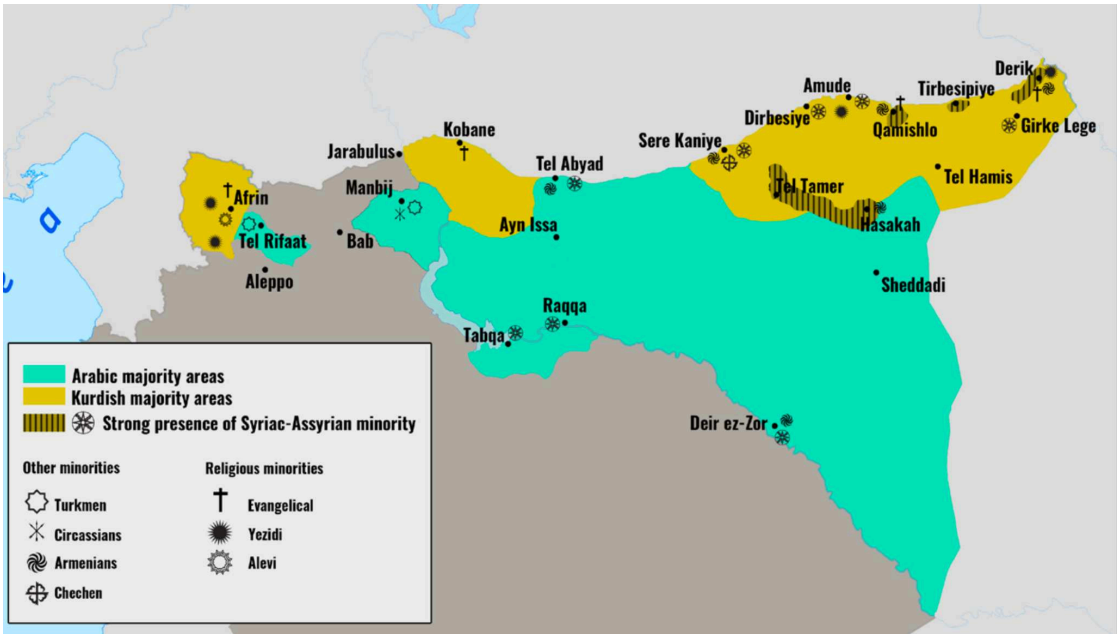

Figure 9. Ethnic Map of AANES (Rojava Information Center, 2019)

The model of autonomy adopted by AANES, a democratic confederal system, is unique to the case of Syria. It challenges the contemporary concept of the state and statehood by suggesting that fully autonomous regions, with independence granted by the larger state apparatus, can exist in a plural power-sharing system, rather than a centralized one. AANES typically avoids conflict with the Syrian state and its relationship with the Assad regime has been described as pragmatic and ambiguous (Kivilcim, 2022, 33-34). Internationally, recognition of AANES as a fully-fledged autonomous region is limited and sporadic, although it has opened up representative offices in some European capitals (Kivilcim, 2022, 33). As far as governance is concerned, AANES adopts a form of democratic confederalism and exists on a model of democratic autonomy which adopts three main dimensions: direct self-government by the communes through local institutions (neighborhood/village/municipal assemblies and councils), equal participation for all religious and ethnic groups in all areas of decision-making, and

strengthening of woman's position in all systems (Kivilcim, 2022, 35). Article 7 of the Social Contract outlines that this democratic federalism is based on organizational groups called *cantons* (communes made up of 30-500 households of a city, village, or countryside) which form the base for a direct democracy style system of independent decision making (Kivilcim, 2022, 35).

The political system itself is composed of three structures: The Movement for Democratic Society (TEV-DEM), AANES (the system of communes and elected councils in the territory), and the Syrian Democratic Council (SDC) (where parties are represented) (Kivilcim, 2022, 34-35). At all municipal, regional, and administrative levels of AANES, there are General Councils, Executive Councils, and Justice Councils which have separate legislative, executive, and judicial functions and contribute to the policy-making and decision-making process for the society (Kivilcim, 2022, 34-35). These councils exist at all levels of AANES except the commune level (because at this level there is direct participation by the population) and are made up of representatives. Communes send their representatives to the neighborhood or village council. The neighborhood or village council then elects representatives to the canton (district) level. The representatives elected to this level (or Peoples' Assembly) represent the populations in their canton during legislative processes and the shaping of general policy during a four-year term. The social contract also lays out requirements that the ethnic groups making up the AANES autonomous region (Kurds, Arabs, Syriacs, Assyrians, Armenians, Turkmen, Circassians, and Chechens) have the right to establish, participate in, democratic self-administrations (Kivilcim, 2022, 35). The first communal elections took place in 2017 for 3,700 communal-level representative positions. Council elections took place at the end of 2017. The final round of elections to fill canton-level positions in the People's Conference and

Democratic People's Conference were scheduled to take shortly after this time but were postponed for an extended period (Kivilcim, 2022, 35-36).

At the end of 2023, AANES released their newest and updated version of the Social Contract (Rojava Information Center, 2023) which effectively outlines changes to the former constitution and goals for the future of the autonomous region and adopts a similar framework and language to that original advanced by the Kurdistan Regional Government (KRG) in Iraq at the founding of autonomous Iraqi Kurdistan. Although created separately from efforts to draft and implement a new constitution for the Democratic Republic of Syria, the document makes frequent reference to the national government, including Article 5 which states "The Democratic Autonomous Administration of North and East Syria is part of the Syrian Democratic Republic," (Rojava Information Center, 2023) indicating a commitment to the unity of Syria and in response to accusations of secession. In the first few weeks of 2024, following the posting of the updated Social Contract, the Syrian Democratic Forces (SDF) initiated the formation of the High Electoral Commission, made up of representatives from the regions seven cantons (al-Jazeera (5), Deir-ez-Zor (3), Al-Raqqa (3), Tabqa (2), Manbijj (3), al-Furat (2), and Afrin (2)), to outline the functions of the commission and electoral law for AANES (The Syrian Observer, 2024). While efforts to enshrine AANES autonomy in the official constitution of the Syrian Democratic Republic are ongoing, previous efforts to consolidate and expand the territory, develop a shared sense of law, order, and political organization across the region, and major efforts to draft and implement a shared constitution under the Social Contract point to a bright future for the Autonomous Administration of North East Syria (AANES) and their bid for outright and recognized autonomy.

The history of Kurdish autonomy in Syria, and efforts to fully legitimize the formation of the Autonomous Administration of North and East Syria (AANES) autonomous region, provides a unique and contemporary example, unique in that it is ongoing, for analyzing the conditions for which the autonomous region could be formed. Moving forward, the following cases of Turkey and Iran present cases where the efforts of the Kurds to obtain similar gains to those in Iraq and Syria are still fiercely contested and the potential of territorial autonomy manifesting is unlikely. Nonetheless, analyzing both established and unestablished attempts in the Kurdish cases provides an avenue for increased comparability and analytical gain.

4.4. Turkey and Northern Kurdistan (Bakur)

The non-autonomous Kurdish region in Turkey, also known as Northern Kurdistan or Bakur, is home to the largest Kurdish population of any other country in the world. In Turkey, Kurds make up a staggering 20% of the total population (Patton, 2013, 492). As will become clear from this case study, the Kurdish region of Bakur in Turkey is non-autonomous. Kurdish political opposition organizations, and efforts to establish autonomous regions, have been frequently and aggressively targeted under the framework of Turkey's counterterrorism and counter-extremism framework. Kurds have faced institutionalized racism, and economic, and political marginalization including the outlawing of the Kurdish language (Rojava Information Center, 2019, 11 & Yildiz, 2005, 13-14). Kurds have also been on the receiving end of a series of violent attacks over the decades, including the 1938 massacre in Dersim which killed over 10,000 people, the burning of thousands of Kurdish villages in the 1990s, the 2011 Roboski airstrike massacre, and the destruction of neighborhoods and killing of civilians in Kurdish opposition stronghold cities of Diyarbakir, Nusaybin, Salopi, and Jazira Botan in 2015 and 2016

(Rojava Information Center, 2019, 11). Over the decades thousands of Kurdish people, some of them elected MPs and mayors, have been arrested and are held in Turkish jails (Rojava Information Center, 2019, 11). Upsurges in Kurdish opposition organizations and social movements, including increased operations and outright insurgency efforts of the Kurdistan Workers' Party (PKK), have instigated even harsher countermeasures from the Turkish State, including counterterrorism operations along the southern border regions bordering Iraq and Syria, sometimes even carrying out operations within the territories of these neighboring states and associated Kurdish autonomous regions (AANES and Iraqi Kurdistan). As will become clear from this case study, It has been and will likely continue to be, that the Kurds in Turkey are unlikely to experience the autonomous frameworks experienced in neighboring Iraq and Syria in the near future.

Figure 10. Kurdish Inhabited Areas (Central Intelligence Agency, 2002)

Turkey has a history of statehood and independence spanning throughout its history. Most simply, Turkey has never truly been colonized and has successfully consolidated its territories and transitioned into the modern state system without direct colonial intervention like other states in the Middle East region, as was shown in the Syria and Iraq cases above. Turkey (and Iran, although discussed elsewhere) made the transition to the modern state system by consolidating its power and territory at the end of WWI and entering into agreements and legal frameworks that established and reinforced its preexisting sovereignty and statehood established under the previous Ottoman System. This dynamic is encompassed in the legal agreements that negotiated the end of the Ottoman Empire, the relinquishing of Ottoman territory to Allied powers, the establishment of Turkish independence, and the overhaul of the Turkish legal system. This process took place in the legal frameworks of the Treaty of Sevres (1920), the Turkish War for Independence (1919-1923), the Treaty of Lausanne (1923), the Founding of the Modern Turkish Republic (1923), and the adoption of a new Turkish Constitution (1924), which led to the abolishing of the Ottoman and sultanate and caliphate and the formation of the new modern Turkish Republic of the contemporary (Crawford, 2006). These consolidation efforts were unique to the Turkish transition to the modern state system. They encompassed efforts initiated by an established Turkish tradition and authority working as its own agent of change. Absent from this transition is an overt process of colonialism or intervention, which Turkey managed to avoid and resist relative to other states in the region. This ultimately led to its formation as a fundamentally different type of state, with different powers, structures, and sovereignty, than those states that were formed as a result of overt and interventionist colonial projects. Likewise, their efforts and success in resisting and countering political and state opposition movements are also much

different than other states, especially in comparison to Iraq and Syria regarding the Kurds and their bids for Kurdish autonomy and the formation of autonomous regions.

Early Kurdish history in Turkey, and Kurdish opposition movements and efforts to establish a framework of autonomy for their communities, can be traced back as early as the formation of the modern Turkish Republic and the Mustafa Kamal Ataturk regime in the 1920s and 30s (Yildiz, 2005, 15). In the early years of the modern Turkish Republic, autonomy for the Kurds and the formation of a Kurdish autonomous region in the southeastern Kurdish majority provinces was seriously considered and even outlined in the 1921 Constitution (Heper, 2007, 118-121). Determining an autonomous framework for the Kurds in Turkey was a major part of the reorganization of the Turkish territory and Ataturk's personal goals. However, in the years following, the vast number of Kurds in Turkey, and the increasing number of provinces where they constituted a majority, made it clear to Ataturk that granting autonomy to these territories (the policy would extend Kurdish territory further north than Erzurum and as far as Harput and Konya) would undermine the cohesion of the nation and would not be feasible moving forward (Heper, 2007, 121).

Figure 11. Provinces of Turkey (World Atlas)

Additionally, increased security issues and revolts in the southeastern provinces, along with a non-cooperative stance adopted by Kurdish leaders regarding the Turkish republic's Western and secular orientation, further changed the narrative surrounding Kurdish autonomy and changes to the Turkish constitution. One of the major backbones of the 1924 Constitution was the defining of the Turkish nation, and Turks, as being both ethnic Turks and non-ethnic Turks including all religious denominations (Heper, 2007, 123-126). The Turkish Republic's policy on minority groups at this time was an uncompromising view of the unity and indivisibility of the Turkish territory and people and the non-acknowledgment of minority groups in the country (Patton, 2013, 494). Built on this framework, Turkey underwent Ataturk's "Turkification" program which was initiated across the country but had major implications for the Southeastern regions. The program aimed at assimilating and eradicating non-Turkish

nationalism and affiliated opposition organizations including civil society programs and non-Turkish cultural traditions. The Kurds, as a major target of this program due to their very large ethnic population in the country and a strong sense of identity and organization nurtured by their extensive time of autonomy under the Ottoman system (Heper, 2007, 141, 148, 158-159), were the recipients of restrictive legislation outlawing their spoken language (Kurdish), traditional clothing and cultural traditions, and in some cases state-sponsored violence (Yildiz, 2005, 15 & Patton, 2013, 494). Kurds responded to the Turkification program with a substantial uprising in 1925 which was brutally suppressed by Turkish forces and martial law was established across the entire Kurdish region, involving the deployment of over 52,000 Turkish military forces personnel into the region. Subsequent uprisings in Ararat (1930) and Dersim (1938) were met with violent repression from the Turkish state who carried out the destruction of villages, forced displacement, and mass killings (Yildiz, 2005, 15-16). The Desrim uprising was triggered by a 1934 law, the Settlement Law (1934), that divided the country into three "zones", and granted the government power to move the populations of one zone to another. Zone 3 (Kurdish majority region) was deemed to require assimilation and large swaths of its Kurdish population were forcibly displaced to other zones where they made up a minority (Yildiz, 2005, 16-17 & Öztan, 2020, 97-101).

Until a multi-party form of democracy was established in 1950, Turkey was ruled by a one-party system that was created by the Ataturk regime (Republican People's Party) and would remain in place after he died in 1938 (Patton, 2013, 475). In the 1950 parliamentary elections, the Democratic Party (DP), a breakaway party of the Republican People's Party, won a parliamentary majority ending one-party rule. The DP held a majority in the parliament until it was determined that the party had developed a series of authoritarian and restrictive policies that warranted

intervention by the Turkish military in 1960 (Patton, 2013, 475). The following year, democratic civilian rule was reestablished under the constitution of the Second Turkish Republic (1961-1980), which was heavily liberal and allowed the expression of diverse ideological and ethnic views and the development of civil society (Patton, 2013, 475-476). During the '60s and '70s, political violence and the rise of far-left and far-right extremist groups created a situation in Turkish politics characterized by violent clashes between social and political groups and authorities, political terrorism and street killings, and economic downturns. In 1980 the military again intervened, carried out a coup, and drafted a new Constitution for the third Turkish Republic (1982-present), walking back the liberal policies of the 1961 Constitution by restricting free expression and association activities (Patton, 2013, 476). The 1983 parliamentary elections put the Motherland Party (ANAP) into power which maintained a majority until the ban on political parties predating 1980 was lifted in the late 80s (Patton, 2013, 476-477). The late '80s and '90s saw a period of coalition government leadership until the Justice and Development Party (AKP) won a landslide majority and formed a single-party government in 2002 which would last until our contemporary.

Likely one of the most important factors underlying Kurdish-Turkish dynamics in the country is the Kurdish opposition movement, led by a host of Kurdish political organizations, social movements, and the armed militia, the Kurdistan Workers' Party (PKK), which has been ongoing since the 1970s (Saadi, 2021, 851 & Patton, 2013, 494). Following the military coup in 1980, martial law was established in the Southeast and the new 1982 Turkish constitution walked back the little progress Kurdish groups made in the 1961 constitution. The new constitution was focused primarily on military control of the country and suppression of opposition groups.

During this time the Kurdish language was again outlawed and the names of settlements, towns, and cities were renamed with non-Kurdish titles (Yildiz, 2005, 16-17). In 1984, largely in response to the military coup and the policies of the 1982 constitution which further marginalized the Kurds, the PKK initiated an armed resistance in Turkey with the intention of creating an independent Marxist-Leninist Kurdish State. The armed resistance resulted in a war between the Turkish state and the PKK which lasted until 1998, shortly after the capture of PKK leader Abdullah Öcalan, when a ceasefire agreement was negotiated (Saadi, 2021, 857-858 & Yildiz, 2005, 18). In 1987, the Turkish Parliament passed State of Emergency Legislation (OHAL) which plunged the southeastern regions into a state of emergency, established a state of emergency administration, appointed a Regional Governor, and founded the Village Guard (a state-sponsored defense force of 65,000 Kurds from villages in the southeast tasked with countering the PKK to show their commitment to the Turkish state) (Yildiz, 2005, 16-17). In1987, under Decree 285 of the OHAL legislation, some 3,500 Kurdish villages across the region were evacuated and their populations (an estimated 3 million displaced) moved to settlements in the West of the country in an effort to break up the PKK organization, its support networks, and to disband the Kurdish majority and dominance in the Bakur region (Yildiz, 2005, 16-17).

Following the ceasefire in 1998, Kurdish opposition movements in the country adjusted their tactics from armed insurgency to self-determination via representative and legal politics, particularly targeting urban spheres and capturing municipal positions, under the Turkish legislative system. The 1999 municipal elections in Turkey resulted in major victories for pro-Kurdish political parties in key municipalities across the Bakur region, notably in the city of Diyarbakir a key strategic position for Kurdish opposition groups in Turkey, which provided a

platform for the Kurdish movement to advance its efforts of establishing a Kurdish democratic autonomous region under the principles of radical democracy (Saadi, 2021, 851-852). In 2002, the OHAL emergency legislation in Bakur was lifted largely as a result of Turkish ambitions to join the EU and the pro-EU reforms that took place across the country to bring democracy and human rights up to European standards outlined in the Copenhagen Criteria (1993) of the European Council (Yildiz, 2005, 18-21). Ultimately, in 2004 it was determined that Turkey met the criteria outlined in the Copenhagen Criteria and began its accession to the EU, despite the ongoing conflict and dynamics in the southeast region and the sidelining of the Kurds (their aspirations for increased economic, political, social, and cultural rights and increased autonomy) in the accession process (Yildiz, 2005, 23-25). The time following Turkey's EU bid saw increased rights and the relaxing of restrictive legislation regarding the Kurds, including in 2009 when PM Recep Tayyip Erdogan announced a "Kurdish Opening" which would facilitate efforts to find a non-military solution to the conflict, an amnesty offer to PKK militants, and cultural and social reforms allowing television broadcasts and special courses to be offered to primary school students in Kurdish (Patton, 2013, 487, 494). These reforms and efforts seemed promising, but when PKK fighters were praised when returning from their stations in Northern Iraq later that year thousands of Kurds, over 8,000 according to some sources (Ozsoy, 2013, 108-109), were arrested, including politicians, mayors, lawyers, journalists, teachers, youth, and activists were arrested (Patton, 2013, 487, 494 & Ozsoy, 2013, 108-109). This widespread operation against the Kurds would last until 2011 when the AKP began coming under scrutiny for their aggressive positioning against the Kurds domestically and from the international community (Ozsoy, 2013, 108-110).

In 2013, negotiations between the Turkish government and the PKK were revived, but ultimately stalled and ended following the 2015 general elections and the historic win by the Kurdish Peoples' Democracy Party (HDP), which received 13% of the votes, ending the Justice and Development Party (AKP)'s majority in the government that it had enjoyed for over a decade (Saadi, 2021, 852). Following the elections, Kurdish politicians, activists, and civil society leaders were aggressively suppressed and many were arrested, including elected representatives and mayors (Saadi, 2021, 852 & Rojava Information Center, 2019, 11). This triggered swaths of Kurdish opposition groups, including youth militants across the municipalities of Bakur, Diyarbakir being one such city, to mobilize in a movement called "self-rule resistance". Militants began building up barricades and quartering off neighborhoods and districts in multiple cities across Bakur, reinforced by violent militia groups engaging in active combat with Turkish security forces, to uphold and defend these self-declared "self-rule zones" (Saadi, 2021, 852). Following a series of combat operations across the Bakur region during the second half of 2015 and the first half of 2016, further elevated by the failed military coup attempt in 2016 to oust the AKP and President Erdogan from power, a massive military takeover of Bakur ensued. Combat operations between Turkish forces and Kurdish militant groups were extensive, resulting in the complete leveling of neighborhoods and districts of these cities and the displacement of thousands of civilians. In Diyarbakir's Sur neighborhood, as one example of many, an estimated 24,000 residents were displaced, more than 2,000 houses and buildings were destroyed or damaged, and many civilians were killed or injured (Saadi, 2021, 850).

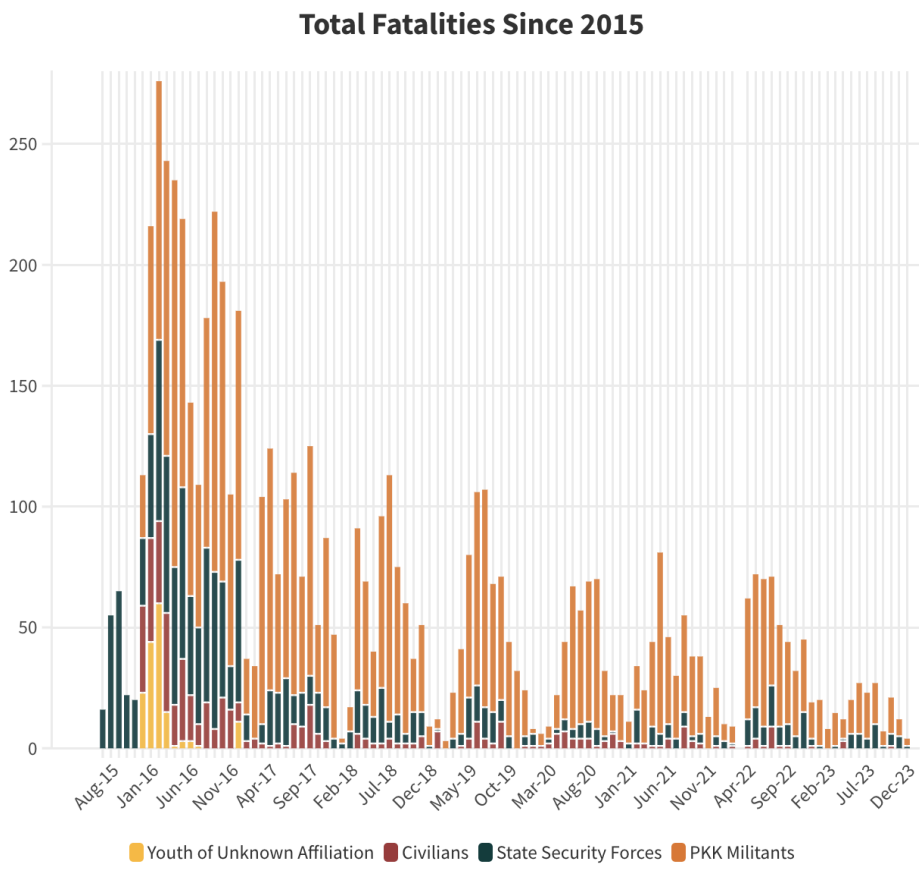

Figure 12. Total Fatalities Since 2015, Turkey-PKK Conflict (Crisis Group)

After months of combat operations, Turkish forces took back control of these self-rule zones. Hundreds of Kurdish politicians, mayors, city council representatives, legislators, parliament members, pro-Kurdish political party members, and civil society leaders were arrested (Saadi, 2021, 852). In total, 83 Kurdish municipalities were occupied by military forces, government-appointed trustees, non-governmental organizations, and economic and social development organizations. Almost all established pro-Kurdish media outlets were shut down. (Saadi, 2021, 852). Military curfew and occupation in these municipalities, particularly in the key strategic and historic Kurdish city of Diyarbakir, remain in place today (Saadi, 2021, 853). In all, 2016 was a year that saw the marginalized position of the Kurds, the effective dismantling of

pro-Kurdish organizations and opposition movements, and the denial of any prospects of Kurdish autonomy or the formation of an autonomous region in Bakur, cemented for the foreseeable future.

Kurdish political and social movements since 2016 have been turbulent at best. Advances in Kurdish civil society and political organization have been increasingly suppressed and contested since the failed coup attempt and subsequent widespread arrests of political dissidents threatening the regime. The autonomous solutions and formation of autonomous regions initiated by the Kurds in neighboring Iraq and Syria can be seen as having raised red flags for the Turkish Republic as far as the possibilities of the Kurds continuing to advance similar agendas in Turkey, a country whose population consists of 20% Kurds and hosts the largest population of Kurds compared to any other country (Patton, 2013, 492). Kurdish bids for self-determination and expansion of civil, political, and social rights are still closely aligned with Turkey's bid for EU membership. Likewise, Kurdish issues remain a sticking point for Turkey's international arrangements and negotiations, particularly regarding its NATO affairs and strategic relationship with the United States. While the conflict itself has seen a downturn in active combat operations inside of Turkey, and a trending reduction in fatalities associated with the conflict (as seen in Figure 2 above), the Kurdish issue, bids for Kurdish autonomy, and Kurdish nationalism remain a palpable force in the contemporary Turkish Republic and Turkish politics.

The history of the Kurds and failed efforts to establish Kurdish autonomy in Turkey provide an example counter to those previously explored in this paper. While Iraq and Syria both have outcomes that could be deemed "established", as far as establishing autonomy and autonomous region is concerned, the Turkish case shows the opposite. As an example of the

characteristics and factors that exist in a case for non-autonomy, this provides a strong case whose contextual elements and underlying factors can be adapted into the analytical framework. While prospects for the Kurds remain uncertain, Turkey's position in the pantheon of contemporary international organizations, many of which represent Western sentiments and commitments to equality, democracy, human rights, and minority rights, leaves room for an optimistic future. This optimism itself is an attribute to the Kurdish experience in Turkey less prevalent in the case of Iran, as will be made apparent below.

4.5. Iran and Eastern Kurdistan (Rojhelat)

The non-autonomous Kurdish region in Iran, also known as Eastern Kurdistan or Rojhelat, is a region of Iran that encompasses a predominantly Kurdish population in the provinces of West Azerbaijan, Kurdistan, and Kermanshah. Rojhelat is a region that Kurds have inhabited for generations and even during the time of the Ottoman Empire, Rojhelat and its Kurdish population have cultivated and maintained substantial and meaningful ties to Greater Kurdistan. What is unique about the Iranian case, compared to neighboring Turkey, Iraq, and Syria, is the relative lack of ethnic politicization and opposition organization mobilization at large (Keshavarzian, 2013, 276). Granted there have been certain movements and events in history that have been impactful to these causes, as will be discussed below, but major gains of minority groups, particularly for the establishment of autonomous regions, have been unsuccessful. Additionally, Iran was never part of the Ottoman Empire and thus has a different main language and religious majority (Shi'ite rather than Sunni Muslim) than its neighboring countries (Keshavarzian, 2013, 253-254). These factors among others make Iran a unique case

within the Greater Kurdistan cases for which comparisons can be drawn, adding another level of depth to the cases adopted in this paper.

Figure 13. Provinces of Iran (World Atlas)

Iran, historically known as Persia, has a history that, like neighboring Turkey, stems far back into history, even as far back as the founding of the Persian Empire in 550 BCE. For the purposes of this paper, the recount of Iran's history and key events about the non-formation of a Kurdish autonomous region will set out at the beginning of the 20th century. The early 1900s in Iran saw a wave of successive Iranian regimes adopting policies seeking to assimilate and suppress diversity. Iran's Constitutional Revolution (1905-1911) saw the declaration of Persian as the official language of all Iranians (Akbarzadeh et al, 2019, 1146) and the wrestling of powers from the newly formed parliament to the monarchy (Qajar dynasty 1794-1925) (Keshavarzian,

2013, 254). In the wake of WWI (1918), the fall of the Ottoman Empire, the establishment of Mandate States, and the formation of the Republic of Turkey in the early 1920s, Reza Shah Pahlavi (1925-1941), a military leader, orchestrator of the military *coup* that ousted the Qajars, and the first of the Pahlavi dynasty (1925-1979). They subsequently implemented a series of "Persianizing" policies that associated Persians and Persian-ness with modernity and progress and non-Persians with backwardness (Akbarzadeh et al, 2019, 1146-1147). Iran under Mohammed Reza (1941-1979) saw the walking back of coercive policies against minority groups, but simultaneously emphasized central control of the state and unified Persian national identity (Akbarzadeh et al, 2019, 1146-1147). Modern-day Iran, or the Islamic Republic of Iran, was founded in 1979 following the events of the Iranian Revolution (1979). The revolution unseated the Pahlavi dynasty (1925-1979) and led to the founding of the Islamic Republic of Iran by Ayatollah Ruhollah Khomeini who would serve as supreme leader of the country until he died in 1989. The Iranian Constitution, adopted following the Revolution in 1979 and amended later in 1989, outlined provisions to safeguard the rights of ethnic minorities, established equal rights for all, and determined that no special rights shall be granted to people based on skin color, race, language, or other diversity factors (Akbarzadeh et al, 2019, 1147). Following the end of the Iran-Iraq War (1980-1988) Iran has increasingly surveilled and monitored minority populations in the country, particularly in the Kurdish majority regions in the West (Akbarzadeh et al, 2019, 1155-1157, Table 3).

Figure 14. Ethnic Map of Iran (Nada & Crahan, 2021)

Kurdish history in Iran showcases the significance of the Kurds and Kurdish bids for autonomy in the country and in neighboring countries. Calls for decentralization and democratization have always been a key point in Kurdish social movements in Iran. One such attempt to establish a Kurdish autonomous region came during the British and Soviet (the Allies of WWII) occupation in Iran in the summer of 1941 (Eshraghi, 1984 and Koohi-Kamali, 2003, 89), where a wave of Kurdish mobilization saw the formation of a series of Kurdish political organizations in opposition to the Persianization policies and even Kurdish and Azeri "autonomous zones" (Keshavarzian, 2013, 278). These opposition and autonomous movements occurred across the cities in the Kurdish majority provinces in the West, particularly in Mahabad

where early meetings to establish a unified and autonomous Iranian Kurdistan took place. As a result of these meetings and the urgent need for the political organization of the region and its peoples, the Committee of the Resurrection of Kurdistan, or the Komalai Zhiani Kurdistan, political organization was established (Koohi-Kamali, 2003, 100). When the time came for radical action, it became clear that the clandestine nature of the Committee would not be sufficient for the tasks ahead and it was replaced by the formation of the Kurdistan Democratic Party of Iran (KDPI) in 1945 (Koohi-Kamali, 2003, 104). In 1946 an autonomous Republic of Kurdistan was established by KDPI leader Qazi Muhammad. The proposed Republic of Kurdistan would have a 13-member parliament based in the city of Mahabad in the east of Iran (Akbarzadeh et al, 2019, 1148 & Koohi-Kamali, 2003, 104). Later that year, when the Soviets withdrew their support, Iranian forces took control of Mahabad and executed Qazi Muhammad and other prominent Kurdish leaders (Akbarzadeh et al, 2019, 1148). The Republic of Kurdistan, or Mahabad Republic as it is sometimes referenced, represented both the long-term ambitions and optimism for a Kurdish autonomous region, and the threat that Kurdish nationalism and social/political movements posed to Iran (Akbarzadeh et al, 2019, 1148).

Kurdish mobilizations in Iran were generally quiet during the time between the Mahabad Republic and the Iranian Revolution in 1979. The uprisings across the country encompassing the Revolution and establishing the modern Islamic Republic (1979) were carried out in parallel with developments in the Kurdish Rojhelat region. While both movements envisioned revolution and the ousting of the Pahlavi dynasty, their vision for the future of Iran diverged on autonomy for the Kurds. In major Kurdish cities in the western provinces, where a power and security vacuum was filled by Kurdish organizations under a *de facto* autonomy framework, the Sunni Kurdish

clergy and political organizations such as the KDPI envisioned full and legitimate autonomy for the Kurds. The KDPI adopted the slogan "autonomy for the Kurdish, democracy for Iran" (Akbarzadeh et al, 2019, 1148). Following the founding of the Islamic Republic of Iran, Kurds sought to organize and capitalize on this transition period and the drafting of the new Constitution, including advocating for a form of Constitutionally recognized autonomy for Rojhelat (Akbarzadeh et al, 2019, 1149). During this time the KDPI and Kurdish militia groups bolstered their capabilities by formally establishing a KDPI headquarters in Mahabad, capturing military outposts and facilities, and bolstering their military equipment stockpiles (Yildiz and Taysi, 2007, 22). The parallel Kurdish uprising in Iran was supported clandestinely by Turkey and Iraq who sought to further destabilize the pre-revolution regime (Yildiz and Taysi, 2007, 63-64). Ayatollah Ruhollah Khomeini's newly formed Islamic Republic fiercely contested these bids for autonomy by accusing them of being attempts at secession from the state, declaring *jihad* against the Kurds for their perceived opposition to the Revolution, banning the KDPI, and violent fighting broke out as revolutionary forces fought to reclaim territories from Kurdish militias across the provinces of Rojhelat (Akbarzadeh et al, 2019, 1149). In the first elections following the Revolution in 1980, Kurdish provinces predominantly voted their Kurdish candidates into parliament but the government voided the vote outright (Akbarzadeh et al, 2019, 1149). During this period, Kurdistan provinces never had a Sunni Kurdish governor, despite their majority in the population (Akbarzadeh et al, 2019, 1150-1151).

The Iran-Iraq War (1980-1988), at least initially, was expected to provide opportunities for Kurds to advance their autonomy agenda. By 1984, it became clear that the war would have a devastating impact on the Kurds and the Kurdish majority region in Iran. Kurds were found on the receiving end of massive offenses and artillery attacks from both sides of the conflict and as a

result, a large population of the region was displaced, including the evacuation of over 70 Kurdish towns and villages and the complete clearing of an over 2,000 square kilometer segment of Iranian Kurdistan (Yildiz and Taysi, 2007, 27). The military wing of the Kurdish Regional Government (KRG) in Iraq, known as the *peshmerga,* continued to advance into Iran and engage in combat operations against the Iranian military. The dire situation in Rojhelat continued to deteriorate when in 1984 the Iraqi military, under the leadership of Saddam Hussein, carried out over 30 chemical weapons attacks (some impacting 20 or more villages in one attack) across the border region targeting military outposts and positions, but also multiple civilian enclaves, almost all of which were predominantly Kurdish (Yildiz and Taysi, 2007, 27). Despite the major setbacks experienced by the Kurds and KDPI during the war, the KDPI, under the leadership of Abdul Rahman Ghassemlou, continued to push negotiations for the formation of an autonomous region with the newly formed Islamic Republic of Iran. The negotiations caused fractionalization within the KDPI organization, culminating in the expulsion of 15 prominent leaders within the organization, weakening the organization and its influence. Kurdish efforts to negotiate an autonomous solution with the Islamic Republic, along with the movement at large, were brought to an abrupt halt with the assassination of Ghassemlou in 1989 along with his replacement Sadeq Sharafkandi in 1992 (Yildiz and Taysi, 2007, 27-28). The devastation of Rojhelat, the Kurdish people, and the destruction of Kurdish political organizations during the years of the War and immediately following resulted in a large downturn of pro-Kurdish movements across the country that would last for years to follow.

Early efforts at establishing regional autonomy primarily originated from the rural and tribal periphery of the country in the Western Kurdish territories that span the neighboring borders of Iraq and Turkey, but in the 1990s Kurdish social movements and revolts found their

way to leftist urban populations (Akbarzadeh et al, 2019, 1151). During the Mohammad Khatami presidency (1997-2005), Kurds, along with other minority groups in Iran, saw an opening in Iranian politics and the relaxing of the state's aggressive posturing towards the Kurdish regions. This included a cultural opening that saw the establishment and growth of non-government organizations and the creation of newspapers, broadcasts, and university language departments in the Kurdish Language. Even during Khatami's campaign for the presidency, the Kurds received special attention and praise for their role in conflicts in the Western regions. Khatami even went on to proclaim that "Kurdistan has been Iran's stability shield against assaults and the Iranian nation owes its existence to this Kurd tribe who stood firm against enemies" (Akbarzadeh et al, 2019, 1150). Khatami also appointed Abdollah Ramezanzadeh, a Shiite Kurd, as the governor of Kurdistan Province, marking the first time that a Kurd has received governorship. Khatami also granted greater autonomy to the Kurdish regions by decentralizing the national government's influence on the regional administrations (Akbarzadeh et al, 2019, 1151). This opening brought about an urbanization of Kurdish issues and manifested in increased participation of the Kurds in urban politics including protests and other activities at Iranian universities across the country.

This political opening was ultimately short-lived as a conservative-led crackdown ensued on Khatami policies in the timespan between 2001 and 2004. Ramezanzadeh was charged with misleading the public, pro-Khatami politicians were rebuffed, reformist politicians and sitting Kurdish members were disendorsed by the Guardian Council in the 2004 parliamentary elections, and political and cultural developments in Kurdish provinces stalled leading to extremely low Kurdish voter turnout in the 2004 parliamentary elections (Akbarzadeh et al, 2019, 1151). During this time the Kurdistan Free Life Party (PJAK), a split-off organization of

the Kurdistan Workers' Party (PKK) in Turkey, was formed. When the Kurds boycotted the 2005 presidential election, Mahmoud Ahmadinejad won the presidency who took no specific stance on the Kurds or Kurdish issues but subsequently reversed many of the political and cultural initiatives started by Khatami in the previous years. Following widespread protests in the Kurdish regions in response to these policies, a military crackdown ensued in the region and several Kurdish civil society organizations, broadcasting stations, and newspapers were closed and several activists were arrested, some of them sentenced to death (Akbarzadeh et al, 2019, 1151-1152). In 2006, the Kurdish United Front and Kurdistan Human Rights Organization were established in response to the deteriorating situation in the Kurdish region, but both organizations stalled out with the death and jailing of their leaders respectively (Akbarzadeh et al, 2019, 1152). In 2008, the PJAK undertook military operations against Iranian military forces prompting an aggressive military response from the Iranian government which suppressed political activities and a wave of Kurdish activist executions in 2009 (Akbarzadeh et al, 2019, 1152).

Tensions between the Kurds and the Iranian government would continue to persist and rise throughout the Ahmadinejad presidency into 2013. In the 2013 presidential elections, Hassan Rouhani was the clear winner and won a large majority of the Kurdish vote. The Rouhani campaign did not offer much to the Kurds specifically but adopted a much more unifying stance on Iranian minority and ethnic groups, including appointing new personnel to manage Iran's ethnic and cultural affairs (Akbarzadeh et al, 2019, 1153). Despite a promising outlook for the Kurds, Rouhani failed to appoint Kurds to impactful positions in the government and rather than adopting a stance of inclusion of minority groups adopted a position that all people are Iranians and that Iran represents all peoples (Akbarzadeh et al, 2019, 1153). Throughout this time, the

PJAK continued to be fiercely countered by the state, and its members were persecuted as "enemies against God (*moharabeh)*" (Akbarzadeh et al, 2019, 1153).

Presently, Kurds in Iran, Kurdish activists, and Kurdish political organizations continue to be contested by the Iranian state. On a single day in 2016, 22 Kurds were executed in the city of Karaj (Akbarzadeh et al, 2019, 1154). In 2017, Bijan Zangeneh, a Kurd, was reappointed to the position of Oil Minister of Iran for another four-year term and has been used as an example asserting that Iran is a multi-ethnic political entity rather than strictly Persian or Arab (Akbarzadeh et al, 2019, 1145-1146). This proved to send enough of an optimistic signal to the Kurds who voted overwhelmingly for the reelection of Rouhani in the 2017 election, although this may have been for lack of a better alternative (Akbarzadeh et al, 2019, 1154). Despite Iran's claims of tolerance, in 2018 Iranian-Kurdish dissidents in Iraq were attacked, the state carried out missile attacks against the KDPI, and the state executed three Kurdish activists (Akbarzadeh et al, 2019, 1153), highlighting the regime's stance on the suppression of ethnic minority groups and continuing to push an agenda of a unified national identity. Likewise, Kurdish participants in Akbarzadeh et al's 2019 study, *The Kurds in Iran: Balancing National and Ethnic Identity in Securitised Environment* (Akbarzadeh et al, 2019), claim their ethnicity has led to fewer opportunities and marginalization, despite the constitutional stipulations regarding equality. The 2019 study highlights how even in the contemporary, struggles for minority rights and furthering bids for Kurdish autonomy are especially difficult and highly contested in Iran.

As is clear from the sections above, Iran's management of ethnic minorities and potential ethnic conflict is a major item in its larger national security agenda. Ethnic disputes in Iran are seen as security threats on multiple levels including political, economic, institutional, and even national and territorial sovereignty and integrity. As such, managing and suppressing ethnic and

minority group mobilization warrants harsh measures to protect Iran's national security likened to those threats emanating from external to the state. As a unique case that simultaneously provides a likened background and context grounded in the Kurdish experience in the Middle East, Iran provides an alternative case for which factors of autonomy may be analyzed in light of overwhelming uncertainty and opposition. With Iran providing a case where the outcome for the establishment of a Kurdish autonomous region is arguably most unlikely, we see that the various cases of Iraq, Syria, Turkey, and Iran cover the range of outcomes possible for analyzing the indicators being investigated.

4.6. Major Takeaways and Overlapping Regional Context

The case studies above highlight both the diversity and likeness of the Kurdish experiences and efforts to bolster and establish territorial autonomy in the Middle East. Some key regional events stand out as impacting all of these cases across the board and warrant a brief recognition. As noted previously, the experiences of WWI and the subsequent reorganization of the countries formed out of the ashes of the Ottoman Empire (1918-1923) had impacts that reverberated across the larger Middle Eastern region. While some states were plunged into persistent violence, civil war, and foreign intervention that would continue to haunt these countries into our contemporary, others successfully consolidated and set out into the new international framework with a position of fierce opposition and suppression of threats to national stability emanating from both inside and outside of the state. The Mahabad Republic (1946), also known as the Republic of Kurdistan, was the first *bonafide* attempt at establishing a fully encompassing Kurdish autonomous region in Iran, but also the Greater Kurdistan territory, represented both the long-term ambitions and optimism for a future of widespread Kurdish

autonomy across Greater Kurdistan like that that was enjoyed under the Ottoman system. Just as this served as a beacon of hope for the Kurds, it also served as a warning and threat that Kurdish nationalism and social/political movements posed to the territorial integrity and internal security of the countries of Iraq, Syria, Turkey, and Iran. The Iraq-Iran War (1980-1989) was a time of great devastation and uncertainty for the Kurds and resulted in millions killed or injured and several million displaced. This time also saw great atrocities carried out against the Kurds, including unfettered artillery shelling, massacres, and poison gas attacks, who were caught in the crosshairs of both Iran and Iraq during the single bloodiest and deadliest conflict in the Middle East's history. The Iraq-Iran war both devastated and galvanized the Kurds and their ambitions for a future of increased political/social/cultural rights and protection, and territorial autonomy. The Gulf War (1990-1991) had a profound impact on the Middle East as a combination of regional and foreign actors plunged these countries into a conflict that would see the turning over of established regimes, shifting regional power dynamics, and seeing political, social, and administrative vacuums being filled by organic and appointed, state and non-state, entities alike. The formation of the Kurdish autonomous region of Iraqi Kurdistan (2003) in Iraq in the wake of the Gulf War sent waves through the territories of Greater Kurdistan and the modern counties they inhabit. Kurds across Greater Kurdistan gained optimism and a palpable manifestation of their autonomous efforts, while modern countries feared that the example set out in Iraq could proliferate across Turkey, Syria, and Iran. The formation of the Autonomous Administration of North and East Syria (AANES) (2018) again sent waves through the region and raised warning flags to Turkey and Iran, who continue to fiercely oppose Kurdish bids for autonomy and carry out frequent trans-border military operations against Kurdish militia groups. In parallel with this renewed hope, the halting of Turkey's EU accession negotiations by the European Parliament

(2019) further complicates and threatens the likelihood of progressive developments for Kurdish autonomy in the country and surrounding country's border regions.

As has been made clear in these cases, the experiences of the Kurds and their bids for greater autonomy and the formation of territorial autonomy frameworks vastly vary between the countries in which these efforts take place. While the Kurdish universe of cases has contexts and history that are shared between them, there is obvious variation in how these countries have interacted with this history and subsequently their interactions with the Kurds. This is exactly why the Kurdish cases in the Middle East provide a level of comparability and variability that makes it especially insightful for gaining analytical insight into the factors underlying the formation and effective exercise of territorial autonomy. The section to come provides a detailed analysis of these cases in the context of the factors outlined in Ghai and Woodman's 2013 study (Ghai and Woodman, 2013). The adapted analytical table will be filled out and the factors scored for the individual country cases in this paper. A brief discussion will ensue, contemplating the impact that the cases adopted in this paper have on the original study and potential avenues for future research.

CHAPTER 5: ANALYSIS, INTERPRETATION, AND DISCUSSION OF THE FINDINGS

The following chapter will apply the framework of Ghai and Woodman (Ghai and Woodman, 2013) to the four cases described above with the goal of explaining the variations among the pair of Kurdish regions: Iranian and Turkish cases on the one hand, and the Iraqi and Syrian cases, on the other. For that purpose, the following pages will present two major analyses: These are 1) the examination of the factors that are favorable to granting of autonomous status, and 2) the examination of the factors that contribute to the effective exercise of autonomy.

By following the conceptual framework of Ghai and Woodman (Ghai and Woodman, 2013), the analysis will also attempt to quantify the values for each variable on a scale of 0 to 5 (negative scores are used in some cases to show factors negative to the outcome). Quantitative scores will help make the comparisons across cases, including the ones outside the Kurdistan cases and quantified by Ghai and Woodman, although the limitations of reducing the complexity of each variable to a single score should be acknowledged. Therefore, quantitative analysis will be complemented with qualitative discussion for each variable.

5.1. Factors Favorable to Granting of Autonomous Status to Autonomous Unit

The following section will interpret the findings under the factors favorable to granting of autonomous status. Each variable will be scored quantitatively for each of the cases in this paper, and the following subsections will expand on the qualitative reasoning for scoring. The interpreted findings will be displayed in the accompanying analytical table (Table 3.1).

Table 3.1. Factors Favorable to Granting of Autonomous Status, at Time of Establishment. Weighting of Conditions at Time of Establishment of Autonomy (0 = None at All; 5 = Absolutely)							
Factors positive to autonomy					Factors negative to autonomy		
Autonomous Unit	Regime Change	International engagement	Small unit, few resources	Tradition of democracy, rule of law*	Autonomy based on ethnicity	Disputed sovereignty	Total (positive factors minus negative factors)
Iraqi Kurdistan (Iraq)	5	4	3	4	-5	-1	10
AANES (Syria)	0	3	1	0	0	-2	2
Rojhelat (Iran)	0	1	2	3	-5	-5	-4
Bakur (Turkey)	0	2	0	4	-5	-5	-4
*Within the state in which autonomy is situated							
Adapted from: Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

5.1.a. A Product of Regime Change

The first variable in the analysis of Yash Ghai's theory (Ghai, 2000) is about regime change. Specifically, the variable aims to measure if there was regime change in the encompassing state at the time of autonomous region formation. This variable in each of the Kurdistan cases proves to be an insightful avenue of analysis correlating with the formation, or non-formation, of the autonomous unit.

In Iraq, regime change came at several points in history. The fall of the Ottoman Empire and the creation of modern Iraq can be interpreted as the first case of regime change in the modern state's history. The *coup d'etat* in 1963 that unseated the Qasim regime which was replaced by the Ba'th party was initially accompanied by negotiations and optimism for the establishment of a Kurdish autonomous region, but ultimately never manifested. It was the fall of the Ba'th party and the Saddam Hussein regime in 2003, the instilling of an Interim Iraqi Government, and the subsequent drafting of the new permanent Iraqi Constitution in 2005, that cemented the formation of a Kurdish autonomous region in Iraq. It is abundantly clear that

regime change was not only present in Iraq at the time of autonomous region formation but that it played a critical role in its establishment. (Score: 5).

Syria's early political history following its independence in 1946 when the League of Nations was disbanded was plagued by successive *coups* and civil war. From 1946-1958, the country saw multiple successive military *coups* which inspired the country to merge with Egypt and become part of the United Arab Republic (UAR). Syria's succession from the UAR in 1961 set the stage for the Syrian Revolution (1963) and the rise of the Ba'th party. For most of the country's independence, and up to our contemporary, the Ba'th party would remain in power under the leadership of the Assad regime; Hafez al-Assad (1971-2000) and his son Bashir al-Assad (2000-present). At the time of the formation of the Autonomous Administration of North and East Syria (AANES), there were no processes of regime change in Syria taking place, although civil war and domestic conflict were present. (Score: 0).

Turkey's history of regime change can begin with the fall of the Ottoman Empire (1919), and the Turkish War for Independence (1919-1923). Arguably, the greatest potential for the establishment of a Kurdish autonomous region in Turkey was during this first change and was outlined in the Treaty of Sevres (1920) and in the first Constitution (1921) which had built-in autonomous arrangements for the Kurds. The founding of the First Turkish Republic (1923-1959) saw the overturning of these arrangements. In 1960, a military *coup* brought about the Second Turkish Republic (1961-1980), a new constitution, but no solid prospects for Kurdish territorial autonomy. In 1980, the military again carried out a *coup* that resulted in the drafting of a new constitution and the formation of the Third Turkish Republic (1982-present). In 2002 the AKP came to power and remained so until our contemporary, despite a military *coup* attempt in 2016 that failed. Had the *coup* succeeded, the 2015 "self-rule resistance" movement across major

cities in the Bakur region could have led to some type of territorial autonomy arrangement for the Kurds, although given the state's history with military *coups* and suppressing Kurdish opposition movements, this seems unlikely. Since the failed *coup*, there has been, if anything, less hope for the prospects of establishing a Kurdish autonomous region in the country. (Score: 0)

In Iran, regime change has come in waves throughout its modern history. The Qajar dynasty (1794-1925) came to an end as a result of a military *coup* orchestrated by Rez Shah Pahlavi who established the Pahlavi dynasty (1925-1979). The Iranian Revolution (1979) saw the ousting of the Pahlavi dynasty, the establishment of the Islamic Republic of Iran (1979-present), and the drafting of a new Constitution. Kurdish political organizations sought to capitalize on the transition period by advocating for a form of Constitutionally recognized autonomy for the Rojhelat while Kurdish militia groups bolstered their military capabilities and positions in the region, which was ultimately crushed by the regime's first leader President Khomeini. The next period of optimism for the Kurds was during the Khatami presidency (1997-2005), but any gains by the Kurds at advancing their bid for territorial autonomy during his time were walked back and subsequently crushed following the PJAK military operations against Iranian military forces in 2008 and would remain in similar standings today. Under the framework of the Islamic Republic of Iran, optimism for the formation of a Kurdish autonomous region in Iran remains slim. (Score: 0)

5.1.b. International Engagement Facilitates Autonomy as an Option

Ghai's theory highlights the important role that international engagements have in the successful formation of autonomous regions. Recognizing the inherent interest that all states

have in maintaining and defending their territorial integrity, international actors can play a critical role in inciting, enabling, or encouraging the formation of autonomous regions.

In Iraq, the role that international engagement has played in the formation of Iraqi Kurdistan is blaring. The Gulf War (1990-1991) and the subsequent U.S. Invasion of Iraq (2003) single-handedly brought about the events that would crush the Iraqi military, remove Saddam Hussein from power, bring about regime change, and install a new system of governance and constitution susceptible to the establishment of Iraqi Kurdistan. Additionally, early international engagement by the U.S. and the United Kingdom in establishing a no-fly zone over Iraqi Kurdistan in 1992 was essential for the withdrawal of Iraqi forces from the region and the safeguarding needed to carry out the first Kurdish democratic parliamentary elections. Furthermore, the Kurdistan Regional Government (KRG)'s key role at the Vienna Conference (1992) paved the way for its eventual granting of autonomy and a newly legitimized role in the future of Iraq and the larger international community. International engagement has played an immensely important role in the successful establishment of Iraqi Kurdistan. (Score: 4).

In Syria, international engagement impacting the formation of AANES is not so clear-cut. AANES was a product primarily of the Syrian civil war that has been ongoing since 2011 which saw the military and administrative withdrawal from the region. The ongoing conflict in the country involving Russian, U.S., and Turkish forces only adds to the slew of conflict dynamics within the country specifically in the northern regions bordering Turkey. The establishment of no-fly zones and de-escalation zones in the region by all parties involved also plays into these regional dynamics. Additionally, although not expanded on extensively in this paper, operations against ISIS by Western forces have also played a part in the region's international engagement. Internationally, recognition of AANES is limited, but representative offices are open in several

major European capitals. Overall, international engagement in the country is present but has not had an undeniable, or smoking-gun, impact on the formation of AANES. (Score: 3).

In Turkey, international engagement has been much more limited than the Syria and Iraq cases. Relative stability across the country, substantial emphasis by the state on national unity and territorial integrity since its founding, and unique position within the international community have made for much less international engagement than the other states in this paper. In regards to Kurdish bids for the establishment of an autonomous region, the clearest example of international engagement is likely tied to Turkey's unique position in the larger international community and membership in multiple international organizations. Particularly, Turkey's bid for EU membership (which has stalled since 2019) has frequently included negotiations and discussions generally benefiting the Kurds. In contrast, Turkey has also used its prominent role and veto power in NATO to solidify its rhetoric on Kurdish issues and advance an agenda of getting Kurdish militia groups in Turkey recognized as international terrorist organizations by the international community. Overall, international engagement concerning the establishment of a Kurdish autonomous region is extremely limited in our contemporary world. (Score: 2).

In Iran, international engagement was most present and impactful for the Kurds before the Iranian Revolution in 1979. Similar to Turkey, national unity and territorial integrity remain a major commitment of Iran's political leadership. Minority and opposition organizations and militias are fiercely suppressed and targeted by the state's counterterrorism and counter-extremism operations. Unlike Turkey, Iran's position in the International community leaves much to be desired for the Kurds and their bids to establish an autonomous region in Rojhelat. Simply put, Iran does not engage in many diplomatic endeavors and international

organizations that encourage a change in position on the Kurds in the country in the way that Turkey might. (Score: 1).

5.1.c. Autonomy is Easier to Grant in Small/Marginal Areas with Few Resources

In Iraq, Iraqi Kurdistan encompasses the three governorates of Erbil, Sulaymaniyah, and Dohuk making up a territory of around 40,000 square kilometers. The population, predominantly Kurds, makes up 10% of the total population of Iraq (5.5 million people). The resources available to Iraqi Kurdistan include prospects in its agricultural, power, fossil fuel, and service industries. The most prominent pool of resources is derived from their oil-rich territory and major oil production hubs like the city of Kirkuk, much of which falls under the umbrella of "disputed territory" between Iraqi Kurdish Forces, Iraqi Government Forces, and pockets of Islamic State Forces. These oil fields, facilities, and regional hubs make up substantial and contested resources in the region and for Iraqi Kurdistan (See Map 5). (Score: 3).

In Syria, the AANES includes the regions of Manbij, Euphrates, Jazeera, Afrin, Deir, Raqqa, and Tabqa. The population of AANES is an estimated 4-5 million making up around 20-25% of the total population of Syria. The territory under AANES control is estimated at 44,000 square kilometers, 25% of the land area of Syria. AANES has a great pool of resources available to it including rich water, agricultural, and oil regions and hydropower and fossil fuel sectors. AANES's large population, territory, and abundant resources make it a formidable force in Syria and far from a small and marginal area. (Score: 1)

In Turkey, compared to the other countries in this paper, the Kurdish Bakur region and population of Kurds make up a substantial area of territory and percent of the population and is the largest population of Kurds living in any country in the world. The population of Kurds in

Turkey is an estimated 15-16 million people, or 18-22% of the total population of the country. The resources that exist in the Bakur region are relatively substantial compared to the other cases given the size of the region, the large population, and its highly developed economic and urban centers. Even as early as the Ataturk regime, the Turkish Republic recognized that the substantial size of the Kurdish population, and the expanse of Kurdish-majority provinces in the country, would pose too much of a threat to national and territorial integrity to consider the possibility of the establishment of an autonomous region for the Kurdish people. (Score: 0).

In Iran, the population of Kurds in the Rojhelat region is a slim portion of the total population, an estimated 8 million people, or 10% of the total population. The provinces encompassing the Kurdish majority population are West Azerbaijan, Kurdistan, and Kermanshah along the periphery of the country. The region hosts a variety of rich resources including minerals, oil reserves, forests, and underground and surface water resources which supply a substantial amount of the country's economic, agricultural, and industrial development. The relative size of the Kurdish population and the Rojhelat region compared to the larger country is small, but the resources that the region provides to the rest of the country are substantial. (Score: 2).

*5.1.d. Traditions of Democracy and the Rule of Law Facilitate Autonomy**

The next factor underlying the successful formation of an autonomous region, according to the theory, is if the state, at the time of granting of autonomy, has established traditions of democracy and the rule of law. This factor provides an array of scores from our cases given their unique backgrounds and history of regime change and civil conflict.

In Iraq, at the time of the establishment of Iraqi Kurdistan, democracy and the rule of law in the country were undergoing major developments. By 2003, and especially during the implementation of the new Iraqi Constitution in 2005, Iraq was well on its way to establishing democracy and the rule of law in the country. Scoring this factor for Iraq is a bit difficult given the circumstances in which democracy, rule of law, and Iraqi Kurdistan formed in the country. Previous to this period, during the rule of Saddam Hussein, democracy and the rule of law were virtually non-existent, along with any potential for Kurdish autonomy. In a sense, democracy, the rule of law, and Iraqi Kurdistan all formed simultaneously and played a crucial part in each other's formation during the early 2000s. The score reflects the critical role and interdependence that existed between these factors and the formation of Iraqi Kurdistan. (Score: 4).

In Syria, at the time of the establishment of AANES, democracy and the rule of law in the country was, and remains, at a major low point, more so than any of the other cases in this paper. The ongoing civil war and authoritarian-like leadership of the Assad regime drastically reduced the rule of law and the presence of democracy in the country. Despite these circumstances, the regions encompassing AANES were able to band together and capitalize on the political, social, and administrative vacuum created by the civil war. Syria is a clear case where democracy and the rule of law were non-existent at the time of the formation of AANES. (Score: 0)

In Turkey, the formation of the Third Turkish Republic in 1982, and the subsequent implementation of the new Constitution, saw the most recent formation of democracy and the rule of the law, although it has been a part of its history since its independence. Even in our contemporary, we see frequent elections and shifting of political dynamics in the country. Even under accusation of authoritarian tendencies in our contemporary regarding the AKP government

under President Erdogan, Turkey's history and tradition of democracy and rule of law is apparent. (Score: 4).

In Iran, although their traditions of elections and mixed-system type of governance resemble the core features of a democratic society, how democracy manifests in the country in regards to the recognition and protection of minority peoples and their rights leaves much to be desired. Regarding the Kurds, frequent denial of political representation and arrest/execution of prominent political and civil society leaders showcase a limited tradition of democracy and the rule of law in the country. However, to put the case into perspective, the Islamic Republic's commitment to the enshrining and proliferation of Islamic Law across the country, and its enforcement, can be interpreted as maintaining a rule of law. Iran is a challenging case regarding this factor given its unique political system and underlying Islamic and theocratic commitments. (Score: 3).

5.1.e. Autonomy is Easier to Grant When it is Not Solely Based on Ethnicity

One factor that is identified as having an impact, both positive and negative, on the successful formation of autonomy is the ethnic makeup of the autonomous unit itself, and whether the underlying motives for establishing autonomy are ethnically driven or involve a single ethnic group. Ethnicity, especially in the Kurdish cases, plays an important role in the formation of autonomous regions and in uniting Kurds across the territories of Greater Kurdistan. As an ethnic group with a substantial presence in the Middle East and across these territories, and shared history under the Ottoman system, the Kurds as an ethnic people and Kurdish identity as a foundation for which organization can form and gain momentum, is a substantial force. In each case except for AANES, we expect to see a similar score.

In Iraq, the establishment of Iraqi Kurdistan was predominantly based on the Kurds, their ethnic identity, cultural history and traditions, and Kurdish political organizations. Even the name of the autonomous unit, Iraqi Kurdistan, stems from the cultural and historical traditions of the Kurds. It is clear that Ethnicity has played a substantial role in the formation of Iraqi Kurdistan. (Score: -5).

In Syria, AANES provides a case of extensive ethnic diversity not present to the same extent in the other cases in this paper. AANES encompasses multiple ethnic, religious, and minority groups and their ambitions for autonomy from the Syrian state (as seen in Map 8.). In AANES, the majority ethnicity is Arab, with the Kurds forming a close second. Other ethnic minorities, such as Syriac-Assyrians, Turkmen, Circassians, Armenians, and Chechens are also present. In fact, one of the stand-out characteristics of AANES is its ethnic and religious diversity and the ability of these groups to organize around a system of autonomy that recognizes and capitalizes on this diversity. (Score: 0)

In Turkey, efforts to establish a Kurdish autonomous region in Bakur have again been predominantly driven by the Kurds. The large population of Kurds in Turkey, coupled with a history of autonomy and substantial Kurdish-driven autonomous movements in neighboring Iraq and Iran, has generated substantial Kurdish nationalism in the Bakur region. While undoubtedly there exists other minority groups within these territories, ongoing bids for autonomy, and historical instances of autonomous movements in the country, have been predominantly driven by the Kurds. (Score: -5).

In Iran, similar to the Iraq and Turkish cases, bids for the establishment of an autonomous region have been predominantly driven by the Kurds. Ongoing efforts to establish an autonomous territory in the country are virtually non-existent. Historical examples of such events in Iran, such

as the Mahabad Republic in 1946, and movements to establish territorial autonomy following the Iranian Revolution (1979) stemmed from and were advocated by Kurdish organizations and the Kurds themselves. (Score: -5).

5.1.f. Autonomy is Easier When Sovereignty is Not Challenged

The sovereignty of the state, and whether or not the formation of an autonomous region threatens this sovereignty, is an essential factor underlying an autonomous unit's successful formation. In Iraqi Kurdistan, the framework of organization established under the 2005 constitution firmly places the autonomous unit within the territory and oversight of the Iraqi state. It clearly outlines how the establishment of the autonomous region is not an attempt at secession from the state and that Iraqi Kurdistan is part of the state of Iraq. Within this framework, the sovereignty of Iraq is not threatened by the establishment of Iraqi Kurdistan. (Score: 0)

In Syria, the formation of AANES is seen by the Syrian state as threatening its sovereignty. However, passages of the Social Contract specifically state that AANES is part of Syria and that the autonomous region has no ambitions to secede from the state. Despite these claims, the Syrian state contests the formation of AANES and does not recognize its autonomy, insisting that the region is still, or should be, part of a unified central system. (Score: -3)

In Turkey and Iran, it is clear that any attempt at establishing an autonomous region would be seen as threatening the sovereignty of the state. In both countries, Kurdish and other minority bids for increased autonomy and the formation of autonomous regions have been violently resisted on the grounds that it threatened national unity and territorial integrity. It is

clear from these cases that Turkey and Iran see their sovereignty threatened by bids for autonomy or autonomous arrangements. (For Turkey and Iran, Score: -5).

5.2 Factors Contributing to the Effective Exercise of Autonomy by Autonomous Unit

The following section will analyze and interpret the findings in relation to the factors contributing to the effective exercise of autonomy by the autonomous unit. Each of the following subsections will provide the qualitative reasoning for the scoring which will be displayed and quantified in the accompanying analytical framework (Table 3.2).

Table 3.2. Factors facilitating exercise of autonomy (0 = Not at All; 5 = Absolutely)

Autonomous Unit	Continuing international involvement	Participatory and democratic negotiations*	Built-in consultation mechanisms	Constitutional entrenchment	Independent dispute resolution	Clear division of powers	Total score: High = 30 Low = 0
Iraqi Kurdistan (Iraq)	3	4	4	5	4	5	25
AANES (Syria)	5	0	0	2	0	2	9
Rojhelat (Iran)	0	0	0	0	0	0	0
Bakur (Turkey)	1	0	0	0	0	0	1
*At the time of the formation of the autonomy							
Adapted from: Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

5.2.a. Continuing International Involvement

Continuing international involvement, according to the 2013 study, is a contributing factor to the effective exercise of autonomy by the autonomous unit. As mentioned earlier in this paper, the states in which these autonomous units exist have an inherent interest in maintaining their national and territorial integrity and frequently view these arrangements as threatening, especially in the cases analyzed in this paper.

In Iraq, continuing international involvement has been essential in upholding not only Iraqi Kurdistan but also the processes leading to the establishment of a permanent government in Iraq in 2006 following years of interim and transitional government rule (which was largely facilitated by international actors). The resurgence of ISIS in the country, and the military capabilities support that the U.S. provides to the country (at request), and to the Kurdish Regional Government and military forces, mean a continued international presence in the country and engagement with Iraqi Kurdistan. (Score: 3).

In Syria, continued international involvement in regard to AANES is tied to the ongoing civil war, the resurgence of ISIS in the country, and foreign state military positions training and equipping/training regional partners (Kurdish/Arab Syrian Democratic Forces (SDF) in particular), in their counterterrorism operations. In our contemporary, according to a 2024 Congressional Research Service report, five countries maintain military positions in the country that carry out active combat operations: Russia, Iran, Turkey, Israel, and the U.S. (Blanchard, 2024). Likened to the case of Iraqi Kurdistan, but further exacerbated by the ongoing civil war and power vacuums across the country, continued international presence in Syria and engagement with AANES and Syrian Democratic Forces (SDF) play into the effective autonomy exercised by the AANES autonomous unit. (Score: 5).

In Turkey, continued international involvement has come primarily in the form of requests and pressure on Turkey from those international organizations in which it holds membership (or is trying to gain). This is a two-way street as Turkey also uses its position in the international community, particularly its veto power in NATO, to push its agenda and position regarding the Kurds. The stalling of Turkey's EU accession negotiations in 2019 has greatly

reduced the continued international involvement in the country regarding Kurdish issues and bids for the formation of an autonomous region. (Score: 1).

In Iran, continued international involvement has been extremely limited. Iran's confrontational position in the International Community, and lack of membership in many of the international organizations that would further empower or negotiate on behalf of the Kurds and other minority groups' rights and bids for increased autonomy and autonomous territories, make continued international involvement in the country almost non-existent. At most, pressure from international actors on security issues could be considered continued international involvement, but this has little if anything to do with the Kurds or the formation of an autonomy framework. (Score: 0).

*5.2.b. Participatory and Democratic Negotiations**

Iraqi Kurdistan again provides an excellent example of participatory and democratic negotiations taking place at the time of the formation of the autonomous region. The Kurdistan Regional Government's key role at the Vienna Conference (1992), its contributions in supporting the interim Iraqi government, and its participation and contributions to the drafting of the new Iraqi constitution show a clear indication of Kurdish inclusion in the negotiations that formed Iraqi Kurdistan. (Score: 4).

AANES in Syria is an interesting case regarding this factor because no actual negotiations took place for the formation of the autonomous region. AANES was established as the result of a "vacuum" created by the civil war and the withdrawal of Syrian forces from the region. Even today, AANES is contested by the Syrian government and not recognized formally by most of the international community. The best way to describe AANES in regards to this

factor is that its autonomy was established under a *de facto* framework rather than as a result of participatory and democratic negotiations, similar to Iraqi Kurdistan before regime change at the end of the Gulf War. (Score: 0).

Both Turkey and Iran have no formally established autonomous regions. Additionally, there are no ongoing negotiations considering such an arrangement for the Kurds. Previous efforts to establish territorial autonomy have either been the result of a *de facto* arrangement (such as the Mahabad Republic in Iran) or have been the result of only short periods of resistance (such as the "self-rule resistance in Turkey). (For Bakur and Rojhelat, Score: 0).

5.2.c. Mechanisms for Consultation and Negotiation Built-In

In Iraq, mechanisms for consultation and negotiation are built into the constitutional arrangements that initially granted the formation of Iraqi Kurdistan. The establishment of a federal parliament system with both regional and national assemblies with equal powers is a major mechanism present in the autonomous framework. (Score: 4).

In Syria, Turkey, and Iran, there are no legal frameworks or agreements outlining any sort of consultation or negotiation mechanisms. The likelihood of this forming in the future for AANES is possible, but for Bakur or Rojhelat very very unlikely in the foreseeable future. (For AANES, Bakur, and Rojhelat, Score: 0).

5.2.d. Constitutional Entrenchment is a Key Guarantee

Iraqi Kurdistan is the only example in our case studies where there are constitutionally entrenched guarantees for its autonomy. Outlined in the constitution adopted in 2005, the autonomy of Iraqi Kurdistan, as well as the mechanisms for its interaction with the Iraqi state and position in the state system, is outlined. (Score: 5).

AANES has a Constitution-like document called the Social Contract. The social contract serves as a guiding document for AANES, as well as a framework that can be integrated into the constitution of the Syrian state if the opportunity arises, similar to how the KRG constitution was used during the reforming of Iraq in the early 2000s. Although this constitution is not recognized by the Syrian state, it is worth noting that great efforts have been made to create the Social Contract and integrate it across the autonomous region, including passages that outline a future arrangement inside of the Syrian system. (Score: 2).

Both Bakur and Rojhelat again have no constitutional entrenchment in the Turkish and Iranian constitutions. As of now, there are no prospects for this to change in the foreseeable future. (For Bakur and Rojhelat, Score: 0).

5.2.e. Independent Dispute Resolution Mechanism is Essential

A mechanism for settling disputes between the autonomous unit and the encompassing state, which is independent of either party and has no inherent interest or bias regarding the settlement outcome, is essential for the effective exercise of autonomy by the autonomous unit.

In Iraqi Kurdistan, an independent dispute resolution mechanism comes in the form of its arrangements under the constitution that outlines the establishment of the judiciary as an independent part of the government. Additionally, the judiciary of Iraqi Kurdistan and Iraq have equal footing in their autonomy arrangement. However, there remains a space for improvement and the establishment of a truly independent dispute resolution mechanism specifically tailored to conflict resolution between the two entities. (Score: 4).

In AANES, Bakur, and Rojhelat because of the state's non-recognition of these claims for autonomy, there exists no independent dispute resolution mechanism. (For AANES, Bakur, and Rojhelat, Score: 0).

5.2.f. Explicit Division of Power Facilitates the Exercise of Autonomy

In the Iraqi Kurdistan/Iraq relationship there exists a clear division of power facilitating the interactions between the two entities. Iraqi Kurdistan and the Iraqi state are both built on a hybrid presidential-parliamentary democratic system of governance with an independent judicial system, president, prime minister, and council of ministers. Within this framework, there is a federal parliament that is composed of both national and regional assemblies that are on equal footing regarding their legislative powers. The explicit division of power is outlined in both the constitutions of Iraq and of Iraqi Kurdistan. (Score: 5).

In AANES, an explicit division of power does not exist in the same context of the Iraqi Kurdistan case. The division of power between AANES and the Syrian state is tentative and although the division of power stands on a *de facto* framework, there appears to be a mutual understanding for the time being of each entity's role and responsibilities regarding their respective territories. The potential for an agreement of some type outlining the explicit division of power between the two entities arising in the future is yet to be seen, but given the gains AANES has made over the years, and the revision of the Social Contract, leaves room for optimism. (Score: 2).

In both Bakur and Rojhelat, there is no autonomous unit for which to analyze. Thus no clear or explicit division of power is recognized between the autonomous unit and the state. Both

Iran and Turkey have shown no interest in facilitating or entertaining a division of power with any entity (For Bakur and Rojhelat, Score: 0).

5.3. Theoretical Implications and Contribution to the Existing Literature

Overall, this study has given valuable insights into possible variables that directly affect the presence or absence of autonomous regions. This section will compare the four Kurdish cases side by side with the cases examined by Ghai and Woodman (2013) to further scrutinize the accuracy of the scores I have given these cases (Table 4.1 and Table 4.2).

Table 4.1. Factors Favourable to Granting of Autonomous Status, at Time of Establishment. Weighting of Conditions at Time of Establishment of Autonomy (0 = None at All; 5 = Absolutely)

	Factors positive to autonomy				Factors negative to autonomy		
Autonomous Unit	Regime Change	International engagement	Small unit, few resources	Tradition of democracy, rule of law*	Autonomy based on ethnicity	Disputed sovereignty	Total (positive factors minus negative factors)
Aland Islands	5	5	4	5	-4	-5	10
AANES (Syria)	0	3	1	0	0	-2	2
Bakur (Turkey)	0	2	0	4	-5	-5	-4
Bosnia-Herzegovina	5	5	3	1	-5	-5	4
Bougainville	4	4	3	4	-1	-4	10
Catalonia	5	0	0	1	0	-5	1
Hong Kong	4	5	3	0	0	-1	11
Iraqi Kurdistan (Iraq)	5	4	3	4	-5	-1	10
Kashmir	5	3	1	1	-4	-5	1
Macau	4	5	3	0	0	0	11
Norfolk Island	0	0	5	5	-1	0	9
Puerto Rico	5	3	3	5	-4	-3	9
Quebec	5	0	0	5	-4	-5	1
Rojhelat (Iran)	0	1	2	3	-5	-5	-4
Scotland	2	0	0	5	0	-1	6
South Tyrol	5	5	4	1	-5	-5	10
Zanzibar	5	0	4	1	-1	0	9

*Within the state in which autonomy is situated

Adapted From: Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.

Table 4.2. Factors Facilitating Exercise of Autonomy (0 = Not at All; 5 = Absolutely)							
Autonomous Unit	Continuing international involvement	Participatory and democratic negotiations*	Built-in consultation mechanisms	Constitutional entrenchment	Independent dispute resolution	Clear division of powers	Total score: High = 30 Low = 0
Aland Islands	2	1	5	5	5	5	23
AANES (Syria)	5	0	0	2	0	2	9
Bakur (Turkey)	1	0	0	0	0	0	1
Bougainville	4	5	4	5	4	4	26
Catalonia	1	4	4	4	4	3	20
Hong Kong	2	1	2	3	1	4	13
Iraqi Kurdistan (Iraq)	3	4	4	5	4	5	25
Kashmir	1	2	2	3	3	2	13
Macau	2	1	2	3	1	3	13
Norfolk Island	1	2	2	0	2	2	9
Puerto Rico	3	1	2	1	1	4	12
Quebec	1	4	5	4	5	4	23
Rojhelat (Iran)	0	0	0	0	0	0	0
Scotland	1	4	4	2	3	4	18
South Tyrol	4	2	3	3	4	4	20
Zanzibar	0	0	1	2	0	1	4
*At the time of the formation of the autonomy							
Adapted From: Ghai, Yash, and Woodman, Sophia. "Practising Self-Government : A Comparative Study of Autonomous Regions". Cambridge: Cambridge University Press, 2013.							

The application of the theoretical framework of Ghai and Woodman (Ghai and Woodman, 2013) to the four Kurdish cases generally confirms the framework. Overall, the findings of this paper, when compared to those of the original study, show trends that we might expect given the outcomes of autonomy encompassed in each of the autonomous units investigated. The first category of factors, factors favorable to the granting of autonomous status, appears to trend how we might expect. For Iraqi Kurdistan (Iraq) and AANES (Syria), we see scores that we might expect from instances where an autonomous unit was successfully established. Especially in the Iraqi Kurdistan case, we would expect to have a higher score than the rest. AANES, as a dynamic

case of autonomy that has mixed acceptance by the state and the international community, we would expect a much lower score just breaching the low scores that would characterize marginal autonomy. For the Bakur (Turkey) and Rojhelat (Iran) cases, where no autonomous region exists, we would expect to see extremely low, even negative, scores indicating a non-autonomy outcome. For the second category of factors, factors facilitating the exercise of autonomy, we also see scoring trends that we might expect. Iraqi Kurdistan shows a high score for this category, expected because of its constitutionally entrenched autonomy, organization and power-sharing mechanisms, and structure within the state. AANES shows a lower score just over the threshold, again expected because of the lack of cooperation and agreement between the autonomous unit and the state on multiple fronts. Both Bakur and Rojhelat are expected to have little to no score on this section due to their lack of established autonomous units and exercise of autonomy within the state. This shows promise for Yash Ghai's theory for the formation of autonomous regions and the effectiveness of the analytical framework adopted by the 2013 study. This is an exciting prospect as the factors outlined in the theory, and the analytical framework adopted in the original study and this paper could serve as a shared framework for which additional cases can be integrated. A shared point of departure is a major step in the continued development of a theory on the formation of autonomous regions.

Having said that however, the findings in this paper also highlight an additional variable that is missing in the framework, namely whether the autonomous unit obtained autonomy initially under a *de facto* understanding. In each of these cases, at one time or another, there existed times of territorial autonomy (although some were short-lived) that were established under a *de facto* framework. *De facto* in this sense refers to the "granting" of autonomous status when a power, political, security, or administrative vacuum forms via the withdrawing or

dissolving of the state from the territory. Those organizations that rise to fill these voids effectively "grant" themselves autonomous status for lack of opposition from the central government or other organizations of less prominence or capabilities. As such I postulate an additional proposition to those outlined in Ghai's theory (Ghai, 2000): At the time of autonomous unit establishment, or immediately prior, was autonomy achieved under a *de facto* framework? Consideration of this additional factor may lead to another avenue for which insights into the nature of autonomous region formation can be found. It is clear from the cases in this paper that autonomy under a *de facto* framework is a major characteristic of autonomous region formation, both in the contemporary and historical instances, in the Kurdish context, and potentially in other cases.

CHAPTER 6: CONCLUSION

This study has led to some key findings regarding the factors and conditions relevant to the establishment, or non-establishment, of autonomous regions. Overall, the findings in this paper generally corroborate Ghai's theory and analytical framework for analyzing the factors underlying the establishment and exercise of autonomy by various autonomous units. As noted above, the total scores received by the Kurdish cases in the factor categories fell within the range expected. Additionally, each case had various manifestations of the dependent variables, the establishment and exercise of autonomy, and their scores reflected this variation. Iraqi Kurdistan, as a firmly established autonomous region, scored relatively high across the framework, as expected. AANES, as a transitional autonomous unit at the early stages of its formation and establishment, scored in the low-medium range expected for a loosely established entity itself. Both Bakur and Rojhelat, as prime examples of non-establishment or exercise of autonomy by the autonomous unit, had very low scores (even negative scores in some instances), expected from cases of this contested nature. In general, the findings seem to support the reasoning and effectiveness of analyzing autonomous region formation in light of Ghai's theory and their analytical framework. One addition to the framework, as noted in the previous section, is the addition of an additional factor underlying the granting of autonomous status: whether or not the autonomous unit gained autonomy previously under a *de facto* arrangement.

As with any study on communities and phenomena in distant lands, there are major limitations to this study. There is much work to be done to truly understand the origins and contributing factors to the formation of autonomous regions. So far this study has only just

grazed the surface of the research possibilities with an analysis of the structural factors that can be assessed and analyzed from a remote location and with conventional academic resources. The lack of fieldwork and real-person contributions in those communities encompassed in this study is a glaring limitation that can hopefully be addressed with future fieldwork and ethnographic research endeavors.

A methodological challenge for any in-country fieldwork components of a future research design will be gaining access to the regions and countries that are less accessible to Americans (along with other academics of various national citizenships), such as Iran and Syria in particular. Likewise, research involving human subjects, such as those methods that involve direct human interaction such as 'official' surveying or interviewing of local community members, would hinge on confirmation from both the researcher's home institution's Institutional Review Board (IRB), along with the host country's equivalent human research regulatory institution. Depending on the country, this could prove to be very difficult given the conflictual nature of Kurdish issues and autonomous regions in these countries and for the larger Middle East region. A future academic and research agenda may contemplate the factors and attributes of a research design that may be included or removed, disclosed or omitted, to an extent to which the research agenda can ethically adopt a covert nature.

With these challenges in mind, future research on the phenomena of autonomous region formation, particularly in the field, is extremely exciting and warranted for the advancement of the theory. Future research endeavors will undoubtedly involve extensive ethnographic fieldwork to explore other avenues of autonomy mentioned earlier in this paper, that is, aspects of non-territorial autonomy such as the cultural, personal, and functional, that further characterize and impact the establishment of autonomous regions and for the exercise of autonomy outside of

a strictly territorial interpretation. Again, the Kurdish context could be an excellent collection of cases for this type of research endeavor.

In conclusion, the findings of this paper, and the corroboration of Ghai's original theory and analytical framework, is an encouraging step in the advancement of a theory exploring the phenomena of autonomous region formation. The cases and methodology in this paper also show promise for the analytical framework and its potential application and usefulness in analyzing additional cases. Continued research of this phenomenon, development of the theory, and tailoring of the analytical framework provide a unique and nuanced approach to the study of autonomous regions and contribute to the field's knowledge of contemporary political phenomena and social movements.

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LIST OF ABBREVIATIONS

AANES - Autonomous Administration of North and East Syria
AKP - Justice and Development Party
ANAP - Motherland Party
DFNS - Democratic Federation of Northern Syria
EU - European Union
DP - Democratic Party (Turkey)
HDP - Peoples' Democratic Party
IDP - Internally Displaced People
IGC - Iraqi Governing Council
INC - Iraqi National Congress
ISIS - Islamic State of Iraq and Syria
KDP - Kurdish Democratic Party
KDPI - Kurdish Democratic Party of Iran
KGR - Kurdish Regional Government
MENA - Middle East and North Africa
NATO - North Atlantic Treaty Organization
OHAL - State of Emergency Legislation
PJAK - Kurdistan Free Life Party
PKK - Kurdish Workers' Party
PUK - Patriotic Union of Kurdistan
PYD - Democratic Union Party
SDC - Syrian Democratic Council
SDF - Syrian Democratic Forces
TEV-DEM - The Movement for Democratic Society
UAR - United Arab Republic
UK- United Kingdom
UN - United Nations
US - United States of America
USSR - Union of Soviet Socialist Republics (Soviet Union)