

# INDIAN FEDERALISM PERSPECTIVES

In this first issue of Indian Federalism Perspectives for 2023, we focus on asymmetric federalism. Most often, the discussion has been in the context of the former state of Jammu and Kashmir. In 2019, parliament revoked these provisions and trifurcated the state into three union territories. Our contributor for this issue, Kham Khan Suan Hausing, presents a framework to show how party-system dynamics, party interests, ideologies, and agendas shape federal dynamics. This framework may help us understand both the half-hearted implementation and the revocation of asymmetric provisions in the case of Jammu and Kashmir.

Hausing first shows that India has used a variety of asymmetric autonomy mechanisms to accommodate territorially concentrated minorities and then presents a typology of such arrangements used in some of the North Eastern states. His distinction between homeland state autonomy, decentralised autonomy and devolutionary autonomy contributes to the comparative study of federations and enriches our understanding of asymmetric federal mechanisms.

Togetherness and peace are not givens in segmented societies but are crafted and are always a work in progress. Constitutional provisions alone do not give us the complete picture and inadequately explain why we have durable peace in some contexts and not others. Hausing attempts to make sense of this difference by going beyond the traditional focus on provisions and brings processes into play. He examines the historical and background conditions and the negotiation action between different parties, which led to the institutionalisation of these mechanisms. This focus on processes not only underscores the role of context but also the dynamic nature of federalism.

The variety of accommodationist arrangements implicitly highlights an issue often neglected in federal studies but is a staple in peace studies literature. In peace studies literature, there have been attempts to distinguish between mechanisms to fulfill societal concerns of holding together and building togetherness and those that meet statist security and development concerns. These are valuable insights for federal studies as the centre in these negotiations has often had to balance these two pressures. Federal scholars may find more purchase explaining the success or failure of arrangements if they were to account for these contrasting pressures.

KK Kailash

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## Asymmetric autonomy and the politics of accommodation in Northeast India\*

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Deeply divided societies around the world have adopted a range of institutional devices to manage territorially mobilised groups. Analytically labelled as 'asymmetric autonomy', they encompass non-territorial and territorial institutional devices ranging from corporal or personal federalism to cantonization, federacy, federalism, consociationalism, and territorial pluralism.

Asymmetric autonomy can be understood largely within two frameworks, namely the integration and accommodation frameworks. The integration framework gives premium to polities which seek to establish homogenous nation-states. This framework is hostile to institutionalising diversity (culture, ethnicity, language, and religion) in the public sphere, as doing so could leverage centrifugal tendencies and secession in the long run. Containment and control of minorities' identity, culture, language and religion are common policy prescriptions. Any challenge to the core, dominant national identity, culture, language and religion often invites integrationist responses ranging from assimilation, ethnic cleansing, genocide, partition and secession.

Unlike the integration framework, the accommodation framework leverages public recognition and accommodation of diversity and heterogeneity as enduring values crucial to 'holding together' deeply divided societies. Under this rubric, the failure of multinational states to recognise and accommodate the self-rule or self-determination claims of territorially concentrated groups is seen to promote centrifugalism and secession in the long run. While the case of Israel is often cited as a classic case of an integrationist attempt to 'contain and control' non-Jewish minorities within a hegemonic Jewish 'ethnic democracy', the diverse institutional arrangements made by Belgium, Canada, India and Spain to recognise and territorially accommodate the self-rule and/or self-determination claims of their territorially nested communities are cited as striking exemplars of the accommodationist cases.

Like other multinational states such as Belgium, Canada, and Spain, India has adopted a range of asymmetric autonomy to integrate and accommodate its dispersed and territorially concentrated minorities. While the provision of protective discrimination is used to protect the interest of, and integrate territorially dispersed minorities, categorised

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in the Indian Constitution as Scheduled Tribes, Scheduled Castes, Other Backward Classes and most recently, the Economically Weaker Section, by way of securing fixed quota in public employment, the institutional devices used to accommodate territorially concentrated groups include Article 370 for the State of Jammu and Kashmir until it was revoked in August 2019, the Fifth Schedule for tribal groups outside Northeast India, the omnibus Article 371 and the Sixth Schedule [which envisions Autonomous District Councils (ADCs)] for distinctive tribal groups in Northeast India. These institutional devices have spawned differential degrees of protection and autonomy for territorially defined groups, which have far-reaching implications for durable peace and stability [2] in the long run.

This project, sponsored by the Indian Council of Social Science Research under its Impactful Policy Research in Social Science (IMPRESS)'s scheme, adopts the accommodation framework to examine the research puzzle of why, how and under what circumstances asymmetric autonomy envisaged under Article 371A, the Sixth Schedule and Article 371C of India's Constitution recognise and accommodate the self-determination claims and/or self-rule demands of territorially mobilised tribal groups in Nagaland, Bodoland (in Assam which encompass the four districts of Baksa, Chirang, Kokrajhar, and Udalguri) and in the Hill Areas of Manipur on the one hand, and foster durable peace and stability on the other hand. For analytical purposes, I construct a typology of autonomy in Northeast India, namely, 'homeland State autonomy' (Nagaland under Article 371A), 'decentralised autonomy' (Bodoland Territorial Council (BTC) under the Sixth Schedule of India's Constitution, including ten other Autonomous District Councils (ADCs) in the States of Assam, Meghalaya, Mizoram and Tripura) and 'devolutionary autonomy' (six district councils in the hill areas of Manipur outside the purview of the Fifth and Sixth Schedule, and five autonomous councils envisioned for the five plain tribes of Assam).

In this project, I have adopted the qualitative

research method and made gainful use of primary and secondary sources available on autonomy and the politics of accommodation in Northeast India. Towards this end, I did a round of field trips each to Assam and Nagaland, respectively, during May 2019 and January 2020, and two field trips to Manipur (May-June 2019 and February-March 2021). My attempt to embark on another round of more extensive field trips was disrupted by Covid19 pandemic. As a result, I have barely succeeded in holding a total of 42 elite interviews: 7, 23 and 12 each in Assam, Manipur and Nagaland, respectively. These elites comprised political leaders, including former Chief Ministers and Governors, cabinet ministers and members of legislative assemblies, civil society and tribal leaders. Although I have been able to briefly visit Assam and Manipur State Assembly libraries during this project, I have yet to be able to visit the Nagaland Assembly library.

I have also filed a total of 58 Right to Information queries to obtain details about the nature of accommodation of various groups in different departments of the governments of the three States. Out of the 25, 17 and 16 departments in Assam, Manipur and Nagaland where I filed these RTI queries, only 10, 3 and 6 departments responded to my RTI queries. The data obtained from these departments across the three States was inadequate and disappointing, yet they shed some useful light on the representation of various groups (ST, SC, OBC, General) in the various categories of positions. Given this limitation, they do not tell us anything about intra-group representation. This is an apparent weakness of this project, which may be overcome in the future if we have a more comprehensive understanding of how the politics of accommodation unravels across the three autonomy models in Northeast India.

I employ four analytical variables to create a typology of asymmetric autonomy in Northeast India. While 'history and nature of conflicts' and 'timing and mode of negotiation' are used as two explanatory variables which undergird the variegated nature and outcomes of autonomy, I employ 'identity-preserving powers' and 'powers, and power sharing' as my two dependent

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variables/properties of autonomy.

I demonstrate that if autonomy stems from conflicts around a longstanding history of and popularly sustained self-determination claims by territorially concentrated tribal groups, the nature and outcome of autonomy timely and bilaterally negotiated as equals before such claims transformed into violent sovereignty demands tends to be more robust in ways which is likely to be more capacious in recognising and accommodating their self-determination claims. While a more robust autonomy is a necessary condition to recognise and accommodate territorially mobilised tribal groups, it may not be sufficient to foster peace and stability unless it is simultaneously capacious of fully negotiating their sovereignty/self-determination claims and ensuring equal and effective political participation by envisioning power sharing within and across tribal groups at the State and sub-State level. Conversely, territorially concentrated tribal groups weaker in their self-determination claims and more amenable to internal self-rule early in their conflict with the Indian State are more likely to end up with a weaker and constrictive autonomy arrangement. In other words, the relative strength of the position/claim on self-determination by tribal groups and the entrenched institutional provision and practice of power sharing within and across tribal groups influences the nature of the autonomy arrangement and its capacity to foster peace and stability.

Seen from this analytical framework, 'homeland State autonomy' encapsulated by Article 371A and 371G, respectively, for Nagaland and Mizoram, can be located on a higher scale of autonomy, followed in descending order by the 'decentralised autonomy' of BTC and ten other ADCs under the Sixth Schedule, and the 'devolutionary autonomy' of Manipur hill areas from 1971-89, and from 2010 to till date, Tripura tribal areas from 1950 to 1985, and the six plain autonomous councils in Assam since 1995. Unlike 'decentralised' and 'devolutionary' autonomy, 'homeland State autonomy', especially under Article 371A in Nagaland, envisions

negotiated and shared sovereignty for State-level majority groups like the Naga in a place they call their homeland. This entails the most robust autonomy on identity-preserving powers on 'land and resources'. Under this rubric, Nagaland remains the only State in India to make inapplicable any law made by the Parliament on matters about, inter alia, land and resources, social and customary laws, criminal procedure and religious matters. Primarily tailored to recognise and accommodate their longstanding and popularly supported self-determination claims, this autonomy trumps the consideration of financial viability. Yet these claims are not without contestations and are marked by a protracted history of what I call 'meta-narrative dissensus', centring around a conflicting understanding of self-determination and its concomitant sovereignty claims. Drawing from Donald Horowitz's idea of 'meta-conflict'[3], which underpins conflicts about the nature of conflicts and models of democracy in Apartheid South Africa, I contend that a two-level 'meta-narrative dissensus' informs the history and nature of the conflict between the Indian State and Naga nationalists. [4]

At the first level of dissensus is the enduring conflicts between the Indian State and the Naga independentists on Naga's self-determination claim to sovereignty. The Indian State claims that as a legitimate inheritor of the British Raj, of which the Naga were a part of, the question of Naga self-determination is a legally untenable position at best and represents a problem of 'law and order' at worst.

This position was contested by the Naga independentists led by Angami Zapu Phizo and his Naga National Council from the 1950s till the 1970s and by both factions of the National Socialist Council of Nagalim (Isak Swu and Thuingaleng Muivah faction and the SS Khaplang faction) since the late 1980s. They contended that the Naga had the right to self-determine their political future given that the Naga hills had never been directly integrated into British India as it remained an 'excluded area'. The distinctive nationality claim that the Naga are racially and religiously different from 'Hindu' India also

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constitutes a powerful discursive source to contest the legitimacy of the Indian state to 'occupy' and integrate the Naga hills. This meta-narrative dissensus foregrounds the contentious interpretation of clause nine of the Nine Point Agreement that the Indian State signed with the NNC in June 1947. While the Indian State maintained that under this clause, the Naga's self-determination right would be foreclosed once the ten-year period of its guardianship was over, the NNC contended that it would revert to the status quo. The logical result is that the Naga would be entitled to the right to self-determine their political future, a stand vehemently denied by the Indian State.

This political conundrum persisted when the two NNC delegates refused to endorse the Gopinath Bordoloi Committee report, which eventually laid the foundation of the Sixth Schedule provision of India's Constitution, as it envisioned only tribal 'self-rule' within the framework of internal self-determination. Indeed, this report represents the consolidation of the Indian State's response to recognise and accommodate 'self-rule' and not full self-determination rights. Unlike Mahatma Gandhi's stated position to recognise and accommodate Naga's right to self-determination, a position he maintained when the NNC delegates met him at his Bhangi colony on 19 July 1947, post-independent leaders including Jawaharlal Nehru, were agreeable only to internal self-determination. This standpoint considered the Naga's demand for self-determination not only 'outlandish' but also economically unviable. Furthermore, a powerful segment of post-independent Indian leaders was increasingly wary of the spread of Chinese communism in India's Northeast frontier if Naga's self-determination was conceded to, a position explicitly stated by Kuladhar Chaliha from Assam when he intervened in the Constituent Assembly debates.

Notwithstanding this and the open threat by Jawaharlal Nehru that he would fully employ the power at his command to 'crush the Naga,' if they persisted with their independence/self-determination demand, the independentist Naga

have hardened their position. The successful holding of a plebiscite in 1951 wherein 99.9 per cent of the Naga reportedly endorsed the declaration of Naga independence of 14 August 1947, and the subsequent declaration of a 'sovereign, socialist' Nagaland in 1953 by Phizo and his NNC brought to fruition Nehru's veiled threat to use the coercive power of the Indian State against them. The invocation of the Assam (Disturbed Areas) Act, 1955 and the Armed Forces (Special Powers) Act, 1958, to browbeat the Naga independence which stemmed from this not only led to the perpetuation of the meta-narrative dissensus but also fostered stalemated conflicts.

The second level of meta-narrative dissensus is marked by a sharp conflict and division within Naga nationalist ranks — 'independentists' and 'accommodationists' — on negotiating and sharing their sovereignty with the Indian State. This conflict and division began when moderate and accommodationist Nagas were weaned away by the Indian State in the latter half of the 1950s to negotiate the terms of their self-determination/sovereignty claims in three successive conventions under the rubric of Naga People's Convention (NPC) during 1957, 1958 and 1959. The Sixteen Point Agreement, bilaterally negotiated between NPC and GoI in July 1960 as equals, which laid the foundation of Article 371A of India's Constitution, is the outcome. This Agreement was, however, seen by independentist Naga as a 'sell out' by 'Indian stooges'.

However, NPC leaders like SC Jamir, who played a pivotal role in drafting this Agreement, made a spirited defence of this Agreement and contended that Article 371A not only constitutes the 'bedrock' of Naga society, it was and is the only realistic institutional pathway to negotiate and share Naga's sovereignty with the Indian State, especially on identity-preserving powers like 'land and resources'. This, and the subsequent accord, namely the Shillong Accord that a segment of NNC bilaterally agreed with the Indian State in 1975 to resolve the Naga political problem within the framework of India's constitution, was rejected by the independentist Naga nationalists. This, in turn, perpetuates the meta-narrative dissensus and

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stalemated conflicts within the Naga nationalist ranks. The fact that the Sixteen Point Agreement and Article 371A were bilaterally negotiated as equals under the shadow of a popular and longstanding conflict around self-determination claims ensured that the Naga have the necessary critical bargaining power to negotiate a relatively more robust autonomy on identity-preserving powers, especially on 'land and resources' when compared with the other two types of autonomy.

Unlike 'homeland State autonomy', 'decentralised autonomy' stems from largely peaceful and limited 'self-rule' demand of various tribal groups who constitute either sub-State level majority or dominant group, but minority at the State-level in the erstwhile Assam. The lack of sustained popular support and the fact that decentralised autonomy is timely negotiated before these 'self-rule' demands made a violent turn under multilevel/multilateral negotiation mode between the federal, State and sub-State level tribal groups ensures that it musters certain measure of bargaining power to negotiate a more constricted autonomy than homeland State autonomy. This explains why decentralised autonomy lacks the plenary power like its homeland State autonomy counterpart to regulate land transfer as it endows ADCs only with the power to control and regulate actual ownership of land and property, social and customary laws, marriage, divorce, etc. Yet decentralised autonomy entails a more expansive autonomy than 'devolutionary autonomy', which is negotiated bilaterally or multilaterally between unequals by involving the federal government (but not always), State and sub-State level tribal groups. The terms of devolutionary autonomy are most often superimposed top-down by the State on sub-State level tribal groups. While the terms of autonomy are entrenched in the federal constitution under homeland State autonomy and decentralised autonomy, they are not constitutionally entrenched in the case of devolutionary autonomy where they largely depend upon the vagaries of statutes and regulations passed by the State (s) concerned.

The Bodoland case is an interesting exception to

the decentralised autonomy model as it witnessed violent and popular mobilisation for statehood in the late 1980s after five decades of largely peaceful mobilisation to protect Bodo script, culture, language and language and developmental needs. Unlike the first generation of the Bodoland movement, frontally led by a motley of social-cultural and literati societies like the Dhubri Bodo Jubak Sanmilani in the late 1920s, the Bodo Sahitya Sabha (BSS) and the All Bodo Students Union (ABSU) in the 1950s and 1960s, the second generation Bodoland movement led by admixture of political and armed groups like ABSU, Bodo People's Action Committee (BPAC), Bodo Security Force [subsequently as National Democratic Front of Bodoland (NDFB)] and Bodo Liberation Tigers since the late 1980s engaged in violent and sustained popular mobilisation. Given that this was directed not only against the Indian State but also spawned ethnic outbidding within various factions of Bodo groups ensured that the multilevel/multilateral negotiation mode set apiece a constricted space for maneuver as the various Bodo groups had to bargain with Assam and the Centre as unequals. Yet unlike 'devolutionary autonomy' in six district councils in the hill areas of Manipur and the five plain tribal councils of Assam, the popular yet limited sovereignty mobilisation by various factions of NDFB enhanced the bargaining ability of Bodo groups. This ensured a more robust outcome of autonomy in Bodoland than their counterparts under devolutionary autonomy. It is a different case that various NDFB factions finally gave up their sovereignty demand and signed an Accord with the Government of India (GoI) and Assam on 27 January 2020. Indeed, it became extremely difficult for the NDFB to sustain a sovereignty demand against mainstream popular support in Bodoland for self-rule within Assam.

In contrast to homeland State autonomy, where land is seen as a powerful source of Naga identity and sovereignty, the land is not central to the self-rule demand of the Bodo and the hill tribal people of Manipur. While land continues to provide an important motif to their political mobilisations, the Bodo and hill tribal people of Manipur give more premium to autonomy and access to power as a

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lever to secure their socio-cultural, educational, development, language and land rights. Homeland State autonomy is more robust when compared with the other two types of autonomy in terms of the actual number of powers constitutionally enshrined. Under this rubric, Nagaland is, like other twenty-six Indian States, endowed with sixty-two broad powers listed in the 'State subjects' under the Seventh Schedule of India's Constitution. These include, among others, public order, police, public health and sanitation, markets, land revenue, agriculture and agricultural tax. [5]

Unlike homeland State autonomy, 'decentralised autonomy' and 'devolutionary autonomy' envisioned Autonomous District Councils (ADCs) as a limited institutional architecture to protect the identity, social and religious practices, and customary laws of territorially concentrated tribal groups that constitute either the dominant or majority groups at the sub-State level but minority at the State and federal levels. These ADCs are also intended to cater to their developmental needs. Again, unlike their 'homeland State autonomy' counterpart, they lack the plenary legislative power to transfer land, a key identity-preserving power. They are also far less powerful both in terms of the number and content of powers devolved. While the aggregate number of subjects/powers devolved to the eleven ADCs under 'decentralised autonomy' is twenty-eight, ranging from eighteen in Khasi, Jaintia and Garo hills to forty-eight in Tripura Tribal Areas, the same add up to thirty across the 'devolutionary autonomy' arrangements, ranging from 26 in the Manipur's hill areas to 34 in Assam's six plain areas. Yet in terms of the content of powers devolved, the BTC ranks highest among the decentralised and devolutionary autonomy types, given that no other ADCs, except BTC, have the power over municipal corporations, college education, and the public works department.

The six District Councils in Manipur's hill areas have largely inconsequential administrative powers as they merely have the power to recommend key matters such as appointments or

the succession of Chiefs, inheritance of property, marriage and divorce and social customs. The State government had never devolved 4 out of 17 subjects envisioned for them according to the 1971 Act, namely: (i) management of forests not being a reserved forest; (ii) public health and sanitation; (iii) initiation, inspection and control of relief works; and (iv) allotment, occupation, or the use or the setting apart of land, other than acquired for any public purpose of land which is a reserved forest. [6] Although a 2008 amendment to the 1971 Act increased the number of subjects to 26, 16 of these are yet to be devolved, making District Councils in Manipur weak. These led a critic to consider that the intent of local autonomy is 'questionable' and 'pitiably touching'. [7] The six Autonomous Councils in Assam are also conspicuous by their lack of identity-preserving powers as their mandate was mainly to secure development and socio-economic, cultural and educational interests of tribal groups. In short, the stark internal variation of powers within and across each autonomy type implies that the rank order of their autonomy may change upon changing political context with important implications on the outcomes of autonomy and on peace and stability.

One common thread which runs through the three types of autonomy in Northeast India is the provision of weak power-sharing within and across tribal groups on the one hand and between the sub-State, State and federal levels on the other hand. Nagaland, the epitome of homeland State autonomy, envisaged limited internal power-sharing by providing a thirty-five-member regional council (RC) for the Tuensang district, home to four of the six (now seven) backward Naga tribes including Chang, Sangtam, Khiamniungan and Yimchunger from 1963-1974. Crafted as an internal asymmetrical arrangement to empower the RC to filter state-wide legislation passed by the Nagaland Assembly and to ensure equitable allocation of money between Tuensang district and the rest of Nagaland, this district was initially represented by six members in the State Assembly, which was increased to twelve in 1969. The dissolution of this RC in 1974 formally ended the intra-State power-sharing arrangement in



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Nagaland. The creation of a separate Department of Under Developed Area (DUDA) in 2003 for the six backward districts which hitherto constituted an integral part of Tuensang district except for Phek, namely Kiphire, Longleng, Mon, Phek, Noklak and Tuensang does not seem to alleviate their backwardness much. The demand for 'frontier Nagaland' by the Eastern Nagaland People's Organisation, which represents these districts in the winter of 2010, to overcome their backwardness was a pointer to this. While these districts are now represented by 20 (33.33 per cent) out of the 60 elected members of the State Assembly, Nagaland is nominally represented at the federal level, respectively, by one member of Parliament each in the Lok Sabha and the Rajya Sabha.

Power-sharing under decentralised autonomy also remains weak. Bodo, the politically dominant group in BTC, captured 35 (87.5 per cent) out of the 40 elected seats, although they account for less than one-third of the population. By earmarking barely five elected seats for the non-Bodo majority groups and six nominated seats for the unrepresented groups, including two for women, BTC opens up sites of contestation and conflicts. The fact that Bodoland is represented by 12 (9.5 per cent) in the 126 Assam Legislative Assembly suggests that their interest can be out-voted easily in a simple plurality system. That Bodoland is represented by a single member in the 545 members of Parliament (Lok Sabha) entails inconsequential power-sharing at the federal level.

The hill areas of Manipur, encompassing six district councils, and the five plain tribal autonomous councils in Assam, which come under devolutionary autonomy, do not fare any better. While Manipur's six district councils barely provide two nominated members each for unrepresented tribes in the 26-member councils, Assam's six plain councils have slightly more seats reserved for the non-dominant tribal groups. The Rabha Autonomous Council is an exemplar because it is more sensitive to local demographic distribution as it earmarks 50 per cent of each of the 30 elected seats for the Rabha and non-Rabha

tribal groups. The Hill Areas Committee (HAC) in Manipur, mandated by Article 371C as an intra-state constitutional asymmetrical arrangement, wields important powers pertaining to the hill areas, like district councils and the development of the hill areas. Yet this power is circumscribed by the antecedent history of conflicts between the various tribal groups — Naga, Kuki, Zomi and Hmar — wherein tribal and party loyalties trump commitment to developing and protecting tribal interest.

In sum, this project has succeeded in drawing a typology of autonomy in Northeast India to help us understand the broad contours of the politics of accommodation. The insights generated and the explanations offered to explain the central research puzzle (of why, how and under what circumstances asymmetric autonomy envisaged under Article 371A, the Sixth Schedule and Article 371C of India's Constitution recognise and accommodate the self-determination claims and/or self-rule demands of territorially mobilised tribal groups in Nagaland, Bodoland and the Hill Areas of Manipur on the one hand, and foster durable peace and stability on the other hand) should be useful to students of Indian politics, policy practitioners, and academics engaged in trying to understand territorial management of conflicts in deeply divided places.

### Notes

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[2] In this project, I use 'peace' not as a static state but in the aspirational sense of 'the absence of violence' as a 'complex and difficult...social goal'—to wit Galtung (1969: 167). 'Stability' is an outcome of a state of relative harmony where in the Huntingtonian (1968: 4-5) sense, there is some semblance of equality of the level of political mobilisation and participation and political institutionalisation. In this sense, autonomy arrangements as forms of political institutionalisation have a causal relationship with peace and stability to the extent that they accommodate territorially mobilised groups and ensure equality of opportunity for participation across and within individuals/groups.

[3] Donald L. Horowitz (1991), *A Democratic South Africa: Constitutional Engineering in Divided Societies*. Berkeley: University of California Press, p.2.

[4] Kham Khan Suan Hausing (2014), 'Asymmetric Federalism and the Question of Democratic Justice in Northeast India', *India Review* 13(2): 87-111.

[5] Government of India (2018), *The Constitution of India (As on 31 July 2018)*. New Delhi: Ministry of Law and Justice, Legislative Department, pp. 198-200.

[6] See Government of Manipur, *Administrative Report, 1975-76*, p.39. The number of subjects allocated to District Councils in Manipur has since increased from 17 to 26.

[7] Rajendra Kshetri (2006), *District Councils in Manipur: Formation and Functioning*. New Delhi: Akansha and Centre for Manipur Studies, Manipur University, Imphal, p.42. This was also the common refrain of over 12 previous members of Manipur South District Councils whom I interviewed over the years.