

Crisis, Opportunities, and Consociational Federalism: Reassessing Lijphart's Work After Half a Century of Consociationalism

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ABSTRACT Half a century ago, Dutch political scientist Arend Lijphart crafted the concept of consociational democracy (or consociationalism). His theory first aimed at *explaining how* divided societies could be politically stable, but was then used as a normative attempt to *propose* an institutional framework for power-sharing arrangements in plural contexts. For Lijphart, this framework is to be used to address the structural “crisis” that is looming in divided societies, a crisis that results from the majority-minority(ies) relationships. The concept of consociationalism, when it is combined or merged with federalism, becomes *consociational federalism*, a model that can serve both as a practical tool and as a normative theory to study and compare divided societies. This is the exercise in which we engaged *in fine*, comparing how Belgium, Switzerland and Canada have developed structures and practices infused with consociational federalism. Our conclusion is that, while they are not necessarily three consociational democracies, these three federations have nevertheless put in place mechanisms for cohesion and collaboration. Thus, consociationalism seems to be a valuable remedy to the crisis of divided societies, a guiding principle in their quest for stability, cohesion and good governance.

KEYWORDS consociationalism; federalism; Lijphart; Belgium; Switzerland; Canada.

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Introduction

In his seminal work of 1977, *Democracy in Plural Societies*, Arend Lijphart wrote that in periods of crisis, the formation of a grand coalition of all political forces represents a useful *remedy* to secure political stability.¹ This grand coalition is the first, and arguably most important pillar of his theory of consociationalism. He corroborates his thesis using the case of the United Kingdom during the Second World War, where a War Cabinet composed of a broad coalition of the Conservative, Labour, and Liberal parties was implemented.² For Lijphart, this serves as an example showing that “even in countries that are neither plural nor consociational, a grand coalition may be installed as a temporary expedient to cope with a grave domestic or foreign crisis.”³

Of course, Lijphart is not the only expert to have put forward such an argument. Even before him, Julius Nyerere suggested that in “Western democracies, it is an accepted practice in times of emergency for opposition parties to sink their differences and join together in forming a national government.”⁴ Amongst other things, this is clearly something the COVID-19 pandemic has very recently demonstrated in many countries – such as Canada, Belgium and Australia –, where political differences were put aside and cooperative schemes were instilled to coordinate the best strategy to fight against the virus.⁵

Coming back to Lijphart’s argument, in plural societies, there is, however, a different kind of “crisis,” one that is latent, ongoing, and structural. In his words, in such a context, “it is the nature of the society that constitutes the ‘crisis’; it is more than a temporary emergency and calls for a longer-term grand coalition.”⁶ While the crisis, in such circumstances, does not result

1. Lijphart, *Democracy in Plural Societies*, 28-29.

2. Ibid. See also Lijphart, *Patterns of Democracy*, 81. The possibility of a bipartisan administration in the United States after Watergate is also an example of that: Dahl, “A Bipartisan Administration”.

3. Lijphart, *Democracy in Plural Societies*, 28.

4. Nyerere, “One-Party Rule”, 199. See also Steiner, “The Principles of Majority and Proportionality”.

5. Paquet & Schertzer, “COVID-19 as a Complex Intergovernmental Problem”; Fenna, “L’ombre paisible du fédéralisme australien”. More generally, see Steytler, *Comparative Federalism and Covid-19*.

6. Lijphart, *Democracy in Plural Societies*, 29.

from what he calls “a temporary emergency,” it is no less serious for that. And the logic supporting Lijphart's argument is simple: in a society that is *not* plural, it is the natural course of action for a governing majority to eventually be replaced by another majority, in the electoral process. That is the basic principle of the Westminster system of *government-versus-opposition*. But in divided societies, a linguistic, ethnic or religious minority group may never – or very rarely – gather enough electoral support to form a governing majority. Hence, the *government-versus-opposition* system would most probably permanently replicate the *majority-versus-minority(ies)* dynamics. This is why it is Lijphart's contention that there is a structural crisis in divided societies, one that results from its demography, its power relations, and that requires attention from policymakers, political elites, and the civil society.

In this paper, we aim to reassess the work of Arend Lijphart on consociationalism, and then to study and compare how three different well-established democratic divided societies used consociational federalism in order to help ease certain tensions inherent to their political fragmentation – *i.e.* their latent, ongoing, and structural crisis. To do so, we will first take a look back at half a century of consociationalism (I). Then, we will define what consociational federalism really is, from a theoretical perspective (II). Finally, we will turn to Belgium, Switzerland and Canada to analyse and compare the consociational “cure” that these divided societies have implemented to tackle their long-lasting “crisis” (III).

1. Half a Century of Consociationalism: Crisis and Opportunities

The concept of consociationalism first emerged half a century ago as an *observation* or a *description*. Indeed, in his 1969 paper “Consociational Democracy,” Arend Lijphart writes that the “political stability of a system can apparently not be predicted solely on the basis of the two variables of political culture and role structure.”⁷ If that were the case, one would expect divided societies like the Netherlands, Switzerland, and Austria to be highly unstable and to exhibit a great degree of immobilism. However, Lijphart contends that this is not the case. He continues: “These deviant cases of fragmented but stable

7. Lijphart, “Consociational Democracy”, 207.

democracies will be called ‘consociational democracies.’”⁸ In such a divided context, Lijphart notes that political elites often “make deliberate efforts to counteract the immobilising and destabilizing effects of cultural fragmentation. As a result of such overarching cooperation at the elite level, a country can [...] achieve a degree of political stability quite out of proportion to its social homogeneity.”⁹

Later on, in 1977, in his book *Democracy in Plural Societies*, Lijphart considerably furthers the theoretical development of “consociationalism”. Still insisting on the role of political elites in divided societies, he then refines his understanding: “In a consociational democracy, the centrifugal tendencies inherent in a plural society are counteracted by the cooperative attitudes and behaviour of the leaders of the different segments of the population,” before adding that elite cooperation “is the primary distinguishing feature of consociational democracy.”¹⁰ In the decades to follow, Lijphart wrote extensively on consociationalism, of which he is often called the “father.”¹¹

Recently, in his short contribution “Consociationalism After Half a Century,” Lijphart wrote: “After that time [50 years] there have – admittedly – been changes in terminology [...]. But the basic characteristics have, I think, only been subject to insignificant change. Basically, my contention was – and still is – that an element of consociation and willingness to compromise with other groups can make democracy work even in divided societies if a number of conditions are met.”¹² Those conditions are the four pillars of consociationalism: a grand coalition government, proportional representation, minority veto and segmental autonomy.¹³

That being the case, even with some sort of stability over the last 50 years, consociational democracy still developed, most notably with regard to its

8. Ibid., 211.

9. Ibid., 211-212.

10. Lijphart, *Democracy in Plural Societies*, 1.

11. See Lijphart, “Consociationalism After Half a Century”, 3, where he generously writes: “As I am often called the ‘father’ of consociational theory, I should emphasise that several other scholars were also working on this subject in the late 1960s”.

12. Ibid., 1.

13. Lijphart, *Democracy in Plural Societies*, 25. See also Lijphart, “South African democracy”, 145-146; Lijphart, “Constitutional Design for Divided Societies”, 97.

normative scope. Quite simply, while a positive theory is an attempt to explain objectively how the world or a particular phenomenon *actually works*, a normative theory offers a vision of how that same world or phenomenon *should work*. In other words, a normative theory “involves evaluations of what ‘should be’ as distinct from descriptions of ‘what is.’”¹⁴

As for consociationalism, we are very often at the intersection of these two categories, even if the normative dimension nowadays tends to be much more important. Indeed, as Rupert Taylor puts it, consociationalism “has evolved in a two-stage process: first as description, then as prescription.”¹⁵ In the same line of thought, Matthijs Bogaards writes that “Consociationalism presents a striking case of description turned into prescription.”¹⁶ In 1969, when the article “Consociational Democracy” was published, there was no doubt that we were seeing a *descriptive theory* whose objective was to explain, through a comparative approach, the factors that would lead to political stability in European countries characterised by religious, linguistic or cultural cleavages. But after that, in some sort of “epistemological shift,”¹⁷ Lijphart “gradually discovered the normative potential of consociationalism, recommending it as the best type of democracy for divided societies.”¹⁸ In fact, in *Democracy in Plural Societies*, on the very first page, he wrote: “Consociational democracy is both an *empirical* and *normative* model.”¹⁹

This versatility and usefulness of consociationalism for the study of divided societies explain its now widespread use in the literature, including in the context of post-conflict societies. Indeed, several authors have devoted particular attention to the study of consociationalism in their work. For example, Soeren Keil and Allison McCulloch²⁰ just recently published a collective book looking into and comparing many cases of consociational democracies in Europe, both at the state and substate level (Netherlands, Belgium, Switzerland

14. Calhoun, *Dictionary of the Social Sciences*, s.v. “Normative theory”.

15. Taylor, “Introduction. The Promise of Consociational Theory”, 2.

16. Bogaards, “The Uneasy Relationship”, 396.

17. Lustick, “Lijphart, Lakatos, and Consociationalism”, 88.

18. Bogaards, “The Uneasy Relationship”, 395.

19. Lijphart, *Democracy in Plural Societies*, 1.

20. Keil & McCulloch, *Power-Sharing in Europe*.

and Austria, but also the Western Balkans, Cyprus, South Tyrol, Northern Ireland and others).

In 2019, the *Swiss Political Science Review* published a special issue entitled *Half A Century of Consociationalism – Cases and Comparisons*, where many of the same societies were also under scrutiny, but adding the less traditional cases of India,²¹ the United States²² and the European Union.²³ Such endeavour demonstrates the relevance of thinking about the resolution of tensions in divided societies through the prism of consociationalism.²⁴ This has been the case especially in post-conflict settings, such as the Western Balkans, Cyprus, Northern Ireland, and Lebanon. However, many authors studying such post-conflict settings have noted the difficulty of trying to apply a model like consociationalism, originally designed for developed liberal and democratic societies, to cases of violently divided developing societies with a very limited democratic experience.²⁵

We should therefore perhaps bear in mind that there is a distinction to be made between cases of liberal and democratic divided societies, on the one hand, and cases of violently divided developing societies (often with limited democratic practices), on the other. If consociationalism can potentially be helpful in both contexts, it might be a case of using different means or an alternative form of implementation. For this reason, in this paper, we will only focus on one category of cases, those of liberal and democratic divided societies.

As such, consociationalism, as a theoretical notion and as a normative model, can take many different forms. Indeed, the model is arguably much more flexible than some believe it to be.²⁶ And that flexibility may be an asset for the management of any “crisis.” In his 1976 essay “Pour une crisologie,” French

21. Adeney & Swenden, “Power-Sharing in the World’s Largest Democracy”.

22. Howe, “The United States as a Plural Society”.

23. Piattoni & Verzichelli, “Revisiting Transnational European Consociationalism”.

24. See also McCulloch, *Power-Sharing and Political Stability in Deeply Divided Societies*; Jakala, Kuzu & Qvortrup, *Consociationalism and Power-Sharing in Europe*.

25. See McGarry, “Why Has Cyprus Been a Consociational Cemetery?”; Baytiyeh, “Lebanon’s Power-Sharing System and the Rise of Sectarianism”; Keil & Bieber, “Power-sharing revisited”; McCulloch & McEvoy, “Understanding Power-Sharing Performance”.

26. Gagnon, *L’âge des incertitudes*, 128.

sociologist Edgar Morin writes that crises are simultaneously “blockages and solutions, negative and positive feedback, antagonisms and solidarities.”²⁷ In other words, crises are experiences that can both harm or propel a society; they may represent both a danger and an opportunity. That being said, Morin is concerned that crises nowadays are only seen as harmful phenomena, ignoring their great potential in terms of innovation, creation and identification of new and fruitful solutions to resolve the circumstances that created them. And yet, the “negative” and “positive” dimensions of the crisis, for Morin, necessarily come together.²⁸

According to that perspective, crises – those that are temporary and those that are permanent – bear within them a great potential for opportunities, for new and flexible solutions to cope with the circumstances that have generated them. These opportunities allow for the establishment of innovative institutional arrangements. Therefore, such social laboratories for “innovation and experimentation”²⁹ can undoubtedly feed on the theoretical lessons of consociationalism, but also of federalism.

2. Combining the Study of Federalism and Consociationalism

Ever since consociationalism appeared in the scientific literature, there have been debates, discussions and disagreements about the links that this theory cultivates with its “sibling,” yet better known theory: federalism.³⁰ While they indeed refer to different notions that should not be mixed up, consociationalism and federalism remain complementary in many regards (2.1). When combined, they become *consociational federalism*, an institutional model that can serve both as a practical tool and as a normative theory to study and compare divided societies (2.2).

27. Morin, “Pour une crisologie”, 160 (our translation).

28. Ibid., 160.

29. Poirier & Gagnon, “Canadian Federalism”, 14.

30. It is worth noting that federalism is not a homogeneous theory, but rather that several currents contribute to its construction and feed its thinkers: see, amongst others, Gagnon et al., *Understanding Federalism and Federation*; Burgess, *In Search of the Federal Spirit*; Erk, *Explaining Federalism*.

2.1. Minding the Gap between Consociationalism and Federalism

According to Belgian political scientist Dave Sinardet, the “exact relationship between consociational democracy and federalism remains an unanswered question.”³¹ While this may be true, it is not because the question has not been studied. Lijphart himself published two major articles on the subject: “Consociation and Federation: Conceptual and Empirical Links” in 1979³² and “Non-Majoritarian Democracy: A Comparison of Federal and Consociational Theories” in 1985.³³ Using these two papers, as well as some of the most recent work on the issue, we will attempt to provide some clarity here. At the end of the day, what we should keep in mind is that there are many similarities between federalism and consociationalism, as well as some fundamental distinctions that make the two theories quite autonomous and independent from one another.

With regard to the similarities, the first obvious element is that both theories aim to allow for a more peaceful and stable cohabitation in societies that are deeply divided and crossed by major cleavages. Thus, they share the ideal of providing “political arrangements in which the tensions between the segments of a plural society can be accommodated within a single sovereign state.”³⁴ Indeed, over time, both models have emerged as institutional “solutions” for achieving some degree of political stability in divided societies. Alain-G. Gagnon,³⁵ Ferran Requejo³⁶ and Lijphart³⁷ himself are all amongst the experts who have expressed that opinion.

Furthermore, both consociationalism and federalism derive their substance from the general principles of self-rule and shared rule.³⁸ Indeed, according to Dave Sinardet, both theories are based on the same logic of combining

31. Sinardet, “Le fédéralisme consociatif belge”, 24 (our translation).

32. Lijphart, “Consociation and Federation”, 499.

33. Lijphart, “Non-Majoritarian Democracy”, 3.

34. Lijphart, “Consociation and Federation”, 499.

35. Gagnon, *L'âge des incertitudes*, 127.

36. Requejo, “Plurinational democracies, federalism and secession”, 70.

37. Lijphart, “Consociation and Federation”, 499.

38. See Mueller, “Self-Rule and Shared Rule”.

these two elements.³⁹ Lijphart is even more explicit when he states that “the first principle [of federalism] is that the component units enjoy a high degree of secure autonomy in organising their internal affairs. The second is that they *all* participate in decision-making at the central level of government. These are the principles of autonomy and power-sharing that are also fundamental features of consociational democracy.”⁴⁰ Also, both theories are simultaneously descriptive and normative models. Thus, consociationalism and federalism clearly share major similarities.

However, these theories remain distinct, and it is important not to mix them up. As Lijphart argues: “I found that, both conceptually and empirically, federalism and consociationalism do not coincide, although they do overlap to a major extent.”⁴¹ Firstly, it is essential to note that federalism can be applied both in a divided society and in a relatively homogeneous or “mono-national” state,⁴² whereas consociationalism is intended to be implemented primarily – if not solely – in a plural context. Since the primary objective of consociationalism is to ease the tensions between the components of a divided society, this theory proposes power-sharing mechanisms according to the divisions of a society, a task that is impossible by nature in a “homogeneous” state where such divisions are non-existent or not recognised. In this regard, consociationalism has a more limited scope than federalism. That being said, consociationalism can be implemented both at the state level (Belgium) and at the substate level (Northern Ireland and South Tyrol), while federalism is almost exclusively applied at the state level.

Another significant difference between federalism and consociationalism highlighted by Lijphart relates to the natural opposites of these two theories. He writes: “The opposite of federalism is unitary government, and the opposite of consociational democracy is majoritarian democracy.”⁴³ This can lead to tensions between the two models and their implementation. Indeed, the particularities of the majoritarian model of democracy – and its

39. Lijphart, *Democracy in Plural Societies*, 25.

40. Lijphart, “Consociation and Federation”, 506.

41. Lijphart, “Non-Majoritarian Democracy”, 3.

42. The examples of the United States, Germany and Australia come to mind: see Seymour, with the collaboration of Gagnon, “Multinational Federalism: Questions and Queries”, 2.

43. Lijphart, “Consociation and Federation”, 500.

flagship model: Westminster parliamentarism – all contradict the pillars of consociationalism. In a majoritarian democracy, majority governments take preference over coalition governments. An electoral system in which the political party with the most votes is over-represented in parliament is also preferred, rather than over-representation of minorities. Instead of giving minority groups a veto, a system of alternating power is preferred. Finally, the centralisation of power takes preference over the autonomy of the various segments of the population.⁴⁴

But if the majoritarian model of democracy is the opposite of consociational democracy, unitary government is the opposite of federalism. And we can observe federal states with a majoritarian model of democracy (the United States) and unitary states with such majoritarian model of democracy (the United Kingdom), as we can also observe consociational democracy in action in both unitary (Northern Ireland) and federal (Belgium) systems.

This is precisely where potential tensions between the two theories may arise. Indeed, in a divided society such as Canada, with a federal system and a parliamentarian model in line with majoritarian democracy – and, therefore, in contradiction with consociationalism –, the premises of federalism and consociationalism do collide. The tension is particularly acute in the relationships between the federal government (along with the English-speaking provinces) and Quebec. Here, federalism does not always appear as a model to accommodate linguistic, cultural, and national cleavages, but rather as a way to govern a country as large as Canada.⁴⁵ However, the majoritarian model of parliamentary democracy in the federal and provincial *parliaments* in Canada leads to many intergovernmental relations and an enhanced cooperation between the federal and provincial *governments*,⁴⁶ which *in fine* reproduces a form of grand coalition promoted by consociationalism. This is just one example of the interactions – and, sometimes, tensions – between federalism and consociationalism that can be observed in divided societies.

44. Lijphart, *Patterns of Democracy*, 9-20.

45. See Gagnon, *The Case for Multinational Federalism*.

46. Adam et al., “Intergovernmental Relations in Canada”.

A similar, but opposite, tension between federalism and consociationalism also exists in Belgium. The federal institutions (the Government, the Parliament, the Constitutional Court, etc.) in Belgium are structured to represent the interests of the two main groups of Belgian society. While this occurs in a way that reproduces the main pillars of *consociationalism*, these institutions are nevertheless often described as being truly *federal*. There is therefore some sort of confusion between consociationalism and federalism in Belgium,⁴⁷ which can lead to misunderstandings and tensions between the regions, communities and the federal government.⁴⁸

Therefore, although they share many similarities, federalism and consociationalism ultimately remain two distinct and differentiated theories. That being said, it is nevertheless possible to combine these two models to create a new one: consociational federalism. Indeed, there are many variations of federalism that are studied and used in the literature and in practice. Multinational federalism,⁴⁹ asymmetrical federalism,⁵⁰ treaty federalism,⁵¹ cooperative federalism⁵² or executive federalism⁵³ are but a few examples of specific variations of the federal idea, which all possess their own characteristics and specificities. Both multinational federalism and asymmetrical federalism provide for specific arrangements for some groups, while treaty federalism aims to promote indigenous self-government. Meanwhile, executive federalism encourages political negotiations between different governments, as does cooperative federalism. As such, consociational federalism may be understood as an additional expression of the federal principle, one that first and foremost intends to stimulate and seek consensus within a divided society. And, in order to do so, consociational federalism uses the normative principles put forward by both federalism and consociationalism.

47. See Sinardet, "Le fédéralisme consociatif belge".

48. See Romainville & Reybrouck, "Le débat sur la hiérarchie fédérale en Belgique".

49. See Gagnon, *The Case for Multinational Federalism*.

50. See Popelier & Sahadzic, *Constitutional Asymmetry in Multinational Federalism*.

51. See Papillon, "The Two Faces of Treaty Federalism".

52. See Gaudreault-Desbiens & Poirier, "From Dualism to Cooperative Federalism and Back?".

53. See Watts, *Executive Federalism*.

2.2. Bridging the Gap: Consociational Federalism as both a Practical Tool and an Ideal

In the simplest way possible, Lijphart writes that “under certain conditions, a federation can be a consociation and vice versa.”⁵⁴ It is unclear here whether he distinguishes between *consociational federations* and *federal consociations*, or, in other words, whether he draws a distinction based on the *predominant* characteristic of a political system. For instance, a society could primarily be a federation, but have consociational features –*i.e.* a consociational federation–, or it could, first and foremost, be a consociation, but with a federal organisation –*i.e.* a federal consociation. The distinction between those two certainly appears relevant to us, as it would help better define the very core of a country’s political structure and organisation, but also possibly its historical path.

However, what seems clear for Lijphart is that: “if we add a few characteristics to the concept of federalism, we arrive at the concept of consociationalism.”⁵⁵ Nevertheless, following the saying that *the whole is more than the sum of its parts*, combining the two theories requires more than a simple addition, and consociational federalism has its own specific characteristics. Here again, Lijphart’s perspective is of great relevance. Indeed, he listed the following six features of a consociational federal democracy:

- 1) It must be democratic.
- 2) It has to be implemented in a divided society.
- 3) It ought to respect the four pillars of consociationalism.
- 4) It requires a highly decentralised political system.
- 5) It should arrange for the boundaries of the federated entities to coincide as much as possible with the cleavages of the society.
- 6) It should opt for a large number of federated entities, which should be small in size.⁵⁶

54. Lijphart, “Consociation and Federation”, 500.

55. Lijphart, “Non-Majoritarian Democracy”, 3.

56. *Ibid.*, 5.

To this, we find it necessary to add an extra characteristic: (7) consociational federalism requires some degree of institutional asymmetry. As such, it echoes Lijphart's own observation, as he noted that: "a federation can be regarded as a consociation only if it belongs to the *asymmetrical* category" of federal systems.⁵⁷ Asymmetrical arrangements undoubtedly constitute a mechanism with the potential to ease tensions between the various linguistic, ethnic or religious groups of a divided society.⁵⁸

Indeed, in the case of a society with a majoritarian group and one or multiple minority groups, an equal treatment for all –rooted in what Ferran Requejo and others would call Liberalism 1⁵⁹– is not the best way to structure the institutional architecture of the country, as it would lead to power relations dominated by the majority. In other words, Liberalism 1 "favours the majority national groups"⁶⁰ in divided societies. For that reason, asymmetrical arrangements that offer certain opportunities (such as more competencies) or powers (such as a veto) to minority groups can rebalance power relations and thus help achieve the ideals of consociational federalism.⁶¹ In this respect, asymmetry should be understood as an additional underlying characteristic of the consociational articulation of the federal principle.

Lijphart's clarification regarding the necessary conditions for a federation to be consociational is instructive as it helps define exactly what consociational federalism is. First, the "father" of consociationalism starts from the premise that the state is formally federal. Federalism is the starting point, the *sine qua non* condition for the very existence of consociational federalism. While this

57. Lijphart, "Consociation and Federation", 500.

58. See Popelier & Sahadzic, *Constitutional Asymmetry in Multinational Federalism*; Sahadzic, *Asymmetry, Multinationalism and Constitutional Law*.

59. Basically, Liberalism 1 suggests that equality, in a democratic country, should mean homogeneity of treatment for all; it is essentially based "on individual rights of a 'universal' kind, on a 'non-discriminatory' idea of equality for all citizens, and on a series of procedural mechanisms that regulate institutional principles and the collective processes of decision making": Requejo, "Federalism and National Groups", 42. See also Requejo, *Fédéralisme multinational et pluralisme des valeurs*; Requejo & Sanjaume, "Recognition and Political Accommodation", 107.

60. Requejo & Sanjaume, "Recognition and Political Accommodation", 108.

61. In that sense, asymmetrical arrangements are rooted in what Requejo calls Liberalism 2: Requejo, "Federalism and National Groups", 42; Requejo & Sanjaume, "Recognition and Political Accommodation", 109.

makes sense, the corollary of this premise is that the basic characteristics of federalism⁶² ought to be in place in the state.

Secondly, consociational federalism not only juxtaposes the necessary conditions for the existence of federalism and consociationalism, but also requires specific features. While some may appear self-evident (being democratic and being implemented in a divided society), others are more associated with the objective of achieving the most effective combination of the two theories (being highly decentralised, having the boundaries of the federated entities coincide with the cleavages of society, opting for a large number of federated entities, which should be small in size). As we will see below, some of these specific features of consociational federalism will be challenged by the cases of Belgium, Switzerland, and even Canada.

But more than just *conditions of existence* or *operational modalities* that give shape to consociational federalism, this variation of the federal principle is based on fundamental principles, ideals and objectives. At the very core of consociational federalism lies the normative aim of (a) accommodating different groups coexisting within the same sovereign state or autonomous region, (b) putting in place institutions where they can all influence the political and constitutional debate, (c) allowing them to administer autonomously the matters that only affect them, and (d) creating a sense of loyalty between all. In a country divided into different linguistic, ethnic or religious groups, if and when those features – accommodation, common institutions, autonomy and loyalty – are lacking, political stability, economic prosperity and the very survival of the state may be at risk.

3. Belgium, Switzerland and Canada: Three Different Responses to a Common “Crisis”

Belgium, Switzerland and Canada are all typical divided societies. In fact, Lijphart himself went as far as to write: “There are several Western countries with small linguistic minorities, but only three that can be said to be

62. Such as at least two orders of government, separate jurisdictions, a neutral arbitrator to rule on conflicts of jurisdictions, shared institutions, etc.

linguistically divided: Belgium, Canada, and Switzerland.”⁶³ When looking at the experience of each of these countries, one may notice indeed that the flexibility of consociationalism and the opportunities provided by their latent and ongoing crisis – their divided nature – has led to different institutional responses. While Belgium and Switzerland are more clearly associated with consociationalism – or, at least, with consensualism –, and Canada with majoritarian democracy, all three have nonetheless put in place mechanisms related to consociational federalism. With its “bipolar federalism,” Belgium reveals the closest illustration of a typical consociational democracy (3.1). Switzerland, meanwhile, has its own “concordance” system, one that mixes consociational principles with direct democracy (3.2). Finally, Canada has more of a territorial form of federalism, yet it has developed tools for cooperation that have introduced consociational features (3.3). We will now look into these three different trajectories. This will also allow us to evaluate the extent to which Lijphart’s conditions for a society to be a consociational federal democracy are met in practice, and to look into his contention that “a federation can be a consociation and vice versa.”⁶⁴

3.1. *Consociationalism in the (Bipolar) Belgian Federalism*

Belgian federalism is... complex, to say the least. But we found it is easier to understand if you bear one thing in mind: ultimately, it always comes down to two dominant communities – the Flemish and the Francophones –, to agreements between the two, and to a bipolar structure. To put it in the colourful words of Marc Uyttendaele, Belgium is “a country of surrealism, where it is impossible to unambiguously count the number of federated entities. There may be three regions, three communities, community commissions, but the institutional debate is always resolved within the limits of a ring in which there can only be two protagonists: one is Francophone and the other is Flemish. The institutional debate is always resolved in a confrontation between these two communities.”⁶⁵ Such a sociopolitical context probably made both

63. Lijphart, “Religious vs. Linguistic vs. Class Voting”, 442.

64. Lijphart, “Consociation and Federation”, 500.

65. Uyttendaele, “La procédure de révision constitutionnelle dans l’État fédéral belge”, 138-139 (our translation).

consociationalism and federalism natural paths to follow in Belgium,⁶⁶ with the result that the country can now be regarded as the most convincing case of consociational federalism.⁶⁷ Indeed, the “consociational form of the federal government has been a contributory force to Belgian federalism. Belgian constitutional law contains numerous provisions requiring consultation, cooperation, participation, and negotiation between different segments of the state.”⁶⁸

While it is doubtful that the Belgian Senate really works as a proper consociational institution,⁶⁹ we can point out at least four mechanisms that actually perform that task. First, there is the parity of Flemish and Francophones in the Council of ministers,⁷⁰ where all decisions have to be taken by consensus.⁷¹ This is a major component of consociational federalism, as Lijphart himself emphasised that “[p]arity is an especially useful alternative to proportionality when a plural society is divided into two segments of unequal size.”⁷² In this context where consensus is required, it suffices for the majority of ministers coming from the same linguistic group to refuse to support a decision in order to prevent it from producing any effect.⁷³

Secondly, and just as important as parity in the Council of ministers, there is the existence of two linguistic groups in both chambers of the federal parliament.⁷⁴ Indeed, it is constitutionally required that all parliamentarians – with the exception of one senator for the German-speaking Community⁷⁵ – affiliate themselves with the French- or Dutch-speaking linguistic group.⁷⁶

66. See Mathieu & Guénette, “De la mobilisation du consociationalisme par le droit”.

67. Lijphart, “The Belgian Example of Cultural Coexistence in Comparative Perspective”, 1.

68. Romainville, “Dynamics of Belgian Plurinational Federalism”, 225.

69. See Verdussen, “La dernière réforme du Sénat de Belgique”, 74; Romainville, “Dynamics of Belgian Plurinational Federalism”, 244.

70. Belgian Constitution, art. 99; Romainville, “Dynamics of Belgian Plurinational Federalism”, 233; Sinardet, “Le fédéralisme consociatif belge”, 31.

71. See Reuchamps, “La parité linguistique au sein du conseil des ministres”, 602.

72. Lijphart, *Democracy in Plural Societies*, 41.

73. Uyttendaele, *Trente leçons de droit constitutionnel*, 394.

74. Romainville, “Dynamics of Belgian Plurinational Federalism”, 233; Sinardet, “Le fédéralisme consociatif belge”, 28-29.

75. Belgian Constitution, art. 67 (5).

76. *Ibid.*, art. 43.

Consistent with this idea, political parties in Belgium are divided along linguistic lines. There are the Flemish parties and the Francophone parties.⁷⁷ This feature becomes all the more important when special laws are adopted or modified, which is necessary for many matters related to federalism and institutions. Indeed, because those laws and their amendments must be approved by a majority *in both linguistic groups* – as well as an overall 2/3 majority –, it represents a fundamental consociational mechanism in Belgium.⁷⁸

There are two other devices that are firmly rooted in a consociational logic: the “alarm bell”⁷⁹ and the “conflict of interest”⁸⁰ procedures. The first one suspends the legislative process and transfers decision-making authority to the Cabinet whenever a qualified majority (3/4) of a linguistic group in the federal parliament believes that its rights could be infringed by a given measure.⁸¹ The second one is very similar, but its primary purpose is to allow an order of government (the federal parliament, a region or a community) to intervene whenever it considers its interests might be harmed by another order of government.⁸²

In conjunction, these mechanisms undoubtedly make the Belgian constitutional system a mature model of consociational democracy, so much so that federalism and consociationalism in Belgium are often seen as going hand in hand, as an indivisible whole. This is obviously accentuated by the power relations between the two dominant communities, and the bipolar system they have set up.

However, when we look at Lijphart's conditions for a society to be a consociational federation, we find that not all criteria are met. Belgium is undoubtedly (1) a democratic and (2) divided society where (3) the four pillars of consociationalism are implemented, but one could argue that, while the

77. Romainville, “Dynamics of Belgian Plurinational Federalism”, 233; Sinardet, “Le fédéralisme consociatif belge”, 28.

78. Belgian Constitution, art. 4 al. 3.

79. *Ibid.*, 54.

80. *Ibid.*, 143.

81. See Romainville, “Dynamics of Belgian Plurinational Federalism”, 233; Sinardet, “Le fédéralisme consociatif belge”, 29-31.

82. See Romainville, “Dynamics of Belgian Plurinational Federalism”, 233; Sinardet, “Le fédéralisme consociatif belge”, 31-33.

regions and communities have many powers and competences, (4) the political system is not necessarily “highly” decentralised and that the federal level remains relevant. Moreover, while it is true (5) that the boundaries of the federated entities coincide as much as possible with the cleavages of the society, Belgium has not opted for (6) a large number of federated entities, which are small in size. If Brussels and the German Community certainly fit that criteria, Flanders and Wallonia do not. And that leads to a bipolar system where the two dominant groups are at the centre of the power relations. That being said, there are also (7) asymmetrical features in the Belgian federal system, such as, for instance, the fusion of the Flemish Region and the Flemish Community.

At the end of the day, when looking at the history and the political and constitutional system of Belgium, one may probably have the impression that it is first and foremost a consociation and that federalism was a way to further complete the power-sharing arrangement between the Flemish and Francophones. Therefore, Belgium could probably be more accurately described as a federal consociation, *i.e.* a society primarily based on a consociational functioning in which federalism appears as a complementary feature.

3.2. *Concordance in the (Fragmented) Swiss Federalism*

To a certain extent, Switzerland has a lot in common with Belgium. They are two small European federal states with a similar population and geographical area. Both emerged as “modern sovereign states” in the first half of the 19th century, and both are home to a significant linguistic and cultural diversity. Furthermore, both countries have opted for power-sharing mechanisms rather than majoritarian democracy. And yet, Olivier Duhamel and Guillaume Tusseau once wrote that Switzerland is the “Anti-Belgium,” justifying their claim because of the relatively peaceful linguistic relations in Switzerland, and because direct democracy is a major component of the Swiss system.⁸³

The latter may come as a surprise: it is generally considered that direct democracy is ill-suited⁸⁴ to divided societies. Indeed, because “they cannot measure

83. Duhamel & Tusseau, *Droit constitutionnel et institutions politiques*, 285.

84. Arieli-Horowitz, “Referenda in a Post-Consociational Democracy”, 147.

intensities of beliefs or work things out through discussion and discovery, referendums are bound to be more dangerous to minority rights than representative assemblies.”⁸⁵ Stephen Tierney sums up the problem of direct democracy in divided societies in these words: “since popular legitimacy is so often assumed to be represented by a simple majority in a referendum, we are [...] confronted with the particular pathology of referendums if such a model of majoritarianism in divided societies is used perversely to cement existing hegemonic relationships.”⁸⁶

For Vernon Bogdanor, such a divided society, “in order to obtain stability, needs to employ strategies that depart from the majoritarian model.”⁸⁷ Therefore, a consociational perspective would suggest strongly limiting the use of referendums, which Lijphart describes as the “most extreme majoritarian method of decision-making.”⁸⁸ And yet, some have described the system of direct democracy in Switzerland as “the cement that holds this heterogeneous society together,” adding that “heterogeneity and referendums go hand in hand in Switzerland.”⁸⁹

This is at the heart of Switzerland's very particular model of power-sharing, one that is often referred to as “concordance.” In short, concordance refers to (1) the rejection of majoritarianism in favour of consensualism, (2) the involvement of as many political parties as possible in the exercise of power, and (3) the frequent use of direct democracy.⁹⁰ In other words, one may argue that the rejection of majoritarianism in Switzerland is best realised by reaching out to both the involvement of many political parties in the political process and the use of direct democracy.

The Federal Council (the Swiss government) is at the core of the search for consensus. The Council is made up of seven councillors, and must “ensure that the various geographical and language regions of the country are appropri-

85. Butler & Ranney, “Theory”, 36.

86. Tierney, *Constitutional Referendums*, 78.

87. Bogdanor, “Western Europe”, 88.

88. Lijphart, *Patterns of Democracy*, 221.

89. Diskin et al., “Homogeneity, Heterogeneity and Direct Democracy”, 334.

90. See Ladner, “Society, Government, and the Political System”, 3.

ately represented.”⁹¹ In general, no political party gets more than two councillors, no canton gets more than one councillor, and two or three seats are reserved for the French and Italian minorities.⁹² The partisan division agreed in 1959 – the representation, by a maximum of two councillors, of the four main political parties in the Federal Council⁹³ – is called the *magic formula*.⁹⁴

As a result, the government usually benefits from a large degree of support in the Federal Assembly (the Swiss parliament). After the 2015 election, for example, the four parties in the coalition amounted together to 86% of the seats in the parliament. According to Nenad Stojanovic, “[n]o other democracy can claim to have such an ample consensus with regard to the composition of the executive.”⁹⁵ However, that number dropped to 76% after the 2019 elections, when the Green Party obtained more seats in the National Council (the lower house) than the Christian Democratic People’s Party.⁹⁶

Moreover, the Federal Council also operates following the consensus procedure, just as in Belgium.⁹⁷ Considering the pivotal role the Council plays in the Swiss political and constitutional life,⁹⁸ its composition and consensual process undoubtedly contribute to the search for consensus amongst political elites. This feature is central to consociationalism.

But concordance is also enhanced by direct democracy in Switzerland. Indeed, the multiple popular initiatives and referendums that occur every year in the Swiss system drive and reinforce the dynamic of concordance, precisely because they strongly encourage political elites to collaborate with each other.

91. Swiss Constitution, art. 175; Aubert, *Traité de droit constitutionnel suisse*, 528.

92. Voizard, “Réflexions autour de la légitimité du Conseil fédéral suisse”, 155-156.

93. The *Swiss People’s Party*, the *Social Democratic Party*, *FDP.The Liberals* and the *Christian Democratic People’s Party* (now *The Centre*, after its merger with the *Conservative Democratic Party*).

94. Stojanovic, “Party, Regional and Linguistic Proportionality Under Majoritarian Rules”, 41.

95. *Ibid.*, 42-43.

96. In doing so, the Green Party became the fourth most important party in the National Council, but the Christian Democratic People’s Party (now the fifth party represented in the National Council) still kept its seat in the Federal Council.

97. Duhamel & Tusseau, *Droit constitutionnel et institutions politiques*, 304; Voizard, “Réflexions autour de la légitimité du Conseil fédéral suisse”, 156-157.

98. Tsachevsky, *The Swiss Model – The Power of Democracy*, 76; Voizard, “Réflexions autour de la légitimité du Conseil fédéral suisse”, 168.

As such, before exposing themselves to a referendum ballot, elites try to ensure strong popular support for the measure they are intending to implement. According to Christine Guy-Ecabert, the “search for consensus commences already in the very first stage, the conceptualising one, of the pre-parliamentary phase.”⁹⁹ This is what leads Venelin Tsachevsky to write that in “modern times the Federal Council and the Federal Assembly essentially refrain from making any constitutional or legislative amendments if they are not assured of their strong public, political and cantonal support.”¹⁰⁰ Therefore, the projects that reach the referendum process are those most likely to succeed. And according to Hanspeter Kriesi, the “larger the consensus among the political elite, the greater the chance that citizens will follow its recommendations.”¹⁰¹

At the end of the day, direct democracy in Switzerland leads to consensus, and as such, contributes to the system of concordance.¹⁰² As Kriesi puts it: “In Switzerland, it is common knowledge that the existence of the direct-democratic opening of the political system exerts strong pressures on the political elite to come up with compromise solutions that can count on a large majority of its members.”¹⁰³ While concordance, with its direct democracy component, can be counterintuitive from a consociational perspective, we have to admit that it undoubtedly leads to a convincing result in Switzerland.

Nevertheless, here again, when looking at Lijphart's conditions for a society to be a consociational federation, we find that not all criteria are met. If Switzerland, of course, is (1) a democratic and (2) divided society, (3) not all four pillars of consociationalism are equally implemented.¹⁰⁴ Though the Swiss political system is (4) certainly decentralized, it remains (7) quite symmetrical. Also, if there is (6) a large number of federated entities, which are small in size, (5) the boundaries of the federated entities do not always perfectly coincide with the cleavages of the society. Indeed, there are four bilingual

99. Guy-Ecabert, “The Pre-parliamentary Phase in Lawmaking”, 96.

100. Tsachevsky, *The Swiss Model*, 109.

101. Kriesi, *Direct Democratic Choice*, 82.

102. See Schmitt, “Swiss Confederation”, 368; Fleiner & Hertig, “Swiss Confederation”, 334.

103. Kriesi, *Direct Democratic Choice*, 82.

104. While the grand coalition and proportional representation certainly are, the minority veto and segmental autonomy are only partially put in place.

or even trilingual cantons, while the linguistic and religious cleavages themselves do not coincide.

Cross-cutting cleavages in Switzerland would certainly have made consociationalism more difficult to implement in that country. This, combined with Switzerland's particular attachment to federalism and direct democracy, makes it, first and foremost, a *federation* with a *consensual culture*. This is primarily where its concordance system comes from.

3.3 *Cooperation in the (Mostly Territorial) Canadian Federalism*

It would be a mistake to describe Canadian federalism or Canadian democracy as consociational. Canada's constitutional system and architecture are much more in line with the majoritarian paradigm of Westminster parliamentarism. That being said, there are multiple dimensions to Canadian federalism, some being oriented towards collaboration, and therefore towards some sort of a consociational ideal.¹⁰⁵ One of them appears particularly salient to us, especially considering the divided nature of Canadian society: cooperative federalism.¹⁰⁶

Cooperative federalism is a growing phenomenon in Canadian constitutional law, especially in the case law of the Supreme Court of Canada and in the academic literature.¹⁰⁷ Broadly defined, cooperative federalism is a materialisation of the federal principle in which the federal and provincial governments of Canada can cooperate,¹⁰⁸ following a large variety of methods. As a subset of Canadian federalism, cooperative federalism itself takes many forms:

105. See Guénette, "Seven Variations of Federalism Guiding Canada's Constitutional Amending Formula".

106. In the wide category of "cooperative federalism", we also include here "executive federalism": Watts, *Executive Federalism*; Cameron & Simeon, "Intergovernmental Relations in Canada".

107. See Gaudreault-Desbiens & Poirier, "From Dualism to Cooperative Federalism and Back?"; Karazivan, "Cooperative Federalism vs Parliamentary Sovereignty"; Pless, "Uncooperative Thoughts About Cooperative Federalism".

108. Sometimes, the governments of the three northern territories and Indigenous leaders are also included.

overlapping jurisdictions, intergovernmental agreements, federal-provincial (-territorial-indigenous) partnerships, forums of cooperation, and so on.

According to the Supreme Court of Canada, cooperative federalism “describes situations where different levels of government work together on the ground to leverage their unique constitutional powers in tandem to establish a regulatory regime that may be *ultra vires* the jurisdiction of one legislature on its own.”¹⁰⁹ It is notably “used to facilitate interlocking federal and provincial legislative schemes and to avoid unnecessary constraints.”¹¹⁰ Essentially, in the words of the late Peter W. Hogg, cooperative federalism describes the “network of relationships between the executives of the central and regional governments [through which] mechanisms are developed, especially fiscal mechanisms, which allow a continuous redistribution of powers and resources without recourse to the courts or the amending process.”¹¹¹

This cooperation between orders of government can sometimes take shape in an explicitly consociational manner. One of the best examples of this may be the *Canada-Québec Accord relating to Immigration and Temporary Admission of Aliens*,¹¹² signed in 1991. The latter is better known as the McDougall-Gagnon-Tremblay Agreement, and was preceded by the Lang-Cloutier Agreement (1971), the Andras-Bienvenue Agreement (1975), and the Cullen-Couture Agreement (1979). In short, in this agreement, the governments of Canada and of Quebec agreed on the terms and conditions of a specific and asymmetrical immigration system for Quebec, at the latter's request.¹¹³

In a similar manner, but on a completely different issue, in 2019, the governments of Canada and Quebec also agreed on a joint process for the selection of potential candidates to be appointed to the Supreme Court of Canada for one of the three seats reserved for Quebec,¹¹⁴ another asymmetrical feature

109. *R. v. Comeau*, par. 87.

110. *Quebec (Attorney General) v. Canada (Attorney General)*, par. 17.

111. Hogg, *Constitutional Law of Canada*, 5-46; Poirier & Hartery, “L'ingénierie para-constitutionnelle”, 444.

112. Canada and Québec, *Canada-Québec Accord relating to Immigration and Temporary Admission of Aliens*.

113. See Béchard, “Immigration”.

114. Canada and Quebec, *Arrangement concerning the appointment process to fill the seat that will be left vacant*.

of Canadian federalism. In both these cases, the pillars of a grand coalition, of segmental autonomy, and of institutional asymmetry, all characteristics of consociational federalism, are fairly well implemented.

In a different manner, but still using the concept of cooperative federalism, in 2018, in its *Reference re Pan-Canadian Securities Regulation*,¹¹⁵ the Supreme Court of Canada ruled that a cooperative system proposed by the federal government, the provinces of Ontario, British Columbia, Saskatchewan, New Brunswick and Prince Edward Island, and the territory of Yukon to establish a unified and cooperative system for the regulation of capital markets in Canada was consistent with the Constitution.

This complex intergovernmental scheme, in which only half of the provinces would participate, is also an example of asymmetrical solution. Indeed, as Johanne Poirier points out: “the cooperative scheme at issue in the 2018 *Securities Reference* encouraged the elaboration of asymmetrical arrangements [...]. As such, asymmetry can be rather healthy in a diverse federation.”¹¹⁶ Here again, even if some provinces, such as Quebec and Alberta, were opposed to this system, the fact that Canadian federalism permits the elaboration of such asymmetrical schemes is in line with consociational federalism. Indeed, those provinces were able to stay out of the agreement and to preserve their autonomy.

At the end of the day, such cooperative structures, because they allow some partners to create something new, without forcing others to enter, may very well receive an “accommodating” interpretation from the courts.¹¹⁷ That being said, cooperative federalism does not seem to be something that can be used to “force the hand” of a partner who no longer wants to “cooperate,” as the long-gun registry case exemplifies.¹¹⁸ Therefore, cooperation between the Canadian federal partners must be voluntary at all times.

115. *Reference re Pan-Canadian Securities Regulation*.

116. Poirier, “The 2018 Pan-Canadian Securities Regulation Reference”, 121. See also Poirier & Hartery, “L’ingénierie para-constitutionnelle”, 448-452.

117. Poirier & Hartery, “L’ingénierie para-constitutionnelle”, 434; Poirier, “Souveraineté parlementaire et armes à feu”, 51; Karazivan, “Le fédéralisme coopératif entre territorialité et fonctionnalité”, 423.

118. In that decision, the Supreme Court ruled that the federal government wasn’t forced to transfer the data of the long-gun registry to Quebec, even if the province was asking for

Thus, in Canada, cooperative federalism is undoubtedly one of the most important manifestations of this desire for collaboration and accommodation amongst political elites. While Canada is certainly not a consociational democracy *per se*, this dimension of its federal system clearly shows that consociational federalism has been established and used as a way to accommodate its internal diversity.

But, here again – and not surprisingly, we should add –, all the conditions put forward by Lijphart for a society to be a consociational federation are not met in practice. Canada is indeed a (1) democratic and (2) divided society, but (3) it does not implement all four pillars of consociationalism. The proportional representation, veto powers and segmental autonomy pillars are implemented in many regards, but the grand coalition – the most important pillar of consociationalism – is not actually implemented on a day-to-day basis. Its best manifestations are intergovernmental conferences, which remain occasional. While the Canadian federal system is (4) fairly decentralised and often (7) asymmetrical, (6) not all provinces are necessarily small in size or in demographic terms; just think of Ontario and Quebec, two out of ten provinces where the majority of the country's population is concentrated.¹¹⁹ Finally, (5) the boundaries of the provinces do mostly coincide with the cleavages of the society, but there are English- and French-speaking minorities, as well as Indigenous nations, in all provinces.

At the end of the day, Canada is first and foremost a federation, and one that we would not qualify as *consociational*. But, as mentioned above, in such a territorial federation, cooperative federalism ends up giving the country's political and constitutional habitus a collaborative (and sometimes consensual) flavour. Perhaps most surprisingly, the cooperative dimension of Canadian federalism, where governments negotiate directly with each other, is largely driven by Westminster-style majoritarian parliamentaryism, which (1) makes it easier to form majority governments and (2) is thus antithetical

them, because the federal government acted within its own jurisdiction: *Quebec (Attorney General) v. Canada (Attorney General)*; See Karazivan, "Cooperative Federalism vs Parliamentary Sovereignty", 294.

119. As a matter of consequence, Quebec, the only province with a French-speaking majority, is surrounded by nine other provinces with an English-speaking majority, while the French-speaking population in Canada amounts to about 23%. See *Statistics on Official Languages in Canada*.

to the consociational ethos. Therefore, the core of the search for collaboration and consensus in the Canadian federal system, in line with a consociational spirit, is based on a majoritarian feature.

Conclusion

As we have seen, the theoretical model of consociationalism – which is now half a century old – and of consociational federalism have both been used, albeit rather differently, in Belgium, Switzerland and Canada. Those three divided societies, in which a latent and structural demographic crisis is always quietly looming, all have something in common: their political elites have employed consociational tools to accommodate their internal diversity, to create common institutions, to allow some autonomy to the different groups, and to foster a sense of loyalty and belonging between them.

Quite surprisingly maybe, and unlike what Lijphart wrote about the combination of federalism and consociationalism, the identification of the features of consociational federalism does not seem to be based so much on specific characteristics (the number of federated entities, their size, the presence of each pillar of consociationalism, etc.), but rather on a sincere and genuine intention on the part of all to solve common problems together. This explains how opposite tools in the search for consensus in a divided society, such as the very frequent use of direct democracy, in Switzerland, or majoritarian parliamentary democracy, in Canada, despite the obvious tensions that these phenomena may have with the concrete mechanisms of consociationalism, nevertheless manage to contribute to a *consociational culture* specific to each federal system.

As such, consociational federalism appears as a structuring principle, not of the entire constitutional and political systems of Belgium, Switzerland and Canada, but of the way they have attempted to put forward institutions, mechanisms and processes where all the groups of their internal diversity can come together and establish the foundations of their relationships or partnerships. At the end of the day, these three divided societies have experienced different paths that have led them not necessarily to consociational federalism, but at least to structures and mechanisms informed by consociationalism.

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