Constitutional Dismemberment in Constitutional Design

di Richard Albert[†]

Abstract: In this essay prepared for a special symposium issue of *Diritto pubblico comparato ed europeo* on my book "Constitutional Amendments: Making, Breaking, and Changing Constitutions" (Oxford University Press), I explain why constitutional designers should distinguish procedures for constitutional amendment from procedures for constitutional dismemberment, what kinds of constitutional reforms these procedures authorize, how courts should exercise their power of judicial review in relation to these two categories of procedures, and why codifying both in the same constitution advances the democratic values of the rule of law.

Keywords: Constitutional Dismemberment, Constitutional Amendment, Constitution of Chile, Constitution of Kenya, Reconstruction Amendments.

Introduction—Advising the Chilean Constitutional Convention

Last year I was invited to appear before the Constitutional Convention of Chile as it was writing a new constitution for the country. The Convention requested my advice on how to design procedures for constitutional reform. In my written and oral submissions to the members of the Convention, I recommended that they codify separate and distinguishable rules for constitutional amendment and constitutional dismemberment in their procedures of constitutional reform.

When the Convention later published its final draft of the new constitution, my attention was drawn especially to the procedures of constitutional reform in Articles 383-88. The Convention had agreed to codify rules for both constitutional amendment and dismemberment.[1]

In this essay prepared for a special symposium issue of *Diritto pubblico comparato ed europeo* on my book "Constitutional Amendments: Making, Breaking, and Changing Constitutions," published by Oxford University Press, I explain why the Convention was right to distinguish procedures for

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[1] In the end, Chileans voted in a national referendum to reject the Convention's proposed constitution for reasons unrelated to the rules of constitutional reform. *See* J. Nicas, *Chile Says "No" to Left-Leaning Constitution After 3 Years of Debate*, N.Y. Times, Sept. 4, 2022.

constitutional amendment from procedures for constitutional dismemberment, what kinds of constitutional reform these procedures authorize, and why codifying both in the same constitution advances the democratic values of the rule of law. I begin by defining a constitutional amendment in contrast to a constitutional dismemberment. Next I return to the rules of constitutional reform in the final draft of the Chilean Constitution to situate their design among the world's three basic models of constitutional reform. And I then probe the role of courts when confronting controversies in constitutional change.

First, however, I thank Giuseppe Franco Ferrari and Davide Zecca for hosting this symposium. I am grateful to Antonia Baraggia, Claudio Martinelli, and Arianna Vedaschi for coordinating it all from start to finish. And I thank Benedetta Barbisan, Mark Graber, Claudio Martinelli, and Luigi Melica for contributing rich, thoughtful, and challenging essays in response to my book. Their interest in my scholarship is a gift that can never be repaid.

1. Constitutional Amendment and Constitutional Dismemberment

When I first introduced the theory of constitutional dismemberment, I stressed that some constitutional amendments are not amendments at all.[2] They are self-conscious attempts to reject the essential characteristics of the constitution and to destroy its foundations. These constitutional changes demolish the basic structure of the constitution while at the same time building a new foundation rooted in principles contrary to the old. They are large-scale constitutional changes that amount to revolutionary reforms with major consequences for both law and society. I explained then and continue to believe now that it is a category error to identify transformative constitutional changes like these as "constitutional amendments," as though they were no different from ordinary constitutional changes. That is why I suggested that these "big" constitutional changes are better understood as constitutional dismemberments.

1.1. The Scope of Constitutional Reform

There are several differences between a constitutional amendment and a constitutional dismemberment, but the key point of distinction involves the scope of the reform.[3] In contrast to a constitutional amendment, a constitutional dismemberment exceeds the boundaries of the existing constitution. It entails a fundamental transformation of one or more of the constitution's core commitments: it alters the identity, the fundamental rights, or the basic structure of the constitution. To use a rough shorthand, the purpose of a constitutional dismemberment is to *unmake* a constitution. It is a transformative constitutional change that seeks deliberately to disassemble one or more of a

[2] R. Albert, *Constitutional Amendment and Dismemberment*, 43 *Yale J. Int'l L.* 1 (2018).
[3] For a full elaboration of the differences between a constitutional amendment and a constitutional dismemberment, *see* R. Albert, *Constitutional Amendments: Making, Breaking, and Changing Constitutions*, 61-92 (2019).

constitution's elemental parts, resulting in an altogether new constitution even though no new constitution has been proposed, drafted, or promulgated.

A constitutional amendment does not go nearly as far. Properly defined, an amendment keeps the constitution consistent with its existing design, framework, and underlying presuppositions. We can understand a constitutional amendment as the continuation of the constitution-making project in line with the constitution as it exists immediately prior to the change.

The power of constitutional amendment may be used to achieve one of four principal purposes. It may be used to correct, elaborate, reform, or restore the constitution. For instance, an amendment may be enacted to correct the constitution's design where it is necessary or useful to align our expectations with the operation of the constitution.[4] An amendment may alternatively be elaborative. Like a correction, an elaboration continues the constitution-making project in line with the current design of the constitution. But instead of repairing an error in the constitution, an elaboration advances the meaning of the constitution within of the boundaries of its existing design.[5] An amendment may also be reformative insofar as it is enacted to revise a rule in the constitution without undermining the constitution's core principles and without changing its operation in a transformative way.[6] Lastly, an amendment may be restorative: it may return the constitution to an earlier meaning that lawmakers believe has been lost or forgotten.[7] In all cases, a constitutional amendment—in order to be properly understood as an amendment—must entail unbroken unity with the constitution being amended. It cannot push the boundaries of the constitution any further than its outermost limits.

1.2. The Paradigm Case of Constitutional Dismemberment

A constitutional dismemberment, then, is a constitutional change that sets the constitution and the jurisdiction on a new course not envisioned under the existing constitution. This kind of transformative change can occur suddenly in a big-bang moment or gradually by erosion or accretion. And it can occur to constitutions both codified and uncodified. We should distinguish dismemberments from amendments because they differ in form and content.

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[4] The Twelfth Amendment to the U.S. Constitution is an example of a corrective amendment. It requires Electoral College electors to cast two differentiated votes: one for president and another for vice-president. *See* Constitution of the United States, amend. XII.

[5] The Nineteenth Amendment to the U.S. Constitution—which prohibits states from denying the right to vote on the basis of sex—is an example of an elaborative amendment. *See* Constitution of the United States, amend. XIX.

[6] The Twentieth Amendment to the U.S. Constitution—which changes the date of the president's installation from March 4 to January 20—is an example of a reformative amendment. *See* Constitution of the United States, amend. XX.

[7] The Twenty-Second Amendment is an example of a restorative amendment. It codifies the political practice initiated by George Washington's decision to serve as president for no more than two terms. *See* Constitution of the United States, amend. XXII.

The paradigm case of a constitutional dismemberment occurred in the United States. The trio of changes commonly known as the "Reconstruction Amendments"—the Thirteenth, Fourteenth, and Fifteenth Amendments—is best understood as something other than a package of constitutional amendments. None of them can be said to have corrected, elaborated, reformed, or restored the meaning of the constitution as it was understood at the time of their enactment. They did not correct the constitution in terms of fixing an error in its operation, nor did they elaborate the constitution's meaning consistent with its legal understanding before Reconstruction. They did not reform the constitution in a way that retains fidelity with its existing design, nor did any of these three constitutional changes seek to restore the meaning of the constitution to what it once meant under law. They had an altogether different effect and impact on the United States Constitution and on the country.

The "Reconstruction Amendments" had many functions in the United States. They consolidated the Union victory over the Confederate States. They proclaimed the triumph of the free-state north over the slave-state south. And they wrote into the constitution a ringing declaration of the promise of the equality of all persons. Yet as important as these functions were then and now, the single-most important effect of the Reconstruction Amendments was to demolish the infrastructure of slavery in the original constitution. They tore down the major constitutional pillars of America's slavocratic constitution: the Three-Fifths Clause,[8] the Fugitive Slave Clause,[9] the Migration or Importation Clause,[10] and the Proportionate Tax Clause.[11] The Reconstruction set the country on a new course, transformed the purpose and identity of the constitution, and remade the fundamental commitments of the constitution in both law and society. To put it another way, the "Reconstruction Amendments" were much more than amendments; they were constitutional dismemberments that rewrote the constitution while keeping legal continuity within the regime.

These major constitutional changes were enacted using the procedures of constitutional amendment. But they should have been enacted using different procedures of constitutional reform: procedures designed exclusively to enact constitutional dismemberments. As I explain below, there are many different categories of procedures of constitutional change, and it is important to distinguish them according both to their uses and their required thresholds.

2. The Modern Models of Constitutional Reform

There are many ways to classify constitutional reform procedures. For instance, they can be classified according to the majorities required for a reform, as in Arend Lijphart's classification according to voting thresholds: ordinary majority, two-thirds majority, less than two-thirds majority but more than an

[8] Constitution of the United States, art. I, § 2, cl. 3.
[9] *Id.* art. IV, § 2, cl. 3.
[10] *Id.* art. I, § 9, cl. 1.
[11] *Id.* art. I, § 9, cl. 4.

ordinary majority, and more than two-thirds majority.[12] Constitutional reform procedures may alternatively be classified according to a combination of voting thresholds and non-voting criteria. Jon Elster, for example, identifies six "hurdles" in the way of enacting a reform, including supermajority approval, quorum requirements, delays, absolute entrenchment, subnational ratification, and referendums.[13] One additional method of classification focuses less exclusively on thresholds or other quantifiable characteristics of constitutional reform, and instead organizes constitutional reform models according to regime types. Alkmene Fotiadou and Xenophon Contiades pinpoint five such regime reform types: elastic, evolutionary, pragmatic, distrust, and direct-democratic.[14] All of these classifications are informative. But for our purposes, there is a more useful descriptive classification of constitutional reform procedures in the world.

2.1. Three Basic Categories

There are three basic categories of constitutional reform procedures: (1) the one-size-fits-all model, represented by the German Basic Law; (2) the dualist model, illustrated by the Canadian Constitution; and (3) the tripartite model, codified in the Ecuadorian Constitution. Each of these models has strengths and weaknesses but two of them share an important similarity in common: they codify procedures for both constitutional amendment and dismemberment.

Begin with the German Basic Law. It authorizes constitutional reforms using only one procedure: "Any such law shall be carried by two thirds of the Members of the Bundestag and two thirds of the votes of the Bundesrat."[15] This procedure may be used to make all manner of changes to the constitution, from small housekeeping alterations to transformative constitutional revisions. The rules of reform do not differentiate one kind of change from another in the procedure that must be used to enact it. All constitutional reforms are achievable using the same constitutional procedure. The German Basic Law represents the one-size-fits-all model of constitutional reform.

[12] *See* A. Lijphart, *Patterns of Democracy: Government Forms and Performance in Thirty-Six Countries*, 207 (2d ed. 2012); *see also* E. Schneier, *Crafting Constitutional Democracies: The Politics of Institutional Design*, 222-25 (2006) (classifying reform procedures into five categories and nineteen subcategories of voting thresholds).

[13] *See* J. Elster, *Ulysses Unbound: Studies in Rationality, Precommitment, and Constraints*, 100-03 (2000); *see also* J.-E. Lane, *Constitutions and Political Theory*, 41 (2d ed. 2011) (classifying reform procedures into a combination of voting thresholds and non-voting criteria); D.S. Lutz, *Principles of Constitutional Design* 174–77 (2006) (classifying reform procedures into four general amendment strategies).

[14] *See* X. Contiades and A. Fotiadou, *Models of Constitutional Change*, in *Engineering Constitutional Change: A Comparative Perspective on Europe, Canada and the USA* 417, 440–57 (Xenophon Contiades, ed., 2013); *see also* R. Albert, *Nonconstitutional Amendments*, 22 *Can. J. L. & Juris.* 5, 12-31 (2009) (identifying three major regimes of constitutional reform: textual, political, and substantive).

[15] Basic Law of Germany, art. 79(2).

The second model is dualist. It authorizes two different kinds of constitutional reforms: constitutional amendments and constitutional dismemberments, each one achievable using different procedures of constitutional change. The Canadian Constitution offers a good illustration. It allows legislators at the federal and provincial levels to enact constitutional amendments—meaning changes that do not affect the constitution's identify, fundamental rights, or basic structure—using one of several procedures requiring various degrees of approval.[16] And it also allows legislators at the federal and provincial levels to enact constitutional dismemberments—meaning changes that transform the constitution's identify, fundamental rights, or basic structure—but only with a more onerous level of consent. A constitutional dismemberment requires approval from each of the provincial legislative assemblies as well as the House of Commons and the Senate in the Parliament of Canada.[17] What amounts to a constitutional dismemberment in Canada is a change to the country's most important constitutional commitments, including its status as a constitutional monarchy, its use of official languages, and the composition of its Supreme Court.[18] This model is dualist because it distinguishes procedures for small-scale changes that retain the core of the constitution from procedures for large-scale changes that transform it.

The third model is tripartite. Under this model of constitutional reform, the constitution authorizes three types of formal change, each with an increasingly more onerous procedure: (1) constitutional amendment, which refers to any change that does not affect the constitution's rights or its reform procedures; (2) constitutional dismemberment, which refers to any change that does not affect the constitution's structure, rights or its reform procedures; and (3) constitutional replacement, which imposes no limitations at all on what may be changed, but must be done by a Constituent Assembly in combination with a national referendum. This model, seen in Ecuador,[19] is tripartite given its authorization of three separate reform procedures.

2.2. Constitutional Reform Procedures in Chile

Return now to the final draft of Constitution of Chile. It may be classified within the tripartite model. It codifies procedures for the three major kinds of formal constitutional change: constitutional amendment, constitutional dismemberment, and constitutional replacement.

Under the final version of the constitution, a constitutional amendment may be initiated in one of four ways: by presidential action, legislative decision-making, popular initiative, and by Indigenous initiative.[20] Once initiated, an

[16] Constitution Act, 1982, enacted as Schedule B to the Canada Act 1982, 1982, c. 11 (U.K.), ss. 38-40, 42-44.
[17] *Id.* s. 41.
[18] *Id.*
[19] Constitution of Ecuador, arts. 441-42, 444.
[20] Constitution of Chile (proposed July 4, 2022), art. 388(1).

amendment proposal may be enacted with an approval vote of four-sevenths of the members of the Congress of Deputies and of the Chamber of Regions.[21]

The final draft constitution also authorizes constitutional dismemberments.[22] The procedure for constitutional dismemberment is more onerous than what is required for a constitutional amendment because a dismemberment is a larger-scale change than is typical of an amendment. The constitution is clear about what kinds of proposed reforms require recourse to the procedures of constitutional dismemberment: those that substantially alter fundamental rights and principles, the separation of powers, the presidential term, the design and duration of the legislative power, the form of the regional state, and the rules of constitutional reform themselves.[23] A constitutional dismemberment may be initiated by any of the four ways to initiate a constitutional amendment. But in addition to an approval vote of four-sevenths of the members of the Congress of Deputies and of the Chamber of Regions (which is all that is required to enact a constitutional amendment), enacting a constitutional dismemberment also requires a successful popular referendum.[24]

The final draft of the failed Chilean Constitution outlines a procedure for a third kind of reform: replacing the existing constitution with an altogether new one.[25] The constitution stresses that a replacement can occur only through a Constituent Assembly that may be convened only by a constituent referendum.[26] Once the Constituent Assembly is authorized, its members must be elected according to principles of gender equality, territorial representation, and cultural diversity, including guaranteed seats for Indigenous persons.[27] The task of the Constituent Assembly is to then draft a new constitution, which may be enacted only in a successful popular referendum.[28]

This tripartite model of constitutional reform need not codify only three procedures. Each of the categories of reform—amendment, dismemberment, and replacement—may have more than one procedure within it. The key point is that it is a tripartite model because it authorizes three different categories of procedures for constitutional reform: one set of procedures for constitutional amendment, another for constitutional dismemberment, and a third set for constitutional replacement. A given constitution could be classified within this tripartite model even if it had two distinct procedures for constitutional amendment, two for constitutional dismemberment, and two for constitutional replacement, or any combination of options for each of the three major

[21] *Id.* art. 388(2).
[22] *Id.* arts. 384-85.
[23] *Id.* art. 384(1).
[24] *Id.* There is an exception to this procedure. If a constitutional dismemberment is approved by an extraordinary supermajority of two-thirds of the members of the Congress of Deputies and of the Chamber of Regions, the constitution does not require its ratification by popular referendum. *Id.* art. 384(2).
[25] *Id.* arts. 386-88.
[26] *Id.* art. 385(1).
[27] *Id.* art. 387.
[28] *Id.* art. 388.

categories. The essential feature of this tripartite design of constitutional change is the procedural distinction among the three different categories of constitutional reform.

When it was released, the final draft of the failed Chilean Constitution raised an important question: what would its tripartite model of constitutional reform mean for the role of courts had it been approved? Recent developments at the Kenyan Supreme Court open a window to the answer.

3. Constitutional Dismemberment in Constitutional Politics

A few months earlier this year, the eyes of the public law world turned to Kenya when the Supreme Court issued a landmark ruling that reverberated across the region and the world.[29] The Court announced its highly-anticipated judgment on the constitutionality of the Building Bridges Initiative Constitutional Amendment Bill. Known as the BBI, it is a multi-subject constitutional reform initiative that made multiple proposals to change different and unrelated parts of the Kenyan Constitution. And it combined all of these reform proposals into one single enormous bill that sought to transform some of the most fundamental commitments in the country's constitution.

3.1. The Failed Constitutional Dismemberment

The BBI spanned over 40 pages in total, it contained 74 amendment articles, and it included two Schedules appended to the main text.[30] It was an enormous package of constitutional reforms. The BBI proposed to amend virtually every major part of the Constitution: Chapter Two on the republic, Chapter Three on citizenship, Chapter Four on the bill of rights, Chapter Seven on the electoral system, Chapter Eight on the legislature, Chapter Nine on the executive, Chapter Ten on the judiciary, as well as important subjects in Chapters Eleven, Twelve, Thirteen, Fourteen, Fifteen and Sixteen of the Kenyan Constitution.[31] The BBI was a mega-constitutional reform that, if successfully enacted, would affect almost the entirety of the Constitution, effectively leaving none of the existing Constitution unchanged either expressly or by implication.

It therefore came as no surprise when the BBI was challenged in court as an unconstitutional reform. The lower courts ruled that the BBI was an unconstitutional reform.[32] But would the Supreme Court rule the same way?

[29] Petition No. 12 of 2021 (consolidated with Petitions 11 & 13 of 2021) (Supreme Court of Kenya).
[30] The Constitution of Kenya (Amendment) Bill, 2020.
[31] *Id.*
[32] *See* Petition No. E282 of 2020 (Consolidated) (High Court of Kenya); Petition E291 of 2021 & Civil Appeal E292, E293 & E294 of 2021 (Consolidated) (Court of Appeal of Kenya).

The Kenyan Supreme Court's ruling was striking. The Court held that the BBI was unconstitutional.[33] Specifically, Supreme Court judges declared that the BBI was unconstitutional because it was not a proper constitutional amendment and that instead it amounted to a constitutional dismemberment. And because the BBI was a constitutional dismemberment, the BBI could not be enacted using the ordinary procedures of constitutional amendment. The BBI was therefore invalidated, it has not been enacted, and it is now laid to rest.

The Kenyan Supreme Court's ruling in the BBI is not unlike several rulings issued by the Indian Supreme Court,[34] the Colombian Constitutional Court,[35] and the Constitutional Court of the Czech Republic,[36] each of which has invalidated constitutional reforms for exceeding the boundaries of permissible constitutional amendments. When these courts have determined that constitutional reformers tried to use the procedures of constitutional amendment to enact a constitutional dismemberment, these courts have declared those reforms unconstitutional. According to judges on the Kenyan Supreme Court, it was because the package of reforms in the BBI amounted to a constitutional dismemberment that they were declared unconstitutional.

3.2. Authorizing Constitutional Dismemberment

Had the proposed Chilean Constitution been approved, the Constitutional Court would not have had to make similar declarations of unconstitutionality. The rules of constitutional reform in the proposed constitution authorize both small- and large-scale changes, and therefore anticipate not only the possibility but also the legality of constitutional dismemberment. The constitutional reform procedures codified in the draft constitutional text are explicit about what is required to enact a constitutional dismemberment. As a consequence, the Chilean Constitutional Court would have been relieved of the burden of having to determine whether the unwritten rules of the new constitution would permit or prohibit political actors to enact a constitutional dismemberment, and if yes, by what procedure. This would accordingly have kept the Court out of the line of political fire that has targeted the Supreme Court of Kenya since it issued its controversial ruling on the constitutionality of the BBI. And keeping the Chilean Constitutional Court out of political battles like the one triggered by the BBI would protect the Constitutional Court's integrity, impartiality, and independence—all of which suffer when a court's judgments are attacked as politically-motivated or wrong on the merits.

Nonetheless, the Chilean Constitutional Court would still have had an important supervisory function under the procedures of constitutional reform,

[33] Petition No. 12 of 2021 (consolidated with Petitions 11 & 13 of 2021) (Supreme Court of Kenya).
[34] *See, e.g.*, Minerva Mills Ltd v Union of India, 1980 AIR 1789 (Supreme Court of India).
[35] *See, e.g.*, Judgment C-1040/2005 (Constitutional Court of Colombia).
[36] *See, e.g.*, 2009/09/10 - Pl. ÚS 27/09: Constitutional Act on Shortening the Term of Office of the Chamber of Deputies (Constitutional Court of the Czech Republic).

had the proposed constitution been approved. But its role would not have been particularly controversial: it would have been to evaluate the procedures used to enact constitutional reforms to ensure that the correct one is used when the reform process is initiated. The Chilean Constitutional Court's role would have been like the role of the Ecuadorian Constitutional Court or the Canadian Supreme Court. In Ecuador, it is up to the Court to decide when there is a disagreement about which procedure constitutional reformers must use to reform the constitution.[37] The same is true of the Canadian Supreme Court. It is often asked to determine which reform procedure must be used to make a given constitutional change: is it one of the procedures for constitutional amendment or is it the procedure for constitutional dismemberment?[38]

Had the draft Chilean Constitution been ratified, the role of the Constitutional Court would have been to determine whether a proposed reform must be enacted using the codified procedure of constitutional amendment, of constitutional dismemberment, or of constitutional replacement. The codification of these reform procedures in the constitutional text would have moreover insulated the Court from the intense criticism leveled at many other courts around the world that adjudicate similar questions under constitutions that do not codify separate and distinguishable procedures for constitutional amendment and constitutional dismemberment.

4. Conclusion—Designing Procedures for Constitutional Reform

When I am asked for advice on designing the procedures of constitutional reform, I recommend that constitution-makers codify procedures for both constitutional amendment and constitutional dismemberment. But it is not enough to differentiate procedures for both types of reform. Constitution-makers must also specify what kinds of reforms will require recourse to each procedure of reform. How should this decision be made, and by whom?

Distinguishing between what counts as a constitutional amendment or a constitutional dismemberment should be done at the stage of constitutional creation. Constitution-makers can create different procedures for amending the constitution and others for dismembering it, the former requiring a less onerous configuration and quantum of political agreement than the latter. What emerges in this process of decision-making is a hierarchy of constitutional importance, with some parts or principles of the constitution made changeable using dismemberment procedures and others using amendment procedures.

Codifying separate and distinguishable reform procedures for both constitutional amendment and constitutional dismemberment at the stage of constitutional creation forces a choice: what is most important in the polity? The more important matters should be made changeable using only the more involved procedures of dismemberment, while the less important ones should be made changeable using the easier procedures of amendment. Constitutional

[37] *See, e.g.*, Dictamen No. 001-14-DRC-CC (Constitutional Court of Ecuador).
[38] *See, e.g.*, Reference re Senate Reform [2014] 1 S.C.R. 704 (Supreme Court of Canada).

designers may choose also to codify unamendable rules that protect what are regarded as fundamental features of the polity. In this scenario, the procedures of constitutional reform would codify rules that are changeable using only procedures of constitutional amendment, rules changeable using only procedures of constitutional dismemberment, and unamendable rules changeable only by creating a new constitution.

I will not be surprised if future constitution-makers regard the draft Chilean Constitution as a good model for constitutional reform procedures. Even though the final draft was rejected decisively, it reflects the modern vanguard of constitutional design. A key feature of this modern vanguard of constitutional design is the codification of reform procedures for both constitutional amendment and constitutional dismemberment. I expect that we will see the dualist or tripartite models of constitutional reform with increasing frequency in the new constitutions of the world—and with good reason, because they bring clarity, predictability, and logic to constitutional reform.

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