

Multilingual Countries in Comparison: Reflections on the Case of Syria

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Europäisches Zentrum für Kurdische Studien
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1. Introduction

On 16 January 2026, the Syrian interim government, led by Ahmed al-Sharaa, issued Decree No. 13, promising what appeared to be a significant departure from the decades-long repression of Kurdish citizens under Ba'ath Party rule. The decree recognizes Kurdish identity as an integral part of Syria's national fabric, grants Kurdish the status of a "national language", allows Kurdish to be taught in schools, and restores citizenship to all Syrian Kurds. However, the decree's vague wording and the absence of a clear implementation plan raise questions about the government's commitment to translating these provisions into practice.

This paper focuses on the future status and use of the Kurdish language, particularly in education and, where relevant, public administration. A number of multilingual states have developed language policies aimed at recognizing linguistic diversity and protecting and promoting minority languages. Examining the approaches adopted in other countries may therefore provide useful insights for the Kurdish case in Syria. How can an appropriate balance be found between Arabic, the language of the majority, and Kurdish as a minority language? Which approaches and specific mechanisms have proven effective in protecting and promoting minority languages, and language diversity more generally?

To explore these questions, this paper critically examines the language policies of Canada, Switzerland, Italy (South Tyrol), South Africa, Belgium, India, Spain, and Iraq (the Kurdistan Region of Iraq). Based on these comparative examples, it offers initial ideas about what a multilingual system in Syria could look like, while also identifying potential obstacles and areas of concern. Before turning to the comparative cases, however, the paper briefly outlines the history of language policy in Syria.

2. Kurdish Language Rights under Ba'ath Rule and the AANES

The Ba'ath Party seized power in Syria in the 1963 coup and subsequently pursued a policy of forced Arabization. This policy included, among other measures, severe restrictions on the use of Kurdish – in Syria predominantly the Kurmanji dialect – introduced through a series of decrees and administrative measures during the 1970s, 1980s, and 1990s. As a result, the Kurdish names of hundreds of villages in Hasakah Governorate and the 'Afrin region were replaced with Arabic names. Further regulations restricted the use of Kurdish in the workplace. Non-Arabic songs were prohibited at weddings and other celebrations, as was the registration of children under non-Arabic names. Businesses bearing non-Arabic names were required to change them, while shops selling Kurdish videos or audio cassettes were closed.

Although these measures were not consistently enforced, their existence alone had a disciplinary effect on the Kurdish population (KurdWatch 2009: 16).

In 2012, one year after the outbreak of the uprising that developed into the Syrian civil war, Kurdish political and military actors began establishing a system of de facto autonomy in northeastern Syria. The Democratic Union Party (PYD) emerged as the dominant political force, while the People's Protection Units (YPG) became the principal Kurdish armed forces. The Syrian Democratic Forces (SDF), a broader military coalition established in 2015, subsequently became the dominant military actor in the territories governed by the autonomous administration. As Kurdish-led self-administration developed from 2012 onwards – later institutionalized under what became known as the Autonomous Administration of North and East Syria (AANES), and subsequently the Democratic Autonomous Administration of North and East Syria (DAANES)¹ – the Kurdish Language Institute (SZK) was able to organize Kurdish-language courses openly. On 14 October 2012, Kurdish was introduced as a subject in 97 schools in Kobanî that continued to operate under the Syrian government's education system. In 2014, the autonomous administration established a curriculum body that began developing Kurdish-language curricula. Initially consisting of seven members, the team later expanded to more than 100 staff and drew on the support of additional experts (Ali 2025).

According to Ali (2025), during the 2012–2013 school year, three weekly Kurdish-language classes were introduced at all grade levels in schools in Kobanî, 'Afrin, and the Jazira region. This arrangement remained in place until the 2015–2016 school year, when the Syrian government curriculum was replaced by newly developed curricula of the autonomous administration. Schools located in the government-controlled security squares of Qamishli and Hasakah, as well as a number of church-run and private schools, continued to follow the Syrian government curriculum (Martin 2026: 121). The new system initially introduced education in students' native languages through grade six in Kobanî and 'Afrin and through grade three in Jazira. In the following school year, native-language instruction was extended through secondary education in Kobanî and 'Afrin and through grade six in Jazira. By 2020, schools in Jazira had also adopted the AANES curricula through secondary education. As a result, the region's three principal local languages – Kurdish, Arabic, and Syriac – were formally established as languages of instruction throughout the AANES education system (Ali 2025).

According to Samîra Hac Elî, co-chair of the region's Education and Teaching Committee, at the beginning of the 2024–2025 school year, all pupils belonging to the main linguistic communities in the Kurdish-administered areas of northeastern Syria began their education in their mother tongue. This remained the language of instruction during the first three grades, after which pupils began learning the language of another local linguistic community (Medya News, 7 September 2024). From grade four onwards, Kurdish-speaking pupils therefore learned Arabic as a second language, while Arabic-speaking pupils learned Kurdish. English was introduced as a third language from grade six (Martin 2026: 113).²

1 For the shift from AANES to DAANES see Broomfield 2023.

2 According to Boyle Espinosa and Ronan (2023: 2292), whose research refers to 2018, students began studying the region's two other main languages alongside their first language from grade four onwards.

The legal basis for these language policies was first established in the 2014 Social Contract. Article 9 recognized Kurdish, Arabic, and Syriac as the official languages of the Jazira Canton and affirmed the right of all communities to teach and receive education in their native language (Charter of the Social Contract 2014). The Social Contract was subsequently revised several times. In its most recent version, adopted in December 2023, Article 7 recognizes Arabic, Kurdish, and Syriac as official languages throughout the territories of the Democratic Autonomous Administration (Bodette 2026a).

In practice, however, the use of Syriac as a language of instruction in public schools appears to have remained extremely limited. Many Assyrian pupils instead received education in their mother tongue in private church-run schools. At a workshop on language rights held on 28 March 2026, Shiwan Ibrahim, a political activist and expert on language rights in the former AANES, stated that he was not aware of any Assyrian pupils attending public schools in which Syriac was used as the language of instruction. This assessment is broadly consistent with figures provided by the Education Board: of 714,214 pupils reported to have received mother-tongue education in AANES schools in 2025, 102,142 were taught in Kurdish, 612,047 in Arabic, and only 25 in Syriac (Ali 2025). While most of the statistics presented by Ali concern the predominantly Kurdish regions of Kobanî, ‘Afrin, and Jazira, the very high number of pupils receiving instruction in Arabic – approximately six times the number receiving instruction in Kurdish – strongly suggests that these figures also cover the predominantly Arab areas of Deir ez-Zor, Raqqqa, and Manbij.

In the predominantly Arab areas, the introduction of the AANES curriculum remained contested. Initially, schools therefore relied on UNICEF self-learning materials based on the Syrian government curriculum. These materials were designed to provide basic educational opportunities for children who had missed schooling or dropped out and covered Arabic, mathematics, science, and English. Over time, the autonomous administration gradually supplemented these materials with elements of its own curriculum. From the 2022–2023 school year onwards, for example, scientific subjects from the AANES curriculum were incorporated. Religious education was also included in response to demands from local communities (Martin 2026: 106).

The AANES education system faced a number of significant challenges. First, its Kurdish-language curricula were not integrated into Syria’s national education system. As a result, students could face difficulties having their school and university certificates recognized when seeking further education or employment outside AANES-administered areas (Beishenkulova 2025). A further challenge concerns Arabic-language proficiency. Many Kurdish pupils who have received most or all of their education in Kurdish no longer speak Arabic fluently, despite Arabic remaining the dominant language in most parts of Syria. This can place them at a significant disadvantage when seeking higher education or employment outside predominantly Kurdish-speaking areas.

Secondly, the resources allocated by the AANES to education remained limited, particularly in relation to the revenues generated from oil, taxation, and trade. School infrastructure had

already suffered from decades of neglect under Ba'ath rule, and substantial and sustained investment would have been necessary to improve conditions. The education system also faced shortages of teaching materials and qualified teachers. When the AANES education system was first established, proficiency in Kurdish was an important criterion for recruiting teachers, as large numbers of staff were needed to introduce Kurdish-language education. Many of those recruited, however, lacked advanced educational qualifications or previous teaching experience. At the same time, experienced teachers employed within the Syrian government education system were often reluctant to work with the AANES because they feared possible repercussions. These circumstances contributed to concerns among local communities about the quality of education provided in AANES schools (Martin 2026: 108).

Concerns about the quality and accessibility of education are supported by a recent study conducted between July and December 2025 in Kobanî and Jazira. The study surveyed 438 households with 1,250 children between the ages of six and seventeen, asking whether their children attended school and, if not, why. The results revealed alarmingly low levels of school attendance: 60.08 percent of the children surveyed were not attending school, with the proportion reaching 77.63 percent in Amuda. Among the reasons given by parents, 20 percent cited the poor quality of teaching as one of the main reasons for withdrawing their children from school, while 45.95 percent reported that schools were located too far from their homes (Hajo 2026). These findings suggest that, despite the development of an extensive new education system, the AANES failed to ensure adequate access to schooling and educational participation for a substantial proportion of children.

A further major challenge has been the disruption of educational continuity as a result of successive military conflicts and changes in territorial control. When Turkish forces and Turkish-backed armed groups took control of 'Afrin in 2018 and Ras al-'Ayn and Tel Abyad in 2019, the AANES education system ceased to operate in these areas, forcing pupils to adapt to a different curriculum. In the predominantly Arab regions of Deir ez-Zor and Raqqqa, many children experienced prolonged interruptions to their education during the years of ISIS control. Schools and educational infrastructure were also extensively damaged by military operations. After the SDF gained control of these areas, educational services had to be rebuilt under difficult conditions. However, as in the predominantly Kurdish regions, investment in education remained insufficient to address the scale of infrastructural damage and educational needs.

Another concern relates to the ideological orientation of the AANES curriculum. Boyle Espinosa and Ronan argue that, although curriculum designers deliberately avoided explicit references to Abdullah Öcalan, his ideas remained embedded throughout the curriculum. In their view, the limited exposure to alternative sources and perspectives risked undermining the critical thinking and freedom of choice that education should promote. They illustrate this problem with their observations at Rojava University: "Whilst they [curriculum design officials] told us they refrained from referencing Öcalan in an effort not to idolize him, his ideas are nonetheless implicit throughout the curriculum, and the lack of access to alternate sources or ways of thinking presents challenges for the critical thinking and free choice essential to

emancipatory education. For example, in Rojava university's library, we found very few non-technical books that were not either by or about Öcalan and his ideas" (Boyle Espinosa and Ronan 2023: 2294). The limited space for alternative approaches was not confined to the content of the curriculum. Schools that refused to adopt the AANES curriculum, including some Assyrian schools, faced the risk of closure (Boyle Espinosa and Ronan 2023: 2295).

By early 2026, the AANES system of de facto autonomy had largely unravelled. In January, fighting broke out over two predominantly Kurdish neighbourhoods in Aleppo that had previously been under SDF control. The conflict rapidly expanded eastwards, with government forces advancing into areas previously controlled by the SDF and pushing it back beyond the Euphrates. On 18 January, Interim President Ahmed al-Sharaa announced a ceasefire agreement with the SDF that envisaged the integration of the SDF into the Syrian state. The agreement also provided for the immediate transfer of the predominantly Arab governorates of Raqqqa and Deir ez-Zor to government control, together with responsibility for detention facilities holding former IS members, border crossings, and oil fields (Gritten and Hagan 2026). At the same time, government forces were not to enter the city centres of Hasakah and Qamishli or surrounding Kurdish villages. Against this backdrop of the rapidly changing relationship between Damascus and the Kurdish-led administration, Interim President al-Sharaa had issued Decree No. 13 on 16 January 2026.

3. Decree No. 13

Comprising eight articles, Decree No. 13³ recognizes Syrian Kurdish citizens as "an essential and authentic part of the Syrian people" and Kurdish culture as "an inseparable part of Syria's unified and diverse national identity" (Article 1). Article 2 recognizes Kurdish cultural and linguistic diversity and guarantees the right to preserve Kurdish heritage and arts and to "develop the Kurdish mother tongue within the framework of national sovereignty." Article 3 addresses the implementation of these principles in education:

"The Kurdish language is considered a national language and is permitted to be taught in public and private schools in areas where Kurds constitute a significant percentage of the population, as part of the elective curriculum or as a cultural and educational activity."

Article 4 grants Syrian citizenship to all persons of Kurdish origin residing in Syria, including those who had previously remained unregistered. Article 5 declares Nowruz, the Kurdish New Year, an official holiday throughout the country. Article 6 requires state media and educational institutions to adopt an "inclusive national discourse" and prohibits discrimination or exclusion on ethnic or linguistic grounds. Finally, Article 7 assigns the implementation of the decree to the "relevant ministries and authorities", while Article 8 provides for its immediate entry into force.

3 See a translation of Decree 13 at [https://en.wikisource.org/wiki/Translation:Decree-_No._13_of_2026_\(Syria\)](https://en.wikisource.org/wiki/Translation:Decree-_No._13_of_2026_(Syria)).

This paper focuses primarily on Article 3 and its implications for Kurdish language rights. The recognition of Kurdish as a “national language” appears promising at first sight. However, the decree does not specify what rights follow from this status. Does it mean only, as explicitly stated in Article 3, that Kurdish may be taught in public and private schools as part of the elective curriculum or as a cultural and educational activity in areas where Kurds constitute a significant percentage of the population? Or does recognition as a national language entail additional rights, such as the right to communicate in Kurdish with public authorities in these areas?

If the rights associated with the status of a national language are limited to those explicitly mentioned in the decree, Article 3 offers a very restricted vision of how such recognition translates into educational rights. First, Kurdish is not included in the mandatory curriculum but may only be offered as an elective, giving it a weaker position within the education system than Arabic. Second, Kurdish may be taught as a subject but is not recognized as a language of instruction. In this respect, its practical status resembles that of a foreign language such as English rather than that of a national language used in education. Indeed, its position is even weaker in one important respect, since English forms part of the mandatory curriculum whereas Kurdish does not.

Third, the territorial limitation raises questions about Kurdish speakers living outside predominantly Kurdish areas. By restricting Kurdish-language education to areas where Kurds constitute a “significant percentage” of the population, Article 3 may provide opportunities for Kurdish-language education in parts of Hasakah Governorate, ‘Afrin, and Kobanî, while excluding Kurdish communities in predominantly Arabic-speaking areas and cities such as Damascus and Aleppo. The decree therefore does not establish an individual right to learn Kurdish irrespective of a person’s place of residence. Finally, the language of “permission” itself is noteworthy. Rather than establishing a positive obligation on the state to protect and promote Kurdish or guarantee access to Kurdish-language education, Article 3 merely permits its teaching under specified conditions. The decree thus leaves open whether the recognition of Kurdish as a national language will result in substantive language rights or remain primarily symbolic.

The integration agreement of 30 January 2026, accepted by Damascus and the SDF leadership, may provide a basis for addressing some of the described challenges. Article 9 stipulates that the government will take over existing AANES institutions while retaining their employees in their positions. This could allow teachers and educational administrators with experience in Kurdish-language education to remain within the education system. Rather than having to build the necessary human resources for multilingual education from the ground up, the Ministry of Education could draw on existing expertise, thereby reducing some of the logistical and financial challenges involved in its implementation (Bodette 2026a).

The agreement also addresses the future of education more directly. Article 11 recognizes diplomas issued under the AANES Kurdish-language education system, thereby addressing one of the major problems previously faced by its graduates when seeking further education

or employment outside AANES-administered areas. Article 13 commits both parties to further discussions on the future education system for the Kurdish community, leaving the precise form of Kurdish-language education to subsequent negotiations (Bodette 2026b).

The following sections explore what the precise form could look like by examining how other multilingual states have sought to accommodate linguistic diversity and translate language recognition into concrete rights and institutional arrangements.

4. Country Examples

4.1. Canada

Canada has two official languages, English and French, a linguistic duality rooted in the country's historical development and the long-standing presence of French- and English-speaking populations. French and British colonization began in the early seventeenth century, and both groups played a central role in the formation of the Canadian federation (Brosseau and Dewing 2018: 1). At the federal level, English and French enjoy equal official status, while Canada's federal structure leaves provinces and territories considerable scope to develop their own language policies within their areas of jurisdiction (Cardinal and Huron 2022: 6, 10). As a result, language regimes differ substantially across the country. Quebec follows a distinct language regime in which French is the sole official language, whereas New Brunswick recognizes both English and French as official languages. Other provinces have developed varying arrangements for the protection and provision of services to official-language minorities rather than following a uniform federal model (Cardinal and Huron 2022: 6, 10–11).

The adoption of the Canadian Charter of Rights and Freedoms in 1982 significantly strengthened the constitutional protection of Canada's two official languages. The Charter recognizes English and French as the official languages of Canada and establishes their equality of status at the federal level. It also provides constitutional protection for minority-language education across the country. Under Section 23, eligible Canadian citizens belonging to the English- or French-speaking minority of a province have the right to have their children receive primary and secondary education in the minority language. Eligibility is determined by specific criteria, including the language first learned and still understood by the parents, the language in which they received their own primary education in Canada, or the language in which one of their children has already received or is receiving primary or secondary education. These rights are not confined to particular traditional linguistic territories. Their practical implementation, however, is subject to a demographic threshold: publicly funded minority-language instruction must be provided where the number of eligible children is sufficient to warrant it, and where numbers further justify it, this right extends to publicly funded minority-language educational facilities.

In practice, Canada's linguistic arrangements in education have produced different forms of English- and French-language schooling. These include schools in which English is the

language of instruction and French is taught as an additional language, schools in which French is the language of instruction and English is taught as an additional language, as well as immersion programmes. In immersion education, students receive a substantial part of their instruction in their second language. French immersion, for example, enables primarily English-speaking pupils to receive much of their education in French while acquiring the language through its use across different subjects.

One of the central objectives of Canada's official bilingualism has been to establish equality between English and French and to protect official-language minorities, particularly Francophones outside Quebec and Anglophones within Quebec. At the same time, the demographic and social position of the two languages is highly unequal: English is spoken by a much larger share of the Canadian population and exerts considerable economic and cultural influence. Quebec has therefore adopted additional measures aimed at maintaining French as the province's common public language. In education, access to publicly funded English-language schools is restricted by specific eligibility criteria, while French-language schooling constitutes the general rule for children who do not meet these criteria. In other provinces, English-speaking families may generally choose English-language education while French immersion programmes provide an opportunity for children who are not Francophone rights-holders to receive substantial instruction in French.

For the Kurdish case, the Canadian model demonstrates how minority-language education can be protected beyond traditionally defined linguistic territories. If the protection of Kurdish as a national language is taken seriously, Kurdish-speaking families could be granted a right to education with Kurdish as the language of instruction even when they live outside predominantly Kurdish regions. Unlike a strictly territorial model, such a right would follow eligible speakers rather than depend exclusively on their residence within a designated linguistic area. Its implementation could, as in Canada, be linked to a demographic threshold, requiring publicly funded Kurdish-language instruction or educational facilities wherever the number of eligible pupils is sufficient to justify their provision. This could be particularly relevant in Syria, where substantial Kurdish communities live in predominantly Arabic-speaking cities such as Damascus and Aleppo.

At the same time, Quebec illustrates the potential tension between the collective objective of protecting a vulnerable language and individual freedom concerning the language of education. Restricting access to education in a socially dominant language may contribute to preserving a less dominant language and preventing its gradual displacement. A comparable argument could be made for Kurdish in predominantly Kurdish-speaking areas of Syria, such as parts of the Jazira, where unrestricted preference for Arabic-language education could, over time, weaken Kurdish as a language of education and public life. Yet measures designed to protect Kurdish could also limit the choices of Kurdish-speaking families who prefer Arabic-language education because they associate it with broader educational, economic, or social opportunities. Language policy therefore faces the challenge of protecting Kurdish as a language of education and public life while preserving meaningful individual choice regarding the language of instruction. The educational policies implemented under

the AANES provide a relevant case for examining this tension, particularly where Kurdish-speaking families had limited possibilities to choose Arabic as the language of instruction.

4.2. Switzerland

Switzerland officially recognizes four national languages: German, French, Italian, and Romansh. German is by far the most widely spoken, accounting for approximately 62% of the population. French is the main language of almost 23% of residents, while around 8% speak Italian. Romansh represents the smallest of the four national language communities, with roughly 0.5% of the population reporting it as their main language (Belser and Mazidi 2022: 7).

At the federal level, German, French, and Italian have equal status as official languages under Article 70(1) of the Swiss Constitution. They are therefore used by federal institutions in their dealings both with individuals and with other public authorities. Romansh has a more limited status: federal authorities use it officially when communicating with Romansh speakers. Individuals dealing with the federal administration are free to use any of the national languages, regardless of the canton or linguistic region in which they live (Belser and Mazidi 2022: 8).

Language policy at the cantonal level follows a different logic. The cantons themselves determine their official language or languages, and this choice generally also defines the language used by cantonal authorities, public services, and schools. Most cantons have opted for a single official language: 22 of Switzerland's 26 cantons are monolingual. Seventeen of these are German-speaking, four – Geneva, Jura, Neuchâtel, and Vaud – are French-speaking, while Ticino is the only canton with Italian as its sole official language (Belser and Mazidi 2022: 8–9). This territorial approach also shapes public education: residents do not generally have a right to demand schooling in another national language simply because it is one of Switzerland's national languages. Thus, for example, there is no general entitlement to French-language public education in a German-speaking canton, or to German-language public education in a French-speaking canton.

According to Article 70(2) of the Swiss Constitution, cantons that include historically established linguistic minorities within parts of their territory are required to accommodate this diversity and cannot be organized as exclusively monolingual. As a result, three cantons – Bern/Berne, Fribourg/Freiburg, and Valais/Wallis – recognize both German and French as official languages. Graubünden (Grischun/Grigioni) occupies a unique position as Switzerland's only trilingual canton, with German, Italian, and Romansh all enjoying official status (Belser and Mazidi 2022: 9).

Beyond the territorial regulation of official languages, Swiss language policy also includes measures designed to strengthen cooperation between linguistic communities and to support the country's smaller language groups. In line with Article 70(3) of the Swiss Constitution, these measures are intended to foster national cohesion while preserving Switzerland's cul-

tural and linguistic diversity. They include, for example, programmes encouraging student and teacher exchanges, multilingual recruitment practices within the federal administration, and language-related regulations for public broadcasting. In addition, the Confederation provides targeted financial support for the promotion of minority languages. The Canton of Ticino receives around CHF 2.5 million annually to support Italian, while Graubünden receives approximately CHF 5.2 million each year for initiatives such as education, translation, publications, the production of teaching materials, and other language-promotion projects (Belser and Mazidi 2022: 9).

If the Swiss approach to national and official languages were applied to Syria, Kurdish citizens would be entitled to communicate with the central administration in Kurdish, irrespective of their place of residence. At the subnational level, the territorial principle would require areas with substantial and traditionally established Kurdish communities to take their linguistic presence into account when determining their official languages. On this basis, both Hasakah and Aleppo governorates could be expected to recognize Arabic and Kurdish, at least in those parts of their territory where Kurdish communities have historically been concentrated. In Aleppo Governorate, this would be particularly relevant to the districts of Kobanî and ‘Afrin, both of which have historically had substantial Kurdish populations. In Hasakah Governorate, the districts of Qamishli Ras al-‘Ayn /Serê Kaniyê, and Malikiyah/Dêrik have traditionally been home to large Kurdish communities, in some areas possibly constituting a majority. Applying such a model in Syria, however, would inevitably raise questions about how terms such as “significant linguistic minority” and “traditional settlement area” should be defined and which territorial and demographic criteria should determine the recognition of Kurdish as an official language.

A major limitation of Switzerland’s territorial approach becomes apparent when members of linguistic minorities move beyond their traditional areas of settlement. Whereas most German- and French-speakers still live within their respective linguistic regions, a substantial proportion of Italian- and Romansh-speakers now reside elsewhere, particularly in urban centres such as Basel, Bern, Geneva, Lausanne, and Zurich. Outside their traditional linguistic territories, their languages may not have official status at the cantonal or local level, limiting their ability to use them when dealing with public authorities or accessing public services. This may contribute to the gradual weakening of their linguistic and cultural identities (Belser and Mazidi 2022: 10). This issue is particularly relevant to Syria, where many Kurds have settled outside the predominantly Kurdish regions, including in major cities such as Damascus and Aleppo, as well as Homs and Hama. A strictly territorial model would therefore leave Kurdish speakers in these areas without a general entitlement to use Kurdish in their dealings with public authorities or to receive public services in Kurdish.

A further challenge to Switzerland’s multilingual framework arises from the increasing importance of English in education. Traditionally, foreign-language teaching in the cantons placed particular emphasis on Switzerland’s national languages. As English has gained importance, however, the question of which language pupils should learn first has become increasingly contested. In particular, several German-speaking cantons have debated whether English

should take priority over French as the first foreign language taught at school, raising broader concerns about the role of national languages in maintaining communication and cohesion across linguistic regions (Belser and Mazidi 2022: 16). A comparable tension may arise in Syria. Arabic-speaking families are likely to favour English over Kurdish as a foreign language, particularly where English is perceived as offering greater educational and professional opportunities. This hierarchy is already reflected in Presidential Decree No. 13 of 2026, under which English, as a compulsory foreign language, has a more firmly established position in the curriculum than Kurdish, which is offered as an elective language.

Last but not least, the Swiss case illustrates the importance of financial support for the implementation of a multilingual language policy. Cantons receive federal funding for measures aimed at promoting linguistic and cultural diversity, particularly the protection and promotion of smaller national language communities. In Syria, however, the financial conditions for comparable measures are far less favourable. With a large majority of the population living below the poverty line and large parts of the country's infrastructure requiring reconstruction, substantial public funding for the promotion of linguistic diversity is unlikely to be available in the near future.

4.3. Belgium

Belgium's population of approximately 11.5 million is commonly divided into three principal linguistic groups: Dutch-, French-, and German-speakers. Somewhat fewer than seven million Dutch-speakers live predominantly in the Flemish Region in the north, while a smaller Dutch-speaking population resides in Brussels. Slightly more than four million French-speakers are concentrated in the Walloon Region and in Brussels, where French is the predominant language. The German-speaking community is considerably smaller, numbering around 76,000 people and concentrated in a limited area in eastern Belgium within the Walloon Region. These figures are approximate, however, particularly in the case of Brussels, as Belgium does not conduct a language census and a growing share of the population is multilingual or speaks another language as its mother tongue (Van Drooghenbroeck and Popelier 2022: 6).

Belgium's federal structure reflects both linguistic-cultural and territorial-economic demands. The Flemish movement's pursuit of greater recognition and protection of Flemish language and culture contributed to the creation of linguistic Communities, while demands in Wallonia for greater control over economic policy led to the establishment of territorial Regions. Under the current constitutional framework, Belgium has three Communities – the Flemish, French, and German-speaking Communities – which exercise powers in areas closely connected to language and personal identity, including culture and education, as well as health care, youth protection, and social assistance. Alongside them are three territorial entities – the Flemish Region, the Walloon Region, and the Brussels-Capital Region – whose responsibilities include economic policy, environmental matters, spatial planning, housing, and industry (Van Drooghenbroeck and Popelier 2022: 6–7). Belgium thus combines territorial and group/language rights or federal-territorial principles with cultural autonomy.

Like Switzerland, Belgium relies heavily on the principle of territoriality in regulating the use of languages by public authorities. Each of the country's monolingual linguistic regions has one official language for administrative purposes: Dutch in the Dutch-speaking region, French in the French-speaking region, and German in the German-speaking region. As a general rule, public authorities operate in the official language of the respective linguistic region and are not required to provide services in other languages simply because speakers of those languages reside there. Brussels-Capital constitutes the main exception to this territorial monolingualism. As a bilingual linguistic region, its public administration operates in both Dutch and French, allowing citizens to communicate with public authorities in either language. The bilingual regime also extends to official communication and public services. Although French is predominant among the population of Brussels, the equal institutional status of Dutch ensures the protection of the Dutch-speaking linguistic community. A further exception applies in certain municipalities, particularly along linguistic borders, where special "language facilities" allow residents to communicate with the authorities and receive certain services in a national language other than the official language of the region (Van Drooghenbroeck and Popelier 2022: 6–10). These facilities do not replace the territorial principle but constitute specific exceptions to it. Their scope and application have repeatedly been the subject of political and legal disputes, particularly between Dutch- and French-speaking political actors.

Education, which falls within the competences of the linguistic Communities, broadly follows the country's territorial language arrangements, with the language of instruction generally determined by the linguistic area in which a school is located. The teaching of additional languages, however, differs considerably between the Communities. Learning a second national language is compulsory in Flanders and Brussels, whereas in the French-speaking Walloon Region students may choose between English, German, and Dutch as a second language in secondary education. According to the latest statistics cited by Van Drooghenbroeck and Popelier, only 15% of Walloon pupils chose Dutch in 2020, and this proportion was declining (Van Drooghenbroeck and Popelier 2022: 13). In Brussels, education is largely organised into separate French- and Dutch-medium systems, and parents are in principle free to choose the school in which they enrol their children (Van Mensel 2016: 195).

The Belgian case raises the question of when and how a second national language should be introduced in the education system. In the Syrian context, one option could be to teach Kurdish as the first additional national language to Arabic-speaking pupils in areas with substantial Kurdish-speaking populations. In districts where both language communities are traditionally present, schools could offer classes in which Kurdish is the language of instruction and Arabic is taught as a second national language, alongside classes in which Arabic is the language of instruction and Kurdish is taught as the second national language. The objective would therefore be twofold: to enable children to receive education in their first language while ensuring that both Kurdish- and Arabic-speaking pupils acquire the other national language. Such an arrangement could promote linguistic integration in both directions rather than placing the responsibility for linguistic adaptation exclusively on Kurdish speakers. Although Arabic speakers constitute the national majority, they form a minority in some predominantly Kurdish districts. In these areas, knowledge of Kurdish could facilitate

communication across linguistic communities, participation in local public life, and broader social cohesion.

4.4. South Africa

Language remains a politically sensitive issue in South Africa, not least because of its historical use as an instrument of domination and exclusion. Under British imperial rule, the growing dominance of English was strongly resisted by Afrikaners, while during apartheid Afrikaans became closely associated with the oppression and marginalization of the Black population. Contemporary language debates have shifted towards questions of decolonization and the Africanization of education, including efforts to strengthen the visibility and role of indigenous African languages in curricula and educational institutions. At the same time, parts of the Afrikaans-speaking community are increasingly concerned about the declining position of Afrikaans, particularly in education and employment. Despite these competing pressures, English has retained its dominant and largely uncontested position as the country's lingua franca (Maziwisa 2022: 6).

The transition from apartheid to democracy fundamentally changed the constitutional status of languages in South Africa. The Interim Constitution of 1993 recognized eleven official languages, including indigenous African languages for the first time at the national level. It also protected the right of individuals to use the language of their choice and participate in the cultural life of their choice. In public administration, individuals could be addressed in their preferred language where this was practicable, taking into account factors such as language usage, practicality, and cost (Maziwisa 2022: 10). The 1996 Constitution retained the recognition of eleven official languages: Afrikaans, English, isiNdebele, isiXhosa, isiZulu, Sepedi, Sesotho, Setswana, siSwati, Tshivenda, and Xitsonga (Maziwisa 2022: 11). Despite this formal multilingualism, no single language is spoken by a majority of the population at the national level; according to the 2011 census data cited by Maziwisa, isiZulu was the most widely spoken first language, at 22.7 percent (Maziwisa 2022: 6–8). While the constitutional framework envisages what Maziwisa describes as “parity of esteem” among the official languages, achieving such equality in practice is constrained by factors such as practicality and cost. English consequently retains a dominant position as the lingua franca of government administration, including internal and external communication, while indigenous languages are more commonly used in informal interactions with the public, such as telephone calls and front-desk enquiries (Maziwisa 2022: 12, 15).

South Africa has a decentralized system of government comprising the national government, nine provinces, and 257 municipalities. Although it is not formally classified as a federal state, its constitutional structure incorporates important federal features, including constitutionally protected powers for provincial and local governments. In several policy areas, including agriculture, education, health services, housing, and social welfare, legislative responsibilities are shared between the national and provincial levels, while the national government retains the power to establish uniform standards and frameworks where necessary. Municipalities are primarily responsible for local governance and the provision of basic

services. Language policy likewise combines national principles with considerable scope for subnational implementation. Provincial governments may determine the official languages used for governmental purposes within their territories, but must take into account factors such as language usage, practicality, cost, regional circumstances, and the needs and preferences of the population. The Constitution requires both the national government and provincial governments to use at least two official languages. In practice, most provinces use English alongside one or more regionally important languages, with Afrikaans also playing an important role in several provinces (Maziwisa 2022: 11–13).

Responsibility for language policy in education is shared between different levels of governance. The national government establishes the general legal and policy framework, while provincial authorities are responsible for implementing education policy and ensuring compliance with national standards and requirements. At the level of individual public schools, School Governing Bodies (SGBs), which include representatives of parents, educators, and other members of the school community, play an important role in determining the school's language policy. Under Section 6(2) of the South African Schools Act, the governing body of a public school may determine the language policy of the school, subject to the Constitution, the Act, and applicable provincial law. This decentralized arrangement gives local school communities considerable influence over the language or languages used for instruction and can therefore contribute to the maintenance and promotion of locally important languages. At the same time, this autonomy operates within a national and provincial regulatory framework and is not absolute (Maziwisa 2022: 16–17).

In 1997, the national Minister of Education adopted South Africa's first Language in Education Policy (LiEP), which promotes equal treatment of the official languages and an approach of additive multilingualism. Under this framework, learners study one language during grades 1 and 2 and add a second official language from grade 3 onwards. Schools are also expected to promote multilingualism by using more than one language of learning and teaching or by offering additional languages as subjects (Maziwisa 2022: 16). The Constitution provides everyone with the right to receive education in the official language or languages of their choice in public educational institutions where this is "reasonably practicable". In practice, however, this right is constrained by factors such as the availability of teachers and teaching materials, as well as financial and practical considerations. Learners whose first language is an indigenous African language generally begin their education in that language but subsequently shift to English or Afrikaans as the language of instruction, while their first language continues primarily as a subject. English- and Afrikaans-speaking learners therefore have an important advantage, as they may continue to receive instruction in their first language throughout their education (Maziwisa 2022: 16–17). At the same time, English has become increasingly attractive to families because of its perceived advantages for higher education, employment, and participation in the global economy. This preference reinforces the position of English while weakening efforts to expand the use of indigenous African languages in education. In 2022, the Minister of Basic Education, Angie Motshekga, noted that more than 80 percent of learners were being taught in a language other than their mother tongue. In response to these challenges, the government has sought both to expand the range of lan-

guages taught in schools and to extend mother-tongue instruction beyond the early grades (Maziwisa 2022: 16–17).

The South African experience is particularly relevant to Syria because it demonstrates that language policy need not be limited to accommodating the country's largest linguistic groups. Alongside Arabic and Kurdish, Syria is home to smaller linguistic communities speaking languages such as Assyrian/Neo-Aramaic, Armenian, and Turkmen/Turkish. A future language policy should therefore consider not only the relationship between Arabic and Kurdish but also the recognition and protection of these smaller languages. The South African model illustrates how a state can recognize a broad range of languages while allowing their practical use to vary according to demographic and regional circumstances. For Syria, such an approach could provide a framework for protecting smaller linguistic communities without requiring all recognized languages to be used to the same extent throughout the country.

A second lesson concerns the decentralization of language policy. South Africa combines a national framework with considerable scope for regional and local adaptation. A similar approach could be relevant to Syria, particularly in linguistically diverse areas: national legislation could establish basic language rights and common standards, while regional and local authorities and school communities could adapt their implementation to local linguistic conditions.

Finally, South Africa demonstrates that constitutional recognition alone does not ensure substantive linguistic equality. Although eleven languages enjoy official status, English continues to dominate important areas of public administration and education. Practical constraints, including the availability of qualified teachers, teaching materials, and financial resources, can undermine efforts to strengthen less dominant languages. This is an important consideration for Syria. Recognizing Kurdish and other minority languages, or formally establishing a right to education in these languages, would have limited effect unless accompanied by the resources necessary for implementation. At the same time, language policy would have to address the possibility that families themselves may prefer Arabic or English because they associate these languages with greater educational, economic, or social opportunities. The challenge is therefore not only to grant linguistic rights, but to create the conditions under which minority languages can remain viable languages of education, administration, and public life without unnecessarily restricting individual language choices.

4.5. South Tyrol

Until the end of the First World War, South Tyrol formed part of the Austro-Hungarian Empire. Following the collapse of the empire, the region was transferred to Italy in 1919 without consulting the local population. Under Mussolini's fascist regime, the predominantly German-speaking population was subjected to an extensive policy of forced Italianization. The use of German was severely restricted, German place names were replaced by Italian ones, and the

settlement of Italian speakers in South Tyrol was actively promoted. During the Second World War, Hitler and Mussolini introduced the so-called “Option”, under which German-speaking South Tyroleans had to choose between leaving the region for Nazi Germany or remaining in Italy under conditions that implied further assimilation.

After the Second World War, the protection of South Tyrol’s German-speaking population became the subject of a bilateral agreement between Austria and Italy. The 1946 Paris Agreement established minority protection guarantees and gave Austria a role as a protecting power. It also provided the basis for the First Statute of Autonomy, marking the beginning of an institutional framework for the protection of South Tyrol’s German-speaking population (European Center for Kurdish Studies August 2023).

Today, South Tyrol’s political system functions according to a logic of separation and forced cooperation between the German- and Italian-speaking communities, with specific arrangements for the Ladin-speaking minority. The system relies on declarations of belonging to or affiliation with one of the three recognized language groups – German, Italian, or Ladin – which are used, among other purposes, to determine proportional representation in the public sector. German and Italian enjoy equal status in relations with public authorities, the administration, and the judiciary, as well as with private entities providing public services. Civil servants are generally required to demonstrate proficiency in both German and Italian, while knowledge of Ladin is additionally required for certain positions in Ladin-speaking areas. Power-sharing mechanisms also extend to political representation: the composition of the regional government of the region South Tyrol/Trentino must reflect the proportional representation of the German- and Italian-speaking groups in the regional parliament (Alber 2022: 14–15).

An important feature of the South Tyrolean system is that these language rights are not limited to formal recognition but are supported by institutional mechanisms designed to ensure their implementation. Individuals and linguistic groups can rely on legal remedies when their language rights are violated, while public institutions are required to provide the structures and linguistic capacities necessary to implement these rights in practice. The system was developed gradually over several decades, with the implementation of the Second Statute of Autonomy extending from 1972 to 1992 (Alber 2022: 15).

In education, parents are generally free to choose whether their children attend a German- or Italian-language school. However, this freedom of choice is subject to language requirements: pupils whose proficiency in the school’s language of instruction is insufficient for successful participation in lessons may be excluded from that school (Center for Autonomy Experience, n.d.). The German- and Italian-speaking communities maintain separate education systems from pre-school through secondary education, providing instruction primarily in the respective mother tongue. In German-language schools, Italian is taught as a compulsory second language, while German is taught as a compulsory second language in Italian-language schools. This system ensures that pupils learn both of South Tyrol’s main

languages, although levels of proficiency in the respective second language vary considerably (Alber 2022: 22–23).

Ladin schools follow a different model. German and Italian are used equally as languages of instruction, while Ladin is also taught and used within the multilingual school system (Alber 2022: 22–23). Together with the teaching of English, this approach means that many pupils in Ladin-speaking areas acquire proficiency in four languages – Ladin, German, Italian, and English. Higher education follows yet another multilingual model: South Tyrol's university system uses German, Italian, and English (European Center for Kurdish Studies August 2023).

The South Tyrolean model is particularly relevant when considering language policy in areas of Syria with a Kurdish majority and the relationship between Kurdish- and Arabic-speaking communities in such a setting. Its differentiated approach to smaller linguistic minorities may also offer useful lessons for the protection of languages such as Assyrian. Similar to the arrangements for Ladin speakers, Assyrian could be taught in public schools in areas with significant Assyrian communities, while existing private Assyrian schools, which already operated under Ba'ath rule and use Assyrian as a language of instruction, could continue to provide mother-tongue education. At the same time, the South Tyrolean model is strongly territorial and therefore offers fewer answers to the question of how Kurdish language rights could be protected in predominantly Arab areas or cities where Kurds constitute a dispersed minority.

The South Tyrolean system also illustrates the risks of organizing language rights around clearly defined linguistic groups. The system requires individuals to associate themselves with one of the recognized language groups for purposes such as proportional representation in public institutions and, more broadly, structures education around separate linguistic communities. Such an approach leaves limited space for bilingual individuals, mixed families, or people who do not wish to define themselves through a single linguistic identity. The protection of linguistic communities through specific collective rights should therefore not result in the exclusion or disadvantage of individuals who do not identify with any one group according to predetermined linguistic or ethnic categories (European center for Kurdish Studies October 2024). A future language regime in Syria should avoid rigid linguistic classifications and instead recognize bilingualism and multilingualism as realities that deserve protection in their own right.

Another important lesson from South Tyrol concerns the implementation of language rights. Effective language protection requires not only the recognition of languages and linguistic rights, but also clear institutional responsibilities, practical mechanisms for implementation, and procedures through which individuals and communities can claim these rights if they are not respected. This is particularly relevant for Syria, where Decree No. 13 recognizes Kurdish as a national language but remains vague about the concrete rights arising from this status and their implementation. A future language regime would therefore need to translate this recognition into clearly defined and enforceable rights and assign responsibility for their implementation to specific institutions.

4.6. India

India's immense cultural and linguistic diversity makes the country a particularly complex and relevant example of the relationship between language policy and federalism. India is a federal union composed of states and union territories, with powers divided between the Union and state governments. An important feature of this system is the considerable role of language at the subnational level: under Article 345 of the Constitution, states may adopt one or more languages used within their territory as official languages. The territorial organization of the federation itself also reflects linguistic diversity, as state boundaries were substantially reorganized in 1956, primarily on the basis of linguistic and geographical considerations (Sarangi & Sharma 2022: 5). According to the 2011 census, 121 languages are spoken in India. Within this highly diverse linguistic landscape, the central government distinguishes between three broad categories: official, scheduled, and classical languages (Sarangi & Sharma 2022: 5–8).

When the Indian Constitution came into force in 1950, Hindi in the Devanagari script was designated as the official language of the Union, while English was to continue to be used for official purposes for a transitional period of fifteen years. The prospect of replacing English with Hindi after this period contributed to widespread protests, particularly in non-Hindi-speaking parts of India, in the early 1960s. In response, English was retained alongside Hindi for official purposes and for communication between the central government and states in which Hindi was not spoken (Sarangi & Sharma, 2022: 6).

A further category is that of “scheduled languages”, referring to the languages listed in the Eighth Schedule of the Indian Constitution. At present, the Schedule includes 22 languages. Although they are often perceived as official languages of India, the Constitution does not formally designate them as such. Sarangi and Sharma (2022: 6) therefore describe them as languages that “could be viewed as associate or additional official languages”. Inclusion in the Eighth Schedule nevertheless provides a language and its speakers with formal constitutional recognition and enhances its status in areas such as administration, education, and public life.

The Eighth Schedule has evolved over time: while it initially included 14 languages in 1950, subsequent constitutional amendments increased their number to 22. Demands for further inclusion continue, and Members of Parliament may raise proposals for the inclusion of additional languages. The prestige associated with scheduled status has thus generated competition among language communities for constitutional recognition (Sarangi & Sharma, 2022: 6–8).

Alongside the scheduled languages, India has established a separate category of “classical languages”. This status is based primarily on a language's historical depth, ancient literary heritage, and independent literary tradition. It provides additional cultural prestige as well as access to state support and funding. Sarangi and Sharma (2022: 8–9) note that, as further language communities seek inclusion in the Eighth Schedule, speakers of already schedu-

led languages have increasingly sought the additional distinction associated with classical-language status.

Furthermore, the Indian Constitution contains specific provisions for linguistic minorities. Article 350A requires states and local authorities to endeavour to provide adequate facilities for mother-tongue instruction at the primary level for children belonging to linguistic minority groups. Article 350B provides for a Special Officer for Linguistic Minorities, appointed by the President, who investigates the implementation of constitutional safeguards for linguistic minorities (Sarangi & Sharma, 2022: 10).

Another central element of India's language policy in education is the "three-language formula" (TLF), introduced through the National Policy on Education in 1968. It envisaged the teaching of Hindi, English, and a modern Indian language, preferably a Southern Indian language, in Hindi-speaking states, while students in non-Hindi-speaking states were to study Hindi, English, and the respective regional language. The formula was retained in subsequent education policies, including the National Education Policy (NEP) of 2020. However, the requirement that Hindi be taught to every student across India was dropped in 2020 (Sarangi & Sharma, 2022: 12).

With regard to the language of instruction, the NEP 2020 recommends that, wherever possible, the home language, mother tongue, local language, or regional language should be used as the language of instruction until at least Grade 5, and preferably until Grade 8 and beyond. This approach of "mother-tongue based multilingual education" also encourages bilingual teaching and learning materials for students whose home language differs from the language of instruction. In addition, the NEP promotes the development of resources for official, scheduled, dominant regional, and minority languages, including digital translation, textbooks, and the recruitment of teachers for mother tongues and classical languages (Sarangi & Sharma, 2022: 12).

Even though the Indian Constitution requires states to provide facilities for education in the mother tongues of linguistic minorities, three main problems remain. First, states tend to promote dominant regional languages rather than minority languages in education. These dominant languages are generally recognized as official languages at the state level and/or as scheduled languages under the Eighth Schedule. Second, the "three-language formula" (TLF) has not been implemented uniformly across India. Some predominantly Hindi-speaking states offer Sanskrit as the third language instead of another modern regional Indian language, thereby undermining the original aim of the TLF to promote national integration. Third, English continues to occupy a dominant position in the educational sector and is increasingly used as a language of instruction.

The role of English in education remains contested. While earlier scholarship associated English with linguistic imperialism, more recent approaches have emphasized its potential to facilitate social mobility and have therefore interpreted it as a possible tool of decolonization. This debate is reflected in contrasting positions on language education in India: some scho-

lars advocate English-language education, particularly for Dalits, as a means of overcoming caste-based discrimination, while others emphasize the need to promote minority languages and mother-tongue education in order to prevent the loss of linguistic and cultural identity (Sarangi & Sharma, 2022: 12–13).

The challenges resulting from the exceptionally high number of languages spoken in India are not directly comparable to the situation in Syria. One potentially relevant feature for Syria is India's continued use of English, a language inherited from the colonial period, for official purposes and communication between different levels of government. However, the linguistic situation in Syria differs substantially. Unlike Hindi in India, Arabic is spoken by the large majority of Syrians, including many members of linguistic minorities such as Kurds and Assyrians. At the same time, proficiency in English at a level that would allow citizens to communicate with state authorities is far less widespread in Syria than in India. The Indian model therefore offers no directly transferable model for Syria. Nevertheless, its constitutional provisions for linguistic minorities and its emphasis on mother-tongue education illustrate possible mechanisms for accommodating linguistic diversity, even though their implementation in India remains inconsistent. Most importantly, the Indian example demonstrates that the use of a common language for communication across the country does not necessarily conflict with providing education in minority languages. Applied to Syria, the dominant role of Arabic as a common language would therefore not preclude the use of Kurdish or other minority languages as languages of instruction.

4.7. Spain

Another insightful example of how territorial autonomy and a well-adapted education system can protect language rights within a multilingual state is Spain. The protection of linguistic diversity is rooted in the Spanish Constitution of 1978, which established Castilian as the official language throughout the country while allowing other Spanish languages to acquire official status in the Autonomous Communities (ACs) in which they are spoken. The specific arrangements governing these languages are determined by the respective Statutes of Autonomy (SAs). As a result, several Autonomous Communities have established both Castilian and a regional language as co-official languages within their territories (López Castillo & López-Basaguren, 2022: 6, 10–11).

The territorial distribution of languages in Spain does not always correspond neatly to the boundaries of the Autonomous Communities (López Castillo & López-Basaguren, 2022: 6–9). Catalan, for example, is spoken in Catalonia, the Valencian Community – where it is officially referred to as Valencian – and the Balearic Islands, while Basque is spoken in the Basque Country and parts of Navarra, and Galician primarily in Galicia. In general, these languages have official status alongside Castilian in the respective Autonomous Communities, although the territorial scope and degree of recognition vary. Navarra provides a particularly interesting example of such differentiation: Basque is fully official in the Basque-speaking zone in the north, whereas in the mixed zone, including Pamplona/Iruña and its surroundings, it has

a special status as a protected language without being fully official. Nevertheless, Basque is widely available there both as a subject and as a language of instruction in compulsory education (López Castillo & López-Basaguren, 2022: 6–8).

The recognition of regional languages as co-official languages also extends to public administration. In Autonomous Communities with an official language other than Castilian, citizens can use either official language in their interactions with public authorities. Knowledge of both official languages is therefore required for civil service positions, although the extent of this requirement varies between Autonomous Communities. In Catalonia, knowledge of both languages is required throughout the civil service, whereas in the Basque Country the requirement applies to particular positions according to the proportion of regional-language speakers (López Castillo & López-Basaguren, 2022: 11–12).

Language policies in education vary considerably between the Autonomous Communities. In the Basque Country and in the Basque-speaking and mixed zones of Navarra, three different education models have been established: (1) education in Basque, (2) education in Castilian, and (3) bilingual education in which both languages are used as languages of instruction. Families can choose between these models. Over time, the Basque-language model has become particularly popular, especially in public education (López Castillo & López-Basaguren, 2022: 11–12).

Catalonia has followed a different approach. Since the adoption of the Catalan Education Law in 2009, Catalan has been established as the language of instruction, with Castilian taught as a subject. This model has become politically and legally contested, particularly because of the exclusion of Castilian as a language of instruction. Some families demanded that Castilian also be used for teaching certain subjects, and the resulting disputes reached the courts. In 2015, the High Court of Justice of Catalonia ruled that Castilian could not be excluded as a language of instruction against the wishes of parents. The controversy continued in subsequent years and has also been shaped by changing political majorities at the Catalan and national levels (López Castillo & López-Basaguren, 2022: 12–15).

In Galicia, the Balearic Islands, and the Valencian Community, compulsory bilingual models have been adopted in which both official languages are used as languages of instruction. According to López Castillo and López-Basaguren (2022: 12, 15), these models do not guarantee the possibility of receiving education entirely in the respective minority language, despite Spain's commitments under the European Charter for Regional or Minority Languages. In some cases, the introduction of English as an additional language of instruction has further complicated this arrangement. In Galicia, for example, a trilingual model uses Castilian, Galician, and English in similar proportions, further limiting the proportion of education provided in the minority language (López Castillo & López-Basaguren, 2022: 15).

With regard to Syria, the Spanish case is particularly interesting because it illustrates how different language models can coexist within a single state and be adapted to regional circumstances. Rather than applying one uniform model throughout the country, different

arrangements can reflect the linguistic composition, historical background, and preferences of individual regions. Such an asymmetric approach could also be relevant for Syria. While Arabic is clearly dominant in most parts of the country and there may be little need for alternative language models there, different arrangements could be considered in areas with substantial Kurdish populations and, in particular, in linguistically mixed areas. This would allow language policy to respond to local conditions without requiring the introduction of multiple language models throughout the country.

The system in Navarra and the Basque Country, with different language options in education, has the advantage of allowing students and their parents to choose their preferred language of instruction. Thus, no one is required to accept a language of instruction they do not want. However, choice alone does not necessarily guarantee the protection of a minority language. Depending on parents' preferences, one language may come to dominate at the expense of another. If, for example, most parents in a potential Kurdish region of Syria were to opt for Arabic as the language of instruction, special measures might be necessary to ensure the protection and continued use of Kurdish in education.

At the same time, the Catalan case demonstrates that strong regional protection of a minority language may itself become contested if speakers of the state-wide majority language perceive their linguistic choices as being restricted. For Syria, this suggests that measures aimed at strengthening Kurdish should be balanced with the linguistic rights of Arabic-speaking populations, particularly in linguistically mixed areas. The objective should therefore be to provide effective protection for Kurdish without unnecessarily restricting access to Arabic.

4.8. Kurdistan Iraq

Following the 1991 uprising against the Ba'ath regime in Iraq, Kurdish political parties established an autonomous regional administration with its own parliament and a council of ministers in July 1992. The Kurdistan Regional Government (KRG) subsequently promoted Kurdish as the main language of the region, while Arabic and English continued to serve as languages of external communication. By 2000, the number of schoolchildren studying in Kurdish at educational institutions in the region had outnumbered those studying in Arabic (Salih & Ahmed, 2019: 10).

However, the linguistic situation in the Kurdistan Region is complicated by the fact that several distinct Kurdish varieties are spoken there. Before 1991, Kurdish varieties were subjected to repression under the Ba'ath regime. After 1991, and particularly after 2003, internal differences between speakers of different Kurdish varieties became more visible. Sorani has traditionally been the predominant variety in the Kurdistan Region and has been widely used in both public and private domains, except in Duhok province, where Badini, a variety of Kurmanji, predominates (Salih & Ahmed, 2019: 14). The civil war between the Kurdistan Democratic Party (KDP) and the Patriotic Union of Kurdistan (PUK) in the 1990s resulted in the establishment of two separate administrations: one governed by the KDP in Duhok and Erbil and the other by

the PUK in Sulaimaniyah and Garmiyan. Against this background, the Duhok Directorate of Education requested that Sorani be replaced by Badini in the school curriculum. The KDP-led administration agreed and supported the introduction of Badini as the language of instruction in Duhok. After 2003, Badini became the language of instruction for grades one to six (Salih & Ahmed, 2019: 17).

After the fall of Saddam Hussein's Ba'athist regime in 2003, Kurdish was formally recognized alongside Arabic as an official language in the 2005 Iraqi Constitution. Article 4(1) states:

"The Arabic language and the Kurdish language are the two official languages of Iraq. The right of Iraqis to educate their children in their mother tongue, such as Turkmen, Assyrian, and Armenian shall be guaranteed in government educational institutions in accordance with educational guidelines, or in any other language in private educational institutions."

The Constitution further specifies what this bilingual status entails: Arabic and Kurdish are to be used in the Official Gazette, parliament, government, courts and official conferences, as well as for official documents and correspondence. Both languages are also to be reflected in education and in state instruments such as banknotes, passports and stamps. Federal and official institutions in the Kurdistan Region are required to use both languages. At the same time, Turkmen and Syriac are recognized as official languages in administrative units where their speakers constitute a significant share of the population, while regions and governorates may adopt additional local languages as official languages if approved by a majority in a referendum [Constitution of Iraq, 2005, Art. 4(2) to 4(5)].

Thus, on paper, Iraq has a bilingual Arabic-Kurdish framework at the federal level, which also extends to federal and official institutions in the Kurdistan Region, while the Constitution provides additional protection for other languages. In practice, however, language policy in the Kurdistan Region has placed a strong emphasis on the promotion of Kurdish – or, more precisely, its different varieties. At the same time, the absence of a single Kurdish standard officially imposed throughout the region has coincided with the growing importance of English. In 2015, a group of parliamentarians submitted a proposal to the KRG's Constitutional Committee to recognize English as one of the official languages of the Kurdistan Region (Salih & Ahmed, 2019: 19–20).

This development has also affected the position of Arabic in education. While Arabic remains constitutionally one of Iraq's two official languages, English increasingly gained importance in the Kurdistan Region, while the role of Arabic in Kurdish education declined. According to Keil and McCulloch (2026), this contributed to a situation in which a generation of Kurdish students acquired insufficient proficiency in Arabic to pursue higher education in Baghdad or other Arabic-speaking countries. More recently, however, the KRG has changed its approach, and Arabic is once again being taught in primary education (Keil & McCulloch, 2026).

A gap between constitutional provisions and their implementation can also be observed with regard to minority languages. Although the Constitution explicitly protects mother-ton-

gue education and recognizes Turkmen and Syriac as official languages in administrative units where their speakers constitute a significant share of the population, their practical use remains considerably more limited. According to Keil and McCulloch (2026), Assyrian/Syriac and Turkmen are used as languages of instruction primarily in community schools organised by religious, cultural, and political organisations associated with the respective minorities.

The promotion of Badini in Duhok did not result in the adoption of a single standardized Kurdish language throughout the Kurdistan Region. Instead, Sorani and Badini/Kurmanji developed as two parallel standard varieties, with the KRG promoting both rather than declaring one of them the sole official standard. Attempts to resolve the issue have repeatedly generated controversy. In 2006, a group of Hawrami speakers petitioned the Kurdistan Parliament for linguistic rights and recognition of Hawrami as a minority language. In response, a group of prominent Sorani-speaking intellectuals demanded that Sorani be declared the standard and official language of the Kurdistan Region. The Kurdish Academy subsequently discussed different approaches to standardization, including the proposal to regard Kurdish as a “bi-standard language”, but no consensus on a single standard was reached. In practice, the KRG has continued to promote both Sorani and Badini/Kurmanji as standard varieties (Salih & Ahmed, 2019: 14–16, 24).

The Kurdistan Region of Iraq thus provides less of a model to follow than an example of some of the problems that should be avoided in a potential predominantly Kurdish region in Syria. Most importantly, the Iraqi case demonstrates the limitations of bilingualism that exists primarily on paper. While Arabic and Kurdish formally enjoy equal status, the strong emphasis on Kurdish in the Kurdistan Region has contributed to a decline in Arabic proficiency among younger generations. Similar problems have emerged under the AANES, as discussed above. The Iraqi case also illustrates that constitutional recognition alone does not guarantee the effective protection of smaller minority languages. For Syria, this underlines the importance of ensuring that both Kurdish and Arabic remain effectively accessible in education and public life, while linguistic rights granted to smaller minorities are implemented in practice rather than merely formally. In one respect, however, the situation in Syria is less complex than in Iraqi Kurdistan: Kurmanji is the Kurdish variety spoken in Syria, so the question of competing Kurdish standard varieties does not arise in the same way.

5. Conclusion

Inspired by Presidential Decree No. 13, which recognizes Kurdish as a national language and permits its teaching in Syria under certain conditions, this paper examined the language policies of a number of multilingual states. The aim was not to develop a finished model for integrating Kurdish into Syria’s education system, but rather to identify principles, mechanisms, and potential problems that should be taken into account when such a system is developed. The comparative cases demonstrate that there is no single model that could simply be transferred to Syria. Instead, different approaches offer different solutions to questions of territorial autonomy, individual language rights, language choice in education, minority pro-

tection, and the relationship between national and regional languages.

A future language policy for Syria would first have to distinguish between two different situations. The first concerns predominantly Kurdish areas, where the central question is how Kurdish and Arabic – alongside smaller minority languages where relevant – should be integrated into education and potentially public administration. The second concerns Kurdish speakers living outside these areas, particularly in predominantly Arabic-speaking cities and regions. Territorial language rights alone cannot adequately address both situations. A future system may therefore need to combine territorial arrangements in predominantly Kurdish areas with individual language rights for Kurdish speakers elsewhere.

For predominantly Kurdish areas, the Basque model offers one possible point of reference. Allowing families to choose between education with Kurdish as the language of instruction, education with Arabic as the language of instruction, and bilingual education could reconcile the protection of Kurdish with individual choice and the linguistic rights of Arabic speakers. However, the experience of both the Basque Country and Quebec suggests that freedom of choice alone does not necessarily protect the less dominant language. If a large proportion of Kurdish families were to choose Arabic because of its wider educational, economic, or social utility, additional measures might be necessary to ensure that Kurdish remains a viable language of education and public life. Conversely, the Catalan and AANES experiences demonstrate the problems that may arise when the promotion of a regional language excessively restricts access to education in the state-wide majority language. The challenge would therefore be to protect Kurdish without reproducing linguistic exclusion in the opposite direction.

Regardless of the language of instruction chosen, Arabic should retain a strong position throughout the education system. Kurdish-speaking pupils receiving their education primarily in Kurdish should begin learning Arabic as a second national language at an early stage and continue doing so throughout their schooling. Arabic is not only the language spoken by the majority of Syria's population but also the principal common language through which citizens from different regions and linguistic communities can communicate. Maintaining a high level of Arabic proficiency is therefore important for social cohesion as well as for access to higher education, employment, and mobility throughout the country.

Whether the principle should operate equally in the opposite direction requires further consideration. In predominantly Kurdish or linguistically mixed areas, there is a strong case for Arabic-speaking pupils to learn Kurdish as a second national language from an early stage. This would make linguistic integration a reciprocal process rather than placing the burden of bilingualism exclusively on Kurdish speakers. The Belgian experience illustrates the consequences that can arise when knowledge of another national language develops unevenly between linguistic communities. At the same time, requiring Kurdish throughout Arabic-speaking Syria would be difficult to justify where there is little everyday need for the language. An asymmetric system adapted to regional circumstances, as illustrated particularly by Spain, may therefore be more appropriate than a uniform nationwide model.

The territorial approach found in Switzerland could provide another useful element, provided that predominantly Kurdish areas were recognized as bilingual rather than exclusively Kurdish-speaking. Kurdish and Arabic could then both have a role in education, administration, and public services, while the precise arrangements could vary according to local linguistic conditions. However, the Swiss experience also demonstrates the limitations of territoriality: linguistic rights tied exclusively to a particular territory offer little protection to speakers who move elsewhere. This is particularly relevant in Syria, where substantial Kurdish communities live outside predominantly Kurdish areas.

For these communities, Canada's system of individual minority-language education rights offers an important complementary approach. Access to education with Kurdish as the language of instruction could extend beyond a designated Kurdish region, subject to reasonable demographic thresholds. Where sufficient numbers of Kurdish-speaking pupils live in Damascus, Aleppo, or other predominantly Arabic-speaking areas, the state could be required to provide Kurdish-language instruction and, where numbers justify it, appropriate educational facilities. Such an approach would give practical meaning to the recognition of Kurdish as a national language without requiring education with Kurdish as the language of instruction wherever individual Kurdish speakers happen to live. This combination of territorial and individual rights could therefore address one of the principal limitations of a purely territorial model.

A future multilingual system should also extend beyond the relationship between Arabic and Kurdish. Syria's smaller linguistic communities, including speakers of Assyrian/Neo-Aramaic, Armenian, and Turkmen/Turkish, require appropriate protection. The South African example demonstrates the value, but also the limitations, of formally recognizing a broad range of languages, while the Ladin arrangements in South Tyrol provide a possible point of reference for protecting a small territorially concentrated linguistic community. In areas with significant Assyrian communities, for example, Assyrian could be incorporated into public education, while existing private and church-run schools using Assyrian as the language of instruction should be able to continue operating. At the same time, the South Tyrolean experience cautions against constructing language rights around overly rigid linguistic categories that leave insufficient room for bilingual individuals, mixed families, and multilingual identities.

The comparative cases also point towards the potential advantages of decentralizing decisions on language policy. Spain, Switzerland, South Africa, and India all allow language arrangements to vary, to different degrees, according to regional or local circumstances. For Syria, national legislation could establish basic language rights and minimum standards, while leaving regional and local authorities and, where appropriate, individual school communities some scope to adapt their implementation to local linguistic conditions. Such flexibility would be particularly important given the considerable differences between predominantly Arabic-speaking areas, predominantly Kurdish areas, and linguistically mixed regions. At the same time, decentralization should not allow basic language rights to depend entirely on local political majorities.

A further consideration concerns the financial requirements of multilingual language policy. Some of the most comprehensive arrangements examined in this paper, particularly those in Switzerland and South Tyrol, are supported by substantial public resources. For Syria, where resources for rebuilding the education system and public institutions are severely constrained, it will therefore be important to develop language arrangements that provide effective protection while remaining financially and administratively sustainable.

This leads to a broader conclusion emerging from several of the cases examined: formal recognition is not sufficient. Language rights require clear legal entitlements, institutions responsible for implementing them, qualified teachers, teaching materials, administrative capacities, and mechanisms through which individuals and communities can claim their rights when they are not respected. South Tyrol illustrates particularly clearly how linguistic equality can be supported by institutional mechanisms and enforceable rights, while South Africa, India, and Iraqi Kurdistan demonstrate in different ways how a gap can emerge between formal commitments and everyday practice. Decree No. 13 should therefore be regarded as a possible starting point rather than as a language policy in itself. Its recognition of Kurdish as a national language will acquire substantive meaning only if the rights associated with this status are clearly defined and implemented.

English constitutes an additional challenge that should not be underestimated. Across several of the cases examined, English has gained importance because families associate it with higher education, employment, international mobility, and economic opportunity. In India and South Africa, this has contributed to the continuing prominence of English despite policies aimed at strengthening other languages; in Switzerland, the growing preference for English has raised concerns about the teaching of other national languages; and in Iraqi Kurdistan, English has increasingly competed with Arabic as the principal additional language. A similar tension is likely to arise in Syria. English will remain important and should continue to have a place in the curriculum, but its position should not undermine the acquisition of Syria's national languages. In predominantly Kurdish areas in particular, pupils should have the opportunity to acquire Kurdish, Arabic, and English to a sufficiently high level. The challenge is therefore not to choose between these languages, but to determine how they can be introduced and combined without the acquisition of one coming at the expense of another.

Ultimately, a multilingual education system for Syria should neither seek to replace Arabic with Kurdish in predominantly Kurdish areas nor restrict Kurdish to the status of an optional subject within an otherwise exclusively Arabic system. A more promising approach would combine education in the mother tongue, effective acquisition of Arabic as a common national language, meaningful protection of smaller minority languages, individual rights for speakers living outside their traditional linguistic areas, and sufficient flexibility to adapt language policy to local circumstances. Such a system would require compromises between collective language protection and individual choice, as well as between linguistic equality and practical feasibility. The comparative cases examined in this paper suggest that these objectives are not mutually exclusive, but that their successful combination depends less on the formal recognition of linguistic diversity than on how language rights are designed and implemented in practice.

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Multilingual Countries in Comparison: Reflections on the Case of Syria

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