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Comparative Administrative Law: Cross-Jurisdictional Lessons, Challenges and Innovations

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This paper examines the uses and challenges of comparative studies in administrative law by analysing the evolution of administrative systems, judicial oversight, and regulatory frameworks across various jurisdictions. It reviews case law, statutory provisions, and academic literature to illustrate how diverse legal traditions and institutional practices influence administrative decision-making. The analysis demonstrates that comparative studies provide valuable insights into international best practices and the harmonisation of legal frameworks. However, significant challenges arise in reconciling divergent legal terminologies, cultural contexts, and institutional structures, which complicate cross-jurisdictional comparisons. The paper emphasises the need for a structured comparative approach to identify both common principles and key divergences in administrative systems. It further discusses how legal transplants and policy adaptations can improve governance while respecting jurisdiction-specific needs. By analysing the success and failure of administrative reforms across different countries, the study identifies lessons that can inform global governance. It ultimately advocates for mutual learning across jurisdictions to enhance administrative efficiency and accountability, keeping in mind each nation's unique legal and cultural context.

Keywords: *comparative studies, administrative law, judicial oversight, regulatory frameworks, legal harmonisation.*

INTRODUCTION

Public administration, along with administrative law, serves as a foundational element of contemporary governance. It guides the provision of state services, regulates social interactions, and safeguards the public interest. These two fields share a deeply interconnected relationship, as administrative law establishes the structural and procedural framework that governs public administration, policy implementation, and interactions between the state and its citizens. The rise of globalisation and Europeanization has introduced complex challenges that demand coordinated responses. This underscores the increasing importance of comparative studies in administrative law.¹

However, comparing administrative legal systems presents significant difficulties. Each legal framework reflects the unique political, social, and economic context of its respective country, making direct comparison challenging. Legal traditions, institutional structures, and cultural norms often act as barriers to legal harmonisation.² Legislative definitions of key terms such as 'Public Interest' and 'Administrative Discretion' vary significantly across jurisdictions. Some governments rely on detailed codified laws, while others use judge-made precedents or unwritten customary practices.³ These divergent approaches complicate the identification of universal best practices in administrative law.

Comparative administrative law serves two key functions: protecting individuals from governmental overreach and strengthening public accountability mechanisms. Researchers examining various systems can identify best practices, such as the use of ombudsman institutions or e-governance tools to enhance efficiency, but must remain cautious of language traps and conceptual inconsistencies. Administrative reforms that are successful in one jurisdiction often fail in another due to differing legal contexts and institutional structures, necessitating tailored adaptations rather than wholesale legal transplants.

¹ Renata Kusiak-Winter, 'The Evolution of Comparative Administrative Law Studies' (2017) 7(1) *Wroclaw Review of Law Administration & Economics* <<http://dx.doi.org/10.1515/wrlae-2015-0046>> accessed 19 June 2025

² Mariolina Eliantonio and Yves Marique, 'Comparative Administrative Law in Europe: State-of-the-Art Overview and Research Agenda' (2023) 30(6) *Maastricht Journal of European and Comparative Law* <<https://doi.org/10.1177/1023263X241252105>> accessed 19 June 2025

³ *Ibid*

Multinational institutions and transnational regulations demonstrate why comparative administrative law requires increased attention. The growth of international collaboration forces countries to synchronise administrative systems but maintain their sovereignty.⁴ The administrative framework of the European Union proves diverse legal traditions function together within common principles, but conflicts develop from local practices that diverge from regional authority guidelines.⁵ Developing nations frequently encounter conceptual implementation barriers in their implementation of advanced economy administrative models since they differ in both institutional capabilities and social demands. The tension between standardisation and cultural sensitivity stands as a pivotal problem in comparative studies research.

THEORETICAL FOUNDATIONS OF ADMINISTRATIVE LAW

Understanding the Meaning and Scope of Administrative Law: Administrative law is a branch of public law that governs the organisation, functions, and procedures of public authorities responsible for implementing legislation. It ensures that governmental actions remain within the bounds of legality and promotes accountability, fairness, and transparency in administrative decision-making.⁶ While scholars have long debated a precise definition, administrative law broadly concerns itself with the delegation and control of public power. It regulates the exercise of discretion by executive bodies and provides remedies for unlawful administrative actions.

One of the early theorists, John Austin, a 19th-century legal positivist associated with the Analytical School of Jurisprudence, argued that administrative law is concerned with determining the limits of delegated governmental power and the procedures for its implementation. According to Austin, law is the command of the sovereign backed by

⁴ Francesca Bignami, 'Comparative Administrative Law' (2012) GWU Legal Studies Research Paper No 115/2012 <https://scholarship.law.gwu.edu/faculty_publications/157/> accessed 19 June 2025

⁵ *Ibid*

⁶ Susan Rose-Ackerman and Oren Tamir, 'Comparative Administrative Law: Is the US an Outlier? A Concluding Essay' (2023) 40 Yale Journal on Regulation <<https://www.yalejreg.com/nc/comparative-administrative-law-is-the-u-s-an-outlier-a-concluding-essay-by-susan-rose-ackerman-oren-tamir/>> accessed 19 June 2025

sanctions, and administrative law forms part of that structure by guiding the exercise of executive authority.⁷

In India, the Right to Information Act 2005 reflects the administrative law principle of transparency and public accountability. Similarly, in the United Kingdom, the Judicial Review process underpins control over administrative actions by allowing courts to assess the legality of government decisions.

Functions and Features of Administrative Law: Administrative law extends to a wide range of governmental activities, including rule-making (delegated legislation), decision-making (quasi-judicial or executive functions), and enforcement. It also covers investigative and advisory functions and grants bodies the authority to issue binding declarations.⁸

Its Primary Objectives include:

- Ensuring legality and fairness in administrative processes.
- Protecting individual rights against misuse of administrative power.
- Promoting transparency and accountability in governance.
- Providing judicial and administrative remedies, such as writs, injunctions, appeals, and public grievance mechanisms.

The Mechanisms of Control include:

- Judicial Review (e.g., under Article 226 of the Indian Constitution)
- Statutory Appeals and Tribunals (e.g., Central Administrative Tribunal in India)
- Ombudsman Offices (e.g., Lokpal in India, Parliamentary Ombudsman in the UK)
- Media and Public Scrutiny

The U.S. Administrative Procedure Act (1946) ensures due process in rule-making and adjudication by federal agencies. It provides citizens the right to participate in the regulatory process and challenge arbitrary administrative actions.

The Balance between Efficiency and Accountability: A core challenge in administrative law lies in balancing administrative efficiency with individual rights and democratic

⁷ Francesca Bignami, 'Comparative Administrative Law' in Mauro Bussani and Ugo Mattei (eds), *The Cambridge Companion to Comparative Law* (CUP 2012)

⁸ Ralph F Fuchs, 'An Approach to Administrative Law' (1940) 18 North Carolina Law Review
<<https://www.repository.law.indiana.edu/facpub/1600>> accessed 19 June 2025

accountability. Effective governance demands flexibility and speed in decision-making, but this must be tempered by legal safeguards.⁹

In *Council of Civil Service Unions v Minister for the Civil Service*,¹⁰ the House of Lords laid down the three grounds for judicial review, which are illegality, irrationality, and procedural impropriety, marking a turning point in the development of administrative law in the UK.

Approaches to Comparative Administrative Law: Comparative administrative law helps scholars and policymakers understand how different national systems regulate, implement, and control public administration. Two major analytical tools commonly used are the functional approach and the institutional approach.¹¹

The functional approach focuses on how different legal systems solve similar administrative challenges, even if the institutional structures vary. For instance, in the United States, the Administrative Procedure Act (1946) mandates public participation in rule-making through a notice-and-comment process.¹² In Germany, administrative matters are handled by specialised administrative courts, which provide structured adjudication independent from ordinary courts.

The institutional approach, on the other hand, examines the formal bodies responsible for administrative oversight, such as courts, ombudsmen, and regulatory agencies. For example, France has a dual judicial structure where administrative disputes are resolved by the Conseil d'État, which functions independently from the ordinary judiciary. In contrast, the United States and the United Kingdom address administrative disputes through their general courts, supplemented by specialised tribunals and agencies.¹³

India uses a hybrid model. It relies on quasi-judicial tribunals like the National Green Tribunal (NGT) and also on general courts for administrative redress, demonstrating a blend of institutional and functional strategies.

⁹ Ackerman (n 6)

¹⁰ *Council of Civil Service Unions v Minister for the Civil Service* [1985] AC 374

¹¹ Bignami (n 7)

¹² *Ibid*

¹³ *Ibid*

Role of Legal Traditions and Systems -

Legal traditions significantly shape administrative law systems:¹⁴

- Common Law Jurisdictions (e.g., UK, USA, India) develop administrative law through judicial decisions and legal precedent.
- Civil Law Countries (e.g., France, Germany) rely on detailed statutory codes and formal legislative provisions.
- Mixed systems, especially in post-colonial states, incorporate elements from colonial legacies and indigenous practices.

These traditions determine the scope of discretion available to public authorities, the remedies available to citizens, and the forum for dispute resolution.

In France, legal codification provides predictability, whereas in the UK, judicial review plays a central role in controlling executive actions. India, influenced by both traditions, demonstrates how a hybrid legal foundation can evolve into a distinct administrative model.¹⁵

Mechanisms of Administrative Control -

Despite differences in legal traditions, many jurisdictions share common tools to hold administrative bodies accountable. These include:¹⁶

- Judicial Review
- Public Interest Litigation
- Freedom of Information (FOI) Laws
- Ombudsman Institutions

Sweden has pioneered transparency through its principle of public access to government documents. Similarly, the United States guarantees procedural fairness via due process

¹⁴ Fuchs (n 8)

¹⁵ Bignami (n 7)

¹⁶ Eliantonio (n 2)

clauses and administrative hearings. In India, tools like Article 226, the Right to Information Act (2005), and bodies like the Lokpal reinforce accountability.

By comparing these mechanisms, nations can adopt effective control measures from one another, helping to address administrative inefficiencies and enhance citizen trust.¹⁷

THE USES OF COMPARATIVE STUDIES IN ADMINISTRATIVE LAW

Policy Innovation and Legal Transplants: Comparative administrative law provides a critical lens through which nations can explore policy innovation and adapt successful administrative models from other jurisdictions. By examining institutional structures and legal mechanisms abroad, countries can selectively incorporate practices that align with their domestic political and legal cultures.¹⁸

Japan and South Korea implemented administrative reforms by adapting foreign models while preserving indigenous traditions. These reforms were not blindly transplanted but were tailored to local socio-legal conditions, demonstrating that legal borrowing must be context-sensitive to succeed.¹⁹ Comparative analysis shows that mere replication of policies without adapting to institutional capacity, public expectations, or legal culture often fails. Hence, legal transplants require normative adaptation, not just procedural mimicry.

Enhancing Public Accountability and Transparency: Another crucial function of comparative studies lies in strengthening public accountability and ensuring transparency in governance. By evaluating diverse oversight mechanisms, such studies highlight effective structures for citizen engagement and checks on executive power.²⁰ The ombudsman model in Sweden, the notice-and-comment procedure in the USA, and procedural fairness mandates in the UK offer varied paths toward citizen participation and scrutiny.²¹ Comparative studies reveal that transparency and accountability are not tied to any one institutional design.²² Rather, they emerge from legal cultures that prioritise public oversight,

¹⁷ *Ibid*

¹⁸ Hanna Wilberg, 'Administrative Law' (2016) 3 New Zealand Law Review 571

¹⁹ *Ibid*

²⁰ Bignami (n 4)

²¹ Fuchs (n 8)

²² Fazal Rahman Ayoubi and Nazir Jan Noori, 'Role and Importance of Comparative Study of Public Administration' (2025) 5(1) Integrated Journal for Research in Arts and Humanities <<http://dx.doi.org/10.55544/ijrah.5.1.2>> accessed 19 June 2025

whether through judicial enforcement (as in the UK) or administrative design (as in Nordic countries).

Promoting Administrative Efficiency and Reform: Administrative efficiency remains a core objective of governance reforms, and comparative law helps identify structural innovations that reduce bureaucratic delay and enhance service delivery. The Conseil d'État in France functions as both a judicial and advisory body, ensuring quick legal vetting of administrative actions. Meanwhile, the United States streamlines rulemaking through clear timelines and stakeholder input. Efficiency gains are often realised when legal procedures are simplified, decision-making power is decentralised, and public participation is institutionalised. However, comparative evidence also cautions against over-reliance on efficiency at the cost of procedural fairness, especially in developing democracies.

Public Participation Models in Comparative Administrative Law: Effective public administration requires a balance between expert decision-making and democratic participation. Comparative administrative law offers a lens to study how various jurisdictions integrate citizen involvement into their administrative processes, fostering legitimacy, transparency, and responsiveness in governance.²³ While earlier sections highlighted the general benefits of participatory models, this section focuses on concrete institutional comparisons and the distinct regional practices in citizen participation.

India: Participatory Governance through Legal and Institutional Innovation: India provides a unique example of democratized participation in administrative decision-making through its legislation and grassroots mechanisms:

- The Right to Information Act 2005 (RTI) allows citizens to request information from public authorities, empowering them to scrutinise and influence administrative actions.
- Local governance institutions like Gram Sabhas enable direct citizen involvement in planning and resource allocation at the village level.

²³ Fuchs (n 8)

- The Environmental Impact Assessment (EIA) process requires public hearings before major projects are approved, though implementation has faced criticisms over quality and reach.

These mechanisms reflect India's effort to embed participatory rights within formal administrative procedures, even amid challenges like bureaucratic resistance and uneven literacy levels.

ASEAN and the Global South: Emerging Models of Engagement: Participatory practices in the Global South, particularly within ASEAN nations, often evolve in hybrid legal settings combining formal consultation frameworks with customary or informal institutions.²⁴

- Indonesia integrates public consultation through the Law on Public Information Transparency (2008), which mandates government agencies to proactively disclose information and allow citizen input.
- The Philippines has institutionalised people's councils in certain municipalities, enabling non-state actors to influence local administrative decisions.

However, these mechanisms often struggle with implementation gaps, limited digital access, and weak enforcement. Comparative analysis helps identify where participatory ideals are codified in law but remain aspirational in practice.

How International Organisations Use Comparative Administrative Law: International organisations use comparative administrative law to encourage consistency and cooperation among states with different legal traditions. Their functions vary – some serve as advisory bodies promoting best practices, while others possess regulatory or enforcement authority over member states.²⁵ The European Union (EU) plays a uniquely integrative role by directly influencing the administrative systems of its member states. Through mechanisms like the European Court of Justice and the EU Charter of Fundamental Rights, the EU harmonises administrative procedures while accommodating both civil and common law traditions. It enforces core administrative principles such as proportionality, transparency, and legality.²⁶

²⁴ *Ibid*

²⁵ Ayoubi (n 22)

²⁶ Wilberg (n 18)

In contrast, the United Nations (UN) focuses on policy development and capacity-building in administrative law, particularly in post-conflict and developing countries. Its organs, such as the United Nations Development Programme (UNDP), support legal reform through technical assistance and recommendations. Unlike the EU, the UN does not have enforcement powers; adoption of its principles depends on voluntary state cooperation. The World Trade Organisation (WTO) applies administrative principles within a more defined context: international trade regulation.²⁷ It ensures that member states uphold procedural transparency and fairness in trade administration, such as customs processes. Unlike the UN, the WTO has a formal dispute settlement mechanism that allows enforcement of these standards through legally binding rulings.

Meanwhile, the Organisation for Economic Co-operation and Development (OECD) serves a different role altogether. It does not regulate or adjudicate, but influences national administrative reforms through policy research, comparative reports, and peer reviews. Its tools are non-binding but persuasive, such as the OECD Regulatory Policy Outlook, which evaluates governance performance across countries.²⁸ Thus, while the EU enforces administrative law, the UN encourages adoption, the WTO adjudicates compliance, and the OECD advises through data and benchmarking. Their differing roles highlight the flexible and multi-dimensional application of comparative administrative law in global governance.

Responding to Digital Governance Challenges: The increasing reliance on digital tools in public administration has transformed how states deliver services, regulate citizens, and maintain records. Countries are adopting digital governance models to improve efficiency, ensure faster service delivery, and enhance public accessibility. However, this shift also raises serious legal concerns regarding data protection, automated decision-making, and cross-border information regulation.²⁹ Estonia stands as a global model of e-governance, offering nearly all government services online through its secure national digital identity system. Its approach minimises bureaucratic delays and strengthens transparency. Estonia's legal framework simultaneously ensures individual privacy and cybersecurity, aligning

²⁷ Ramesh K Arora, *Eminent Administrative Thinkers Shum Sun Nisa Ali* (Associated Publishing House 1997)

²⁸ Gabriel M Nugent, *Employment Discrimination Based on Sexual Orientation* (William S. Hein & Co. 1998)

²⁹ Ayoubi (n 22)

administrative innovation with strong accountability.³⁰ India's Digital India mission aims to digitise public services across sectors, from income tax filing to digital land records and biometric-based authentication through Aadhaar. While these measures increase administrative access, they have triggered concerns over surveillance and data security. The recently enacted Digital Personal Data Protection Act, 2023, seeks to provide clearer rules on consent, data storage, and state obligations, bringing Indian administrative law closer to global standards.

The European Union's General Data Protection Regulation (GDPR) has set a global benchmark for data protection. It directly influences administrative law by mandating transparency in data use, informed consent, and accountability in automated processes. Notably, GDPR also regulates algorithmic decision-making, requiring explainability and fairness in cases where individual rights are affected by machine-based judgments.

Across jurisdictions, legal challenges are emerging from these reforms. Administrative systems now rely on automated processes that may lack transparency and open the door to algorithmic bias, raising questions about fairness and judicial review.³¹ Moreover, the use of foreign servers and cloud technologies has introduced cross-border jurisdictional conflicts, particularly when data generated in one country is processed under the laws of another. As digital administration becomes the norm, comparative administrative law plays a key role in identifying how states can protect public interest while navigating technological complexity. The need to balance efficiency with accountability, and innovation with legal safeguards, remains central to the development of modern administrative systems.

Resolving Cross-Border Administrative Disputes: The interconnected nature of modern administrative governance has given rise to complex cross-border legal disputes, especially in areas like environmental regulation, economic sanctions, public health, and digital governance. These disputes often involve questions of jurisdiction, sovereignty, compliance with international norms, and the applicability of domestic administrative principles to foreign or global contexts.³²

³⁰ Frank Johnson Goodnow, *Comparative Administrative Law: An Analysis of the Administrative Systems National and Local of the United States, England, France, and Germany* (G. P. Putnam's sons 1893)

³¹ *Ibid*

³² Nugent (n 28)

Comparative administrative law plays a vital role in addressing such challenges by offering a framework for reconciling national administrative practices with international legal standards. In the *Kadi and Al Barakaat International Foundation v Council and Commission* case³³, it is one of the most prominent examples of the growing significance of administrative law in resolving multi-jurisdictional disputes.

In this case, the European Council implemented a United Nations Security Council resolution that froze the assets of individuals suspected of funding terrorism, including Mr. Yassin Kadi. Kadi challenged the measure before the European Court of Justice (ECJ), arguing that it violated his fundamental rights under EU law, particularly the rights to be heard, to effective judicial protection, and property. The ECJ held that even measures implementing binding UN resolutions must comply with fundamental rights as protected by EU law. It emphasised the autonomy of the EU legal order, concluding that the lack of procedural safeguards in the listing process was contrary to basic principles of justice. This judgment affirmed that supranational administrative actions must be subject to judicial oversight and laid the groundwork for balancing global security with human rights protection in administrative law.

Transnational Environmental Disputes: Environmental regulation frequently involves transboundary issues where administrative decisions taken in one jurisdiction affect ecosystems or communities in another. The *Trail Smelter Arbitration* (United States v Canada, 1938 & 1941) is a seminal case where cross-border pollution from a Canadian smelter affected farmers in the U.S. The tribunal ruled that a country is responsible for environmental harm it causes beyond its borders, a principle now recognised in international environmental law. Contemporary examples include transnational river disputes (e.g., Mekong River, Nile Basin) where administrative agencies from multiple nations must cooperate, often with differing mandates, regulatory standards, and data access regimes.

³³ Antonios Tzanakopoulos, *Case T-315/01, Yassin Abdullah Kadi v Council of the European Union and Commission of the European Communities*, 21 September 2005, [2005] ECR II-3649 (Kadi I CFI); *Cases C-402/05 P and C-415/05 P, Yassin Abdullah Kadi and Al Barakaat International Foundation v Council and Commission*, Court of Justice of the EC [2008] ECR I-6351 (Kadi I ECJ); *Case T-85/09, Kadi v Commission* [2010] ECR II-5177 (Kadi II GCEU); *Joined Cases C-584/10 P, C-593/10 P and C-595/10 P, Commission and United Kingdom v Kadi*, Judgment of the Court (Grand Chamber) of 18 July 2013 (Kadi II CJEU) in Cedric Ryngaert et al. (eds), *Judicial Decisions on the Law of International Organizations* (OUP 2016)

Cross-Border Data Sharing and Administrative Control: With the expansion of digital governance, cross-border disputes increasingly revolve around data protection, surveillance, and information sharing. Administrative authorities must navigate conflicting legal standards on data sovereignty, privacy rights, and international cooperation. The Schrems II case³⁴ led the Court of Justice of the European Union to invalidate the EU-US Privacy Shield agreement, ruling that U.S. surveillance laws did not provide adequate protection of EU citizens' data. The case underscores how domestic administrative standards, such as those under the EU General Data Protection Regulation (GDPR), can have extraterritorial implications. Such disputes reflect the evolving role of administrative law in addressing issues of digital jurisdiction and global regulatory alignment.

CHALLENGES IN COMPARATIVE ADMINISTRATIVE LAW

Diversity in Legal Traditions: One of the foremost challenges lies in the diversity of legal traditions across jurisdictions. Countries operate under different systems, common law, civil law, religious law, and mixed systems, each with its own administrative philosophy, historical development, and institutional architecture.³⁵ The diversity makes it difficult to derive universally applicable conclusions or best practices. Reforms based on one system often fail in another due to incompatible legal cultures. For instance, transplanting judicial review procedures from a common law country to a civil law jurisdiction may lead to institutional resistance or inefficiency.

Inconsistent Terminology and Concepts: Terms like judicial review, discretion, and accountability do not carry the same meaning across jurisdictions. Even similar concepts are often rooted in different doctrinal traditions, leading to misinterpretation or oversimplification when comparing systems.³⁶ Conceptual confusion can distort comparative findings and misguide policymakers. Without semantic clarity, there is a risk of false equivalence, where superficially similar practices are assumed to be functionally identical when they are not.

³⁴ *Data Protection Commissioner v Facebook Ireland and Maximillian Schrems* [2020] Case C-311/18

³⁵ Goodnow (n 30)

³⁶ Nugent (n 28)

Rapid Legal and Institutional Change: Administrative law is a dynamic field, heavily influenced by political shifts, economic reforms, and social expectations. As a result, national systems are in a state of constant evolution. Comparisons may become outdated or irrelevant if based on legal frameworks that have since changed. Reforms modelled on static assumptions may fail to address evolving governance needs or the most recent jurisprudential developments.

Methodological Complexity: Researchers face challenges in selecting appropriate methodologies, whether to undertake in-depth case studies of a few jurisdictions or broad, multi-country surveys. Both approaches come with trade-offs between depth and generalizability. Inconsistent or poorly chosen methods lead to limited comparability or overgeneralized conclusions, reducing the usefulness of the research for lawmakers and administrative bodies seeking practical reforms.

Lack of Accessible and Standardised Data: In many countries, especially developing or post-authoritarian states, reliable data on administrative processes, case law, or policy outcomes is limited. Language barriers and poor legal documentation further complicate comparative efforts. The absence of standardised, publicly available data hinders evidence-based policymaking and may lead to bias toward well-documented Western systems, marginalising alternative or indigenous administrative models.

Western-Centric Bias in Scholarship: A significant portion of comparative administrative law literature is dominated by perspectives from Western countries, particularly the United States, the United Kingdom, and European Union member states. This bias results in theoretical overreliance on Western models, which may not be compatible with the political and cultural realities of other regions. Policy outcomes informed by such scholarship may reinforce legal imperialism or fail to resonate with local needs.

CONCLUSION

Comparative administrative law offers valuable insights into how various legal systems regulate, oversee, and reform public administration. This study has shown that while comparative analysis enriches our understanding of global governance mechanisms and policy innovation, it must be pursued with sensitivity to contextual differences across

jurisdictions. A core finding is that successful legal transplants depend on normative and institutional adaptation, rather than direct replication of foreign models.

One major challenge identified is the diversity in legal traditions. Administrative systems operate within unique constitutional, cultural, and historical contexts. As such, a mechanism effective in one jurisdiction may be ineffective or even counterproductive in another. The comparative method, therefore, must remain cautious about imposing 'Best Practices' without evaluating compatibility with local systems.

Additionally, inconsistent legal terminology and conceptual ambiguity significantly complicate comparative research. Terms like discretion, judicial review, and accountability vary widely in their interpretation and application across legal traditions. This lack of semantic clarity can lead to false equivalences and flawed analysis. Hence, a key recommendation is the development of a standardised conceptual framework or glossary to guide comparative studies.

The methodological complexity involved in comparative research is another critical concern. Scholars must navigate between depth and breadth – deciding whether to focus on detailed case studies or conduct wider cross-national surveys. The selection of jurisdictions, data availability, and the dynamic nature of administrative law also influence the reliability and relevance of the comparative findings. A transparent and reflexive methodological approach is essential to produce robust, policy-relevant outcomes.

Finally, this paper highlights the importance of inclusive and balanced scholarship. Current literature often exhibits a Western-centric bias, with an overrepresentation of perspectives from developed countries. This creates a gap in understanding the administrative challenges and innovations emerging from the Global South. For comparative administrative law to truly promote global learning, it must consciously include non-Western legal experiences and prioritise accessibility, data standardisation, and multilingual legal resources.

In conclusion, comparative administrative law holds great promise for fostering administrative reform, enhancing public accountability, and encouraging legal innovation. However, its usefulness depends on addressing the methodological, terminological, and structural challenges discussed above. A context-sensitive, interdisciplinary, and inclusive

approach will ensure that comparative studies contribute meaningfully to the evolution of effective and equitable administrative systems across diverse jurisdictions.