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J. DENIS DERBYSHIRE  
IAN DERBYSHIRE

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Volume 1

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Volume 1

J DENIS DERBYSHIRE  
IAN DERBYSHIRE

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# Preface

There are 192 sovereign nations in the world today, each with its own unique ethnic and social composition and its own unique history. The interplay of these, and other factors, has created, in turn, a unique system of government.

In this book we describe these systems and try to relate them to the social and economic influences which, over the years, have fashioned them. At the same time, we have identified particular features which are common to all, or most, countries and have classified them in an attempt to make objective comparisons.

In our classification we have sought to distinguish between those nations whose citizens have a completely free choice of which people should control the levers of political power and those where that choice is limited. The first we have called multiparty, or pluralistic, states and the second one-party, or monistic. This is an important distinction but it is not the only criterion for deciding whether or not a political system can be said to be democratic.

When the first edition of this book was written, some six years ago, there were 165 independent, sovereign states. Of these, 83, or just under half, could be classified as truly democratic. By 1995 the number had grown to 145 and remained at this figure in 1999, which was some three-quarters of the total.

As we said in our first study of the international political scene, the accession to power in the Soviet Union of Mikhail Gorbachev, in 1985, had the effect of casting a stone into the apparently static pond of Eastern European politics and we predicted that its ripples would spread to other regions. That prediction has come to pass, within a shorter time than we envisaged, and now one-party, monistic states are very much in a minority in most regions of the world. However, reconstructed communist parties have returned to power in several of the recently democratized states in Eastern Europe, with Lech Wałęsa, so instrumental

in the downfall of communism, being replaced as Polish president in November 1995 by the communist leader, Alexander Kwasniewski.

In the pages that follow we have tried to provide a better understanding of political institutions and events in the contemporary world and have addressed ourselves not just to academics and professional observers of the political landscape but also to the more general reader who is looking for a serious, but not over-technical, account of global politics.

When we embarked on this task we believed that our approach was new in a number of ways. First, we have considered all the contemporary states and not just the well-known and obvious. Second, we have attempted to identify connections between a country's political system and its historical, social, and economic background. Third, we have looked in some detail at the dynamics of political systems, including the activities of parties and similar groupings, as well as the formal institutions that states have created. Fourth, partly to make the material more manageable, but also to provide a better understanding of geographical and demographic influences, we have adopted a regional approach to our exposition of political systems. Finally, we have looked at examples of how sovereign states, either by choice or necessity, have found it increasingly profitable to co-operate with each other rather than just compete. Six years later, we believe that this approach is still unique and has been justified by recent events.

Although the task has been enjoyable, there have been inevitable frustrations resulting from the almost impossible task of ensuring that the information about each state is still valid in a world where change tends to be the rule rather than the exception.

'To understand others is a certain way of understanding ourselves' might well be the motto for this book. If we have succeeded in this task of creating a better understanding of politics throughout the world we will be well content.

## Acknowledgments

We would like to record our appreciation for the encouragement and support we have received from our publishers for their faith in us and our project, and for keeping us to our task and ensuring the accuracy of our work. Having said this, we accept that any consequential errors or omissions are ours.

Finally, nearer home, we are particularly grateful to Joyce for her patient encouragement and support.

JDD and IDD  
July 1999

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# 1

## The Comparative Approach

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# Understanding Political Systems

## 1.1 Political animal

The Greek philosopher, Aristotle (384–322 BC), said that man was by nature a political animal. He argued that it was within man's natural development to live in some sort of ordered society under a system of government. In the times in which he lived the kind of community he saw as natural was the comparatively small city-state of ancient Greece, with thousands, rather than millions, of citizens able to practise direct democracy.

In the world of today there are few communities that resemble those small early communities. The Most Serene Republic of San Marino in Italy is probably the best example. It is the sole city-state which survived after the unification of Italy in the 19th century and has the distinction of being the world's oldest republic, its independence recognized and its protection guaranteed by Italy. Because of its small population, about 25,000, San Marino is able to enjoy a uniquely intimate kind of government.

The majority of countries have considerably larger populations, of course, and their governments are more remote from the average citizen. Nevertheless, Aristotle's belief that mankind achieves natural fulfilment by living in a political community seems to have been borne out by subsequent events, as this account of the political systems of the world will try to show.

## 1.2 What is a political system?

So that we can better understand the nature of a political system, it will be helpful if we first attempt to define certain words which are frequently used in everyday speech but whose meanings are not always clear.

We use the word 'government' in a variety of ways. In a general sense we use it to mean an orderly way of running a community's affairs and it is possible to distinguish between local government, perhaps regional government, and national government. The absence of government is anarchy, with everyone looking after

himself or herself: the law of the jungle. In a more specific sense we speak of 'the government' as a body of people who have power to make us behave in certain ways. Because they are the government they have authority as well as power. In other words, their power is legitimate. We will not concern ourselves for the moment about how this power is achieved. That is something we shall discover as we look at each country more closely.

Another word frequently used in this context is 'state'. Often we see state as synonymous with government, with the two words being interchangeable. To some extent this is quite valid: a government department might also be called a department of state. The word should be used a little more precisely, however. Governments come and go, as we all know, but the state may be said to be permanent, comprising the whole apparatus by which a community is governed: the armed forces, the police, the civil service, the judicial system, and so on. This emphasizes elements included in the classic definition of a state by the German sociologist, Max Weber (1864–1920), most importantly the monopoly of the application of legitimate physical violence within a specific territory and the enforcement of a system of rules.

The word can also be used to describe a country which has an independent, internationally recognized, government, such as the state of Israel or the state of Egypt. What then should we say of the United States of America? Is this another use of the word state? No, the word is applicable to nations or parts of nations. It just happens that the contemporary world consists largely of nation-states and the United States is simply a nation-state comprising 50 subnational states. We will look at the concept of the nation-state more closely a little later.

Within the same broad context we speak of 'politicians'. They are the people who achieve, or hope to achieve, power and, in simple terms, run the government. How do they fit into the scheme of things? Civil servants, members of the armed forces, judges, and similar public servants are the permanent personnel of

the state while the politicians provide the temporary element. Politicians are the people who occupy positions of power as long as they have the support of the community, or they may be the people who aspire to power but are temporarily out of office. Exactly how politicians achieve power need not concern us at the moment; this will become evident as our study proceeds. We will see that power is obtained sometimes on the basis of consent, the democratic approach, and sometimes on the basis of force, the autocratic approach.

Both the words government and state are rather static terms but if we add to them the political dimension, provided by politicians and their activities, we have something much more dynamic: a 'political system'.

A political system can probably best be understood in demand-response terms. In the majority of countries politicians are elected to positions of power and authority, the ballot box giving the ordinary citizen an opportunity to make his or her demands known. Politicians will try to anticipate these demands by offering a prospectus of what they will provide if elected – a manifesto of promises – and the elector can then choose between different manifestos. Once a political party has been elected to office it will be judged by its performance and the electorate's response to that performance will again be demonstrated through the ballot box when elections come round again.

A country's political system, then, is more than its institutions and more than the formal processes of government. It includes the dynamic interplay of people's ideas and interests: the whole process of demand and response which politics represents. Even if a government is highly authoritarian, giving little room for the political process to work, there will always be at least an undercurrent of activity which expresses the true aspirations of the people, however subordinated they may be by those with power and authority.

### 1.3 The advantages of comparing systems

The comparative approach is a particularly advantageous way of arriving at a better understanding of political systems. Not just systems in general, but also a specific one about which you may consider yourself to be very knowledgeable.

First, the comparative approach forces you to stand back and look objectively at a particular system. It should be no surprise that some of the best studies of

the American and British systems of government, for instance, have been made by people whose personal experience has been gained in a different political environment.

Second, the comparative approach alerts you to similarities in institutions and processes which make your own system more understandable.

Third, the experience of one country can be used to anticipate the effects of change in the political system of another. For example, a knowledge of the voting system in Ireland, where a form of proportional representation operates, will enable some sort of prediction to be made of the likely impact if it were introduced into the United Kingdom.

Finally, the comparative approach can stimulate interest in the political process and thereby encourage the population's involvement. This is probably the greatest advantage of the approach, achieved through a wider understanding of how countries with different histories, different ethnic compositions, different social problems, and different philosophical backgrounds have tackled the basic problem of creating and sustaining satisfactory institutions and processes of government. It is surely a sad reflection on the state of contemporary democracies that, at best, fewer than 5% of their populations can be classed as being 'regularly' active in a political sense.

### 1.4 The nation-state

The comparisons of political systems which will be made are based on the concept of the nation-state or sovereign state, defined, following Lane and Ersson, as 'a state that recognizes no higher decision-making power outside itself'. Table 1 lists, in order of formation, those nation-states which will be considered. Although today it is seen as the 'natural' political unit for most areas of the world, the nation-state is a comparatively new concept. The nation-state, or 'stato', in the Weberian sense, characterized by the monopoly of the legitimate use of force within a specified territory and the concentration of power in an impersonal administrative organization, is essentially an early modern and modern phenomenon, a product of the Renaissance and succeeding periods. Prior to this, personalized 'segmentary states' predominated. Here authority was layered and shared between local and central, or imperial, rulers, and clear territorial specification of boundaries was lacking. Nevertheless, in this earlier period substantial, quasi-national political units

## Nation-states of the world

Table 1

Country	Region	Year of state formation	Country	Region	Year of state formation
China	Asia	2nd century/ 1368/1949	Australia	Oceania	1901
San Marino	N & W Europe	301	Panama	C America & Caribbean	1903
Japan	Asia	5th century/1603	Norway	N & W Europe	1905
France	N & W Europe	741	Bhutan	Asia	1907
Denmark	N & W Europe	940/1849	Bulgaria	C, E, & S Europe	1908
Ethiopia	C & S Africa	11th century	South Africa	C & S Africa	1910
Portugal	N & W Europe	1128	Albania	C, E, & S Europe	1912
Andorra	N & W Europe	1278	Finland	N & W Europe	1917
Monaco	N & W Europe	1297	Austria	N & W Europe	1918
Liechtenstein	N & W Europe	1342	Estonia	C, E, & S Europe	1918/1991
Thailand	Asia	1350	Hungary	C, E, & S Europe	1918
Vatican City State*	N & W Europe	1377/1929	Poland	C, E, & S Europe	1918
Spain	N & W Europe	1492	Ukraine	C, E, & S Europe	1918/1991
Iran	M East & N Africa	1499	Yugoslavia	C, E, & S Europe	1918/1992
Sweden	N & W Europe	1523	Lithuania	C, E, & S Europe	1919/1991
Russian Federation	C, E, & S Europe	1547/1917/1991	Latvia	C, E, & S Europe	1920/1991
Netherlands	N & W Europe	1648	Mongolia	Asia	1921
Switzerland*	N & W Europe	1648	Egypt	M East & N Africa	1922
United Kingdom	N & W Europe	1707	Turkey	C, E, & S Europe	1923
Afghanistan	Asia	1747	Iraq	M East & N Africa	1932
Nepal	Asia	1768	Saudi Arabia	M East & N Africa	1932
United States	N America	1776	Ireland, Republic of	N & W Europe	1937
Haiti	C America & Caribbean	1804	Iceland	N & W Europe	1944
Paraguay	S America	1811	Lebanon	M East & N Africa	1944
Argentina	S America	1816	Jordan	M East & N Africa	1946
Chile	S America	1818	Philippines	Oceania	1946
Costa Rica	C America & Caribbean	1821	Syria	M East & N Africa	1946
Mexico	C America & Caribbean	1821	India	Asia	1947
Brazil	S America	1822	Pakistan	Asia	1947
Peru	S America	1824	Korea, North	Asia	1948
Bolivia	S America	1825	Korea, South	Asia	1948
Uruguay	S America	1825	Myanmar	Asia	1948
Greece	C, E, & S Europe	1829	Sri Lanka	Asia	1948
Belgium	N & W Europe	1830	Indonesia	Asia	1949
Colombia	S America	1830	Taiwan*	Asia	1949
Ecuador	S America	1830	Libya	M East & N Africa	1951
El Salvador	C America & Caribbean	1830	Oman	M East & N Africa	1951
Venezuela	S America	1830	Cambodia	Asia	1953
Tonga*	Oceania	1831/1970	Laos	Asia	1954
Honduras	C America & Caribbean	1838	Vietnam	Asia	1954
Nicaragua	C America & Caribbean	1838	Morocco	M East & N Africa	1956
Guatemala	C America & Caribbean	1839	Sudan	C & S Africa	1956
Dominican Republic	C America & Caribbean	1844	Tunisia	M East & N Africa	1956
Liberia	C & S Africa	1847	Ghana	C & S Africa	1957
Luxembourg	N & W Europe	1848	Malaysia	Asia	1957
New Zealand	Oceania	1853	Guinea	C & S Africa	1958
Italy	N & W Europe	1861	Israel	M East & N Africa	1958
Canada	N America	1867	Benin	C & S Africa	1960
Germany	N & W Europe	1871/1949/1990	Burkina Faso	C & S Africa	1960
Romania	C, E, & S Europe	1881	Cameroon	C & S Africa	1960
Cuba	C America & Caribbean	1899			

*continues*

Nation-states of the world (continued)

Table 1

Country	Region	Year of state formation	Country	Region	Year of state formation
Central African Republic	C & S Africa	1960	Guinea-Bissau	C & S Africa	1974
Chad	C & S Africa	1960	Angola	C & S Africa	1975
Congo, Democratic Republic of	C & S Africa	1960	Cape Verde	C & S Africa	1975
Congo, Republic of	C & S Africa	1960	Comoros	C & S Africa	1975
Côte d'Ivoire	C & S Africa	1960	Mozambique	C & S Africa	1975
Cyprus	C, E, & S Europe	1960	Papua New Guinea	Oceania	1975
Gabon	C & S Africa	1960	São Tomé e Príncipe	C & S Africa	1975
Madagascar	C & S Africa	1960	Suriname	S America	1975
Mali	C & S Africa	1960	Seychelles	C & S Africa	1976
Mauritania	C & S Africa	1960	Djibouti	C & S Africa	1977
Niger	C & S Africa	1960	Dominica	C America & Caribbean	1978
Nigeria	C & S Africa	1960	Solomon Islands	Oceania	1978
Senegal	C & S Africa	1960	Tuvalu*	Oceania	1978
Somalia	C & S Africa	1960	Kiribati*	Oceania	1979
Togo	C & S Africa	1960	St Lucia	C America & Caribbean	1979
Kuwait	M East & N Africa	1961	St Vincent an the Grenadines	C America & Caribbean	1979
Sierra Leone	C & S Africa	1961	Vanuatu	Oceania	1980
Tanzania	C & S Africa	1961	Zimbabwe	C & S Africa	1980
Algeria	M East & N Africa	1962	Antigua	C America & Caribbean	1981
Burundi	C & S Africa	1962	Belize	C America & Caribbean	1981
Jamaica	C America & Caribbean	1962	St Kitts and Nevis	C America & Caribbean	1983
Rwanda	C & S Africa	1962	Brunei	Asia	1984
Trinidad & Tobago	C America & Caribbean	1962	Micronesia, Federated States of	Oceania	1986
Uganda	C & S Africa	1962	Marshall Islands	Oceania	1990
Samoa (Western)	Oceania	1962	Namibia	C & S Africa	1990
Kenya	C & S Africa	1963	Yemen	M East & N Africa	1990
Malawi	C & S Africa	1964	Armenia	C, E, & S Europe	1991
Malta	N & W Europe	1964	Azerbaijan	C, E, & S Europe	1991
Zambia	C & S Africa	1964	Belarus	C, E, & S Europe	1991
Gambia, The	C & S Africa	1965	Croatia	C, E, & S Europe	1991
Maldives	Asia	1965	Georgia	C, E, & S Europe	1991
Singapore	Asia	1965	Kazakhstan	Asia	1991
Barbados	C America & Caribbean	1966	Kyrgyzstan	Asia	1991
Botswana	C & S Africa	1966	Moldova	C, E, & S Europe	1991
Guyana	S America	1966	Slovenia	C, E, & S Europe	1991
Lesotho	C & S Africa	1966	Tajikistan	Asia	1991
Equatorial Guinea	C & S Africa	1968	Turkmenistan	Asia	1991
Mauritius	C & S Africa	1968	Uzbekistan	Asia	1991
Nauru*	Oceania	1968	Bosnia-Herzegovina	C, E, & S Europe	1992
Swaziland	C & S Africa	1968	Macedonia	C, E, & S Europe	1992
Fiji	Oceania	1970	Czech Republic	C, E, & S Europe	1993
Bahrain	M East & N Africa	1971	Eritrea	C & S Africa	1993
Bangladesh	Asia	1971	Slovakia	C, E, & S Europe	1993
Qatar	M East & N Africa	1971	Palau (Belau)	Oceania	1994
Bahamas	C America & Caribbean	1973			
United Arab Emirates	M East & N Africa	1971			
Grenada	C America & Caribbean	1974			

\* Not members of the UN.

**The historical and regional pattern of nation-state formation****Table 2**

Period	Number of states formed									Total
	Asia	Central America & Caribbean	Central, Eastern, & Southern Europe	Central & Southern Africa	Middle East & North Africa	North America	Northern & Western Europe	Oceania	South America	
Pre AD 1000	0	0	0	0	0	0	3	0	0	3
1000–1599	2	0	1	1	1	0	7	0	0	12
1600–1799	3	0	0	0	0	1	3	0	0	7
1800–1899	0	9	2	1	0	1	4	2	10	29
1900–1950	10	1	6	1	6	0	5	2	0	31
1951–1975	7	5	0	40	10	0	2	4	2	70
1976–1999	6	6	15	5	1	0	0	7	0	40
<i>Total</i>	<i>28</i>	<i>21</i>	<i>24</i>	<i>48</i>	<i>18</i>	<i>2</i>	<i>24</i>	<i>15</i>	<i>12</i>	<i>192</i>

were established in a number of countries in Europe, Asia, and North Africa and this has been taken as the date of state formation for 11 countries.

As Table 2 shows, no less than 141 of the 192 states which will be examined in Section II of this volume are products of the present century: 98 being post-1959 creations. In the Middle East and Africa only three of the 66 were in existence before 1910, and even in Europe, where a majority of 'old' states might be expected, more than half of them achieved full, independent nationhood after World War I.

Before the 20th century most of the world's inhabitants were, in one way or another, in the thrall of the established Western European powers and if a datum point of, say, 1800 is taken, only 22 of today's 192 states existed in a form that might be readily recognizable now. Between 1800 and 1850 the world witnessed its first significant wave of nation-state formation. Twenty-three states originated during this period, including 18 in Central and Southern America, which had been liberated from Spanish colonial control. The second and, numerically, the most important wave of state-building occurred between 1944 and 1984. During this period, 97, or half of the contemporary world's nation-states, were established. This was made possible by European decolonization in Africa, Asia, the Middle East, the Caribbean, and Oceania. The final, and certainly the most dramatic, wave of state formation occurred between 1990 and 1994. Twenty-five new sovereign states came into existence. The great majority were situated in Central and Eastern Europe and

**Average ages of nation-states (1999)****Table 3**

Region	Number of states	Average age (years)	Standard deviation
Asia	28	110	170
Central America & Caribbean	21	87	69
Central, Eastern, & Southern Europe	24	56	94
Central & Southern Africa	48	56	132
Middle East & North Africa	18	70	106
North America	2	178	46
Northern & Western Europe	24	442	430
Oceania	15	46	49

Central Asia, and their formation was the direct result of the dissolution, in 1991, of the formal and 'informal' empire of the Soviet Union and the collapse of the Yugoslav socialist federation. In addition, in Oceania and Western Europe, a number of former 'Trust Territory' colonies and semi-sovereign micro-states have become fully fledged sovereign states since the first edition of this title was published. However, two states have disappeared, as a consequence of the unification of both Germany and Yemen.

Table 3 sets out the average age of states in the



regions of the world. The youngest states, on average half a century old, are to be found in Oceania, Africa, and Central and Eastern Europe. Though formerly known as the 'New World', the states of the Americas are, on average, now more than a century and a half old. However, it is Northern and Western Europe, the birthplace of the Weberian 'modern state', which contains the oldest group of nation-states of the world, with an average antiquity of four centuries.

A nation may be described as a group of people, often from different backgrounds, and sometimes from different races, who have come to live together and have adopted a common identity. The unity of a nation is usually reinforced by a common language and sometimes a common religion. A state is the name given to the whole apparatus of government which a nation creates as the machine for operating its political system.

The nation-state is then enshrined and perpetuated by the adoption of symbols such as a national flag and a national anthem. The human apex of the nation-state is the individual designated as head of state, in the person of a king, queen, or president. Sometimes the head of state is little more than a symbol of national unity, with few or no political powers. Sometimes the roles of head of state and head of government are combined but, in such cases, an attempt is usually made to differentiate between the two roles. In the United States, for example, the office of president generally attracts the respect of most citizens regardless of the personality or political views of the holder.

The nation-state manifests itself in a wide variety of different forms, ranging from the democratic to the highly authoritarian. It is this rich variety which provides the material for what will follow.

## 1.5 The plan of the book

The first part of the book concentrates on the comparative approach, looking first at the various constitutional forms which can be adopted for political systems and then at the philosophies or ideologies which underlie the constitutional structures. Then executives, heads of state, and heads of government, and assemblies, or parliaments, in different countries are compared. Then, moving on to the more dynamic elements of political systems, voting methods and parties are examined.

The second part is designed to show political systems in action, giving a factual account of the political institutions and processes of each country and an objective

summary of how they currently operate. One hundred and ninety-two states are covered. They include the current 185 full members of the United Nations, plus the seven independent states of Kiribati, Nauru, Switzerland, Taiwan, Tonga, Tuvalu, and the Vatican City.

The seven non-UN states have been added because all have full national sovereignties and their presence outside the United Nations organization has no useful bearing on the subject matter of our present examination of political systems. Switzerland, for example, has chosen, on the basis of its long history of neutrality, not to be a UN member and Taiwan was a member, under the title of the Republic of China, from 1945 to 1971, when the People's Republic of China received full international recognition. The South Pacific states of Kiribati, Nauru, and Tuvalu have determined on a neutralist course and have not applied for direct UN representation. However, Tonga applied for membership in 1999. The Vatican City, as a purely theocratic state, has jealously retained its political neutrality.

The states in Table 1 that are not current members of the United Nations are denoted by asterisks. The dates indicate the year of each country's inception as a nation-state. This date will normally be the year of release from colonial control or in which its first constitution was adopted, which may or may not be the one currently in force. In the case of a minority of countries, particularly those with dates prior to the 19th century, the inception of nationhood will pre-date the adoption of the first constitution or a codified constitution may never have been adopted.

The 192 states have been grouped into nine geographical regions: Asia; Central America and the Caribbean; Central, Eastern, and Southern Europe; Central and Southern Africa; the Middle East and North Africa; North America; Northern and Western Europe; Oceania; and South America. This classification has been chosen in preference to one based purely on philosophical values, such as liberal-democratic, totalitarian, and so on. Such an approach is superficially attractive but fraught with difficulties. It is, inevitably, subjective and can have the effect of distorting the profile of a political system so as to force it into one of the chosen categories. On the other hand there are, apart from convenience, some good reasons for adopting the regional approach.

First, there is an undoubted link, as will be demonstrated, between a country's geography and history and the political system it develops. A look at the continent of America, and its associated islands, will illustrate this point.

The whole of North America was at one time a British colony. The fact that Canada, which retained its connection with Britain, also retained aspects of the British constitution in its political system is understandable. Equally understandable is the recognition that the United States, which broke its link with Britain 200 years ago, chose to develop a different system, which looks more guardedly at the dangers of unfettered executive power and seeks to control and restrain it. The US Constitution, therefore, reflects other influences, such as the political climate in 18th-century France.

The geography and social composition of North America have also had effects on the political systems of both Canada and the United States, resulting in federal structures of government which take into account the size and diversities of both countries.

Moving south down the continent, the fact that much of Central and South America was once part of a Spanish empire whereas the islands of the Caribbean came under British and French influence is, again, reflected in their political systems.

Second, there is a discernible link between a country's ethnic characteristics and the political system it develops and these characteristics tend to be regionalized in many cases. For example, it is not surprising that the majority of Islamic states are to be found in the Middle East, North Africa, and West Asia.

One somewhat artificial region which has been used for classification purposes is Oceania. Where exactly are its boundaries? Indeed, can it be said to exist at all? For the purposes of this book it is regarded as including Australasia and those island territories in the Pacific which do not fit easily into any other of the regional groupings which have been chosen.

The arbitrary nature of the classification is freely admitted and no apologies are offered. Without such an approach much of the material would have been less manageable and, in any event, for the majority of states alternative groupings would not have brought out so clearly the influences of history, geography, and social development.

The third part of the book deals with residual territories in the world which cannot be viewed as fully fledged independent states. Into this category fall the 44 overseas colonies and external dependent territories that still exist in the world of today.

This final part also looks beyond nation-states and their dependencies to regional and global groupings. Here it is recognized that the accelerated improvements

in communications of all kinds, and the growing economic interdependence of countries, will, inevitably, cause the world to shrink in political as well as physical terms and, as a result, seems likely to lead to a diminution in absolute levels of national sovereignty.

## Recommended reading

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# Constitutions

## 2.1 What is a constitution?

A constitution can be regarded in two ways. First, it is a general statement of how a country is governed. For example, the US Constitution could be described as republican, federal, and presidential, whereas that of the United Kingdom would be monarchical, unitary, and parliamentary. For someone familiar with 'constitutional language', but who knew nothing about the political systems of the United States and the United Kingdom, these two statements would say something, but not much.

On the other hand, for someone completely unversed in constitutional and political terminology the two descriptions would do little or nothing to advance a knowledge of the two countries. 'Republican', 'monarchical', 'federal', 'unitary', 'presidential', and 'parliamentary' are all words which are intended to have precise meanings within the context of an exposition of a political system.

In an even more general sense a constitution may be said to be 'liberal' or 'authoritarian', using two contrasting words which can be found in any nontechnical dictionary. These distinctions would probably conjure up a picture of two political systems that a layman would understand. If you had the choice, which would you prefer: liberal or authoritarian? Most people would choose the former, if only because it had a more 'comfortable' sound. But if one constitution was said to be more liberal than another or more authoritarian than another, difficulties would immediately be created.

To use the word constitution in a general sense, therefore, is not particularly helpful. It is rather like saying that France has better weather than Britain. What parts of France and Britain? What times of the year? Is the weather consistent, year in and year out? Obviously, more questions are raised than answered.

In a more specific sense, a constitution is a document or set of documents describing the framework of a political system. It stipulates where power lies within a state, what the institutions of government are, how they are constructed and how they are intended to operate. In doing so, it provides what might be said to be a set of

rules for politicians in a particular country to follow: what offices they can hold, how they get to office, what they can do and not do in office, how laws are made, how they are enforced, how disputes between citizens and the state are resolved.

## 2.2 What is not a constitution?

A constitution falls far short of being an accurate description of a political system. For example, it is unlikely to even mention political parties or any other forms of organized interests. It will say how power is distributed but not how it is used.

There are several possible analogies which could be used to point out differences between a constitution and a political system but the most accurate is probably a theatrical one. A constitution can be said to be the text of a play whereas the political system is its enactment. Often a constitution even falls short of being a complete text and is rather more a plot with a cast of characters. There are two missing elements which are needed if a constitution is to become alive and translated from a written text into a live production.

The first is political activity or the interplay of power. In other words, how a head of government arrives at a position of power, how that power is used, how he/she and his/her supporters try to retain power, and how their opponents try to divest them of it. This is where the activities of parties and interest groups are all important.

The second missing element is what are called constitutional conventions. These are the understandings which politicians accept as being the unwritten rules of how a constitution should work in practice. Conventions bring flexibility and reality into the political process. They allow a constitution to remain firm in its fundamentals but flexible enough to adapt to changing political circumstances.

The use of the word convention is, perhaps, unfortunate because it can have a very different meaning, particularly in the United States where it is the name given to conferences or rallies of political parties. The

Post-1989 constitutions (85)

Table 4

State	Year	Region	State	Year	Region
Albania	1998	C, E, & S Europe	Moldova	1994	C, E, & S Europe
Andorra	1993	N & W Europe	Mongolia	1992	Asia
Angola	1991	C & S Africa	Morocco	1992	M East & N Africa
Argentina	1994	S America	Mozambique	1990	C & S Africa
Armenia	1995	C, E, & S Europe	Namibia	1990	C & S Africa
Azerbaijan	1995	C, E, & S Europe	Nepal	1990	Asia
Bangladesh	1991	Asia	Niger	1996*	C & S Africa
Belarus	1996	C, E, & S Europe	Nigeria	1999	C & S Africa
Belgium	1993	N & W Europe	Oman	1996	M East & N Africa
Benin	1990	C & S Africa	Paraguay	1992	S America
Bosnia-Herzegovina	1995	C, E, & S Europe	Pelau	1992	Oceania
Bulgaria	1991	C, E, & S Europe	Peru	1993	S America
Burkina Faso	1991	C & S Africa	Poland	1997	C, E, & S Europe
Burundi	1992	C & S Africa	Romania	1991	C, E, & S Europe
Cambodia	1993	Asia	Russian Federation	1993	C, E, & S Europe
Cape Verde	1990	C & S Africa	Rwanda	1995	C & S Africa
Central African Republic	1995	C & S Africa	São Tomé e Príncipe	1990	C & S Africa
Chad	1996	C & S Africa	Saudi Arabia	1992	M East & N Africa
Colombia	1991	S America	Seychelles	1993	C & S Africa
Comoros	1996*	C & S Africa	Sierra Leone	1991	C & S Africa
Congo, Republic of	1992	C & S Africa	Slovakia	1992	C, E, & S Europe
Croatia	1990	C, E, & S Europe	Slovenia	1991	C, E, & S Europe
Czech Republic	1992	C, E, & S Europe	South Africa	1997	C & S Africa
Djibouti	1992	C & S Africa	Sudan	1998	C & S Africa
Equatorial Guinea	1991	C & S Africa	Taiwan	1991	Asia
Eritrea	1997	C & S Africa	Tajikistan	1994	Asia
Estonia	1992	C, E, & S Europe	Thailand	1997	Asia
Ethiopia	1994	C & S Africa	Togo	1992	C & S Africa
Fiji	1990	Oceania	Turkmenistan	1992	Asia
Gabon	1991	C & S Africa	Uganda	1995	C & S Africa
Gambia	1997	C & S Africa	Ukraine	1996	C, E, & S Europe
Georgia	1995	C, E, & S Europe	Uzbekistan	1992	Asia
Ghana	1992	C & S Africa	Vietnam	1992	Asia
Guinea	1991	C & S Africa	Yemen	1994	M East & N Africa
Guinea-Bissau	1991*	C & S Africa	Yugoslavia	1992	C, E, & S Europe
Indonesia	1998	Asia	Zambia	1991	C & S Africa
Kazakhstan	1995	Asia			
Kyrgyzstan	1994	Asia			
Laos	1991	Asia			
Latvia	1993	C, E, & S Europe			
Lebanon	1990	M East & N Africa			
Lesotho	1993	C & S Africa			
Lithuania	1992	C, E, & S Europe			
Macedonia	1991	C, E, & S Europe			
Madagascar	1992	C & S Africa			
Malawi	1994	C & S Africa			
Maldives	1998	Asia			
Mali	1992	C & S Africa			
Mauritania	1991	C & S Africa			

\* Currently suspended, following military coup

Post-1989 constitutions by region

Northern and Western Europe	2
Central, Eastern, and Southern Europe	21
Middle East and North Africa	5
Central and Southern Africa	36
North America	0
Central America and the Caribbean	0
South America	4
Asia	15
Oceania	2

combined term, constitutional convention, refers, in addition, in the United States to a special meeting of state government representatives, called at the request of two-thirds of state legislatures, to draft new amend-

ments to the constitution. A better approach would be to speak of conventional behaviour, in other words customary practices which politicians adopt because experience has shown that they make the governmental

process work more smoothly. This conventional behaviour acts as a lubricant to the political system.

A constitutional convention begins life as an attempt to solve a problem or potential problem. If it is successful then it may be accepted by politicians as an agreed way of approaching a similar problem in the future. If it works successfully on a number of occasions there will be tacit agreement that it has achieved the status of a constitutional convention. It may even be written into a constitution as a formal amendment so that there will be no confusion about whether or not this, procedure should always be followed.

In the United Kingdom there is no legislation which says that the prime minister must be a member of the House of Commons but, although in the second half of the 19th century no fewer than six of the 12 governments were headed by peers, there has been no prime minister sitting in the House of Lords since 1895. A constitutional convention has established this practice. A similar convention ensures that government ministers must be members of one or other of the Houses of Parliament.

To recapitulate, a constitution provides the framework for a political system. It does not give a full, or even accurate, picture of how the system works in practice.

## 2.3 Written and unwritten constitutions

Most states have a basic, written document that is called its constitution. It may not be the same one that was adopted when the state first came into existence. Even if it is the original, it is likely to have been amended several times since its original adoption.

The world's oldest functioning written constitution is to be found in the micro-state of San Marino, having been first drafted in 1600. The constitutions of Canada (1774) and the United States (1787) are the next oldest (although Canada was British at the time) while a further eight constitutions currently in use, in Western Europe (Belgium, Denmark, Luxembourg, Norway, Sweden, and Switzerland) and South America (Argentina and Bolivia), date back to the 19th century. The remaining states in the world have 20th-century constitutions although in some cases, for example in France and Poland, these have superseded much earlier (late 18th or 19th century) constitutions. Some were adopted, for example those of Austria and Latvia, during the wave of democratic constitutional diffusion that followed the end of World War I. However, most date

from the postwar era and, as Table 4 shows, a staggeringly large proportion, 85, corresponding to more than two-fifths of all written constitutions, have been adopted during the current decade, usually replacing an earlier written constitution. As a consequence, many of the world's constitutions are barely half a decade old.

As Table 4 shows, most of these 'fledgling constitutions' have been adopted by states in Africa, where a wave of democratization has swept away many former one-party regimes, and in Central and Eastern Europe and Asia, being related chiefly to the collapse of communism. As a consequence, the average age of constitutions is low in these regions. This is shown in Table 5.

A minority of states do not have such a basic document. Excepting those African states in which the existing constitution has been temporarily suspended, of the 192 states listed in Table 1 only six fall into this category: Bhutan, Israel, New Zealand, San Marino, the United Kingdom, and the Vatican City State. Because of this they are often said to have unwritten constitutions. This is not strictly true.

Although the king of Bhutan would appear to have unlimited powers, with no constitution to restrain him, there are written rules which govern procedures for elections to the Royal Advisory Council and the National Assembly and say how they operate, and the king is expected to ensure they are observed.

Israel has no single document which it calls a constitution, but in 1950 the state parliament voted to adopt one by evolution over an unspecified period of time and since then a number of laws have been passed which are regarded as being part of the constitution. The Jewish Holy Book, the Torah, also remains an ancient source of political authority.

When it became a fully independent state, New Zealand decided to model its political system on that of the United Kingdom even to the extent of not adopting a formal, written constitution. Nevertheless, there are certain pieces of legislation which are seen to have a particular constitutional significance, such as the Acts which determine the eligibility of voters and their representatives and the methods of voting.

San Marino, although lacking a formal constitution, follows a basic set of 'governing principles', framed in 1600; while the Vatican City State follows principles set out in the 1929 Lateran Treaty.

The United Kingdom is usually cited as the classic example of a state without a written constitution but, again, as in the other three countries described above, there are Acts of Parliament which are regarded as

being constitutionally important. The most notable probably is the 1689 Bill of Rights which established the legislative supremacy of Parliament and from which the rest of the evolutionary constitution developed. In more recent years the legislation restricting the powers of the House of Lords, the Parliament Acts of 1911 and 1949, and widening the franchise, the Reform Acts of 1832, 1867, 1884, 1918, 1928, 1948, and 1970, must be regarded as being a form of constitutional amendment, as must 1997-98 legislation setting up Welsh and Northern Ireland assemblies and a Scottish parliament.

Thus it is not really accurate to distinguish between written and unwritten constitutions. A better distinction would be between codified and uncoded documents for it is certain that, although it would probably be a long and tortuous process, it would be quite possible to draw up a written, codified constitution for the United Kingdom, and for the other seven countries detailed above, if it was thought useful and necessary.

## 2.4 What a constitution contains

Individual constitutions do, of course, vary but most contain certain basic statements about the institutions which have been created to govern a state and how they are expected to operate. Some constitutions go further and, being framed either at a state's inception or following a major political upheaval resulting in a change of regime, identify the kind of society a political system is trying to create and maintain.

The main thrust of most constitutions is to distinguish between the three basic powers of government: the power to make laws, the legislative function; the power to enforce laws, the executive function; and the power to interpret laws and adjudicate in disputes between the citizen and the state, the judicial function.

The US Constitution, for example, has seven main Articles:

- Article 1 defines the legislative powers;
- Article 2 deals with the office of president, as the nation's chief executive;
- Article 3 sets out the powers of the courts, including the Supreme Court;
- Article 4 deals with relations between the individual states;
- Article 5 describes how the Constitution can be amended;

### Average age of state constitutions

Table 5

Average age by world regions as of 1999

Region	Number of written constitutions	Average age
Asia	27	15
Central America & the Caribbean	21	25
Central, Eastern, & Southern Europe	25	9
Central and Southern Africa	39	10
Middle East & North Africa	17	23
North America	2	114
Northern & Western Europe	20	51
Oceania	14	33
South America	12	17

Articles 6 and 7 deal mainly with arrangements for transforming a loose federation of states into a full union.

The constitution of the Fifth French Republic has 14 main Titles:

- Title 1 deals with the sovereignty of the Republic;
- Title 2 sets out the powers and duties of the president;
- Title 3 describes the role of the prime minister and the rest of the government;
- Title 4 sets out the structure and functions of Parliament;
- Title 5 deals with the relationship between Parliament and the government;
- Title 7 sets out the composition and role of the Constitutional Council;
- Title 8 describes judicial powers;
- Title 10 sets out the composition and role of the Economic and Social Council;
- Title 14 describes how the constitution can be amended.

The other Titles deal with detailed, specific matters.

Many constitutions begin with a broad statement of the aims which they hope to achieve. The preamble to the US Constitution of 1787 reads:

'We, the people of the United States, in order to form a more perfect Union, establish Justice,

insure domestic Tranquillity, provide for the common Defense, promote the general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America.'

The preamble to the French constitution of 1958 reads:

'The French people hereby solemnly proclaim their attachment to the Rights of Man and the principles of national sovereignty as defined by the Declaration of 1789, reaffirmed and completed by the Preamble to the Constitution of 1946.'

Most states have a Bill of Rights, guaranteeing certain basic individual rights, such as freedom of speech and freedom of assembly, either incorporated in or associated with a codified constitution. It would be possible for any state to adopt such a charter even without a codified constitution, and whether or not to have a Bill of Rights has been a matter of debate for some years within the United Kingdom.

Although the great majority of states have a guarantee of individual rights either built into their constitutions or associated with them, the mere fact of there being such a written guarantee should not be assumed to mean that such rights really exist and are protected. Some of these apparent guarantees are couched in rather limited terms. The Iranian constitution, for example, states that the press is free but adds: 'except in matters that are contrary to public morality or insult religious belief'.

Some constitutions contain explicit guarantees of specific individual rights. That of Honduras, for example, enunciates the right to work but states that daytime work should not exceed eight hours per day and 44 hours per week, while the limits on night work are set at six hours per night and 36 hours per week.

The Egyptian constitution contains a strong statement on human rights and specifically states that 'houses have sanctity' and are protected. The constitutions of Germany and Lebanon also give protection for housing, while El Salvador provides for an attorney-of-the-poor to protect the least advantaged citizens.

The German constitution also asserts the rights of conscientious objectors; the Moldovan constitution establishes 'permanent neutrality' for the country, banning the stationing of foreign troops on Moldovan soil; and that of Japan declares the renunciation 'for ever of war as a means of settling international disputes'. The

Croatian constitution, however, contains the caveat that in a state of war some guaranteed rights may be restricted.

The pre-1997 Fijian constitution awarded positive discrimination to ethnic Fijians and Polynesians of Rotuma Island in the allocation of judicial and government posts.

Whether or not individual rights really are guaranteed and protected needs therefore to be determined by rather more objective means than just the reading of such a guarantee in a constitution.

Several constitutions set out the nature and objectives of the state. The pre-1990 constitution of Burkina Faso, for example, described it as a 'revolutionary, democratic, unitary and secular republic'; the 1982 Guinean constitution declared the country to be an 'anti-colonialist and anti-imperialist republic'; while the North Korean constitution describes this socialist state as being in the stage of the 'dictatorship of the proletariat', stresses the importance of national self-reliance, or Juche, and embraces the goal of national reunification, by 'peaceful means'. The constitution of Mongolia proclaims a 'multi-structured economy', taking into account 'universal trends of world economic development and national conditions'.

Clearly the framers of constitutions have often seized the opportunity of putting their personal imprints on documents which they hoped would give clear indications of the paths they wished their countries to follow. The fathers of the US Constitution provided the most significant example of this attempt to define a nation's future.

## 2.5 Rigidity and flexibility

Sometimes attempts are made to distinguish between what are seen as rigid and flexible constitutions, usually on the basis of how easily a constitution adapts to changing circumstances. If it adapts readily it is said to be flexible and if it does not it is rigid.

Perhaps understandably, an unwritten constitution suggests great flexibility. After all, there is no formal, legalistic procedure for making a change. If the political will is there then a change will take place, probably by introducing a new constitutional convention or usage, or discarding an old one. The assumption that a codified constitution is less flexible than an uncoded one is often misleading. When a usage can be changed or discarded without any technical obstacles it seems reasonable to conclude that the politicians who might



make a change will approach a proposal very warily.

If a change has to go through some elaborate, formal procedure, such as in the United States, where an amendment to the Constitution has to be proposed by a two-thirds vote of both houses of Congress and then ratified by the legislatures of three-quarters, or 38, of the 50 states of the Union, it seems reasonable to assume that a lightly or poorly conceived change will get a thorough consideration before it is finally accepted. Thus there have been only 27 amendments to the US Constitution (1789), ten of which, the so-called 'Bill of Rights', were passed in 1791. The most notable proposed change which failed at the second ratification hurdle was the proposed Equal Rights Amendment. This sailed through Congress in 1971–72, but was approved by only 35, or 70%, of the states in the Union. In other states such as Japan and South Korea, constitutional amendments need to be first passed by a two-thirds vote of all members in parliament and then approved in a national referendum, while in Bulgaria they must be carried in the National Assembly by a three-quarters majority at least three times, on different days.

In a nation where such a weighty, formal procedure is absent the onus is placed on proposers of change to be absolutely certain in their own minds that there will be no lasting, damaging consequences. Confronted with this responsibility, it is understandable that, in more cases than not, the status quo will be retained and the change cautiously avoided.

This is especially the case in liberal democracies, where constitutional government, government in accordance with formal rules, is most deeply embedded in the public and political psyche. An exception has been France, which has framed 17 constitutions since 1789. Its current Fifth Republic constitution dates back to 1958. It can be amended by the two chambers of parliament meeting together in a special session and the changes attracting 60% support, or by the amendment bill being passed separately by each house of parliament and then approved in a national referendum. Similarly in India, where minor amendments require only the majority support of both chambers of parliament, there have been more than 70 amendments to the constitution since it was first adopted in 1950. This represents almost two amendments a year.

In newer, emergent, or one-party regimes the process of constitution redrafting has been more frequent, with fresh codes being introduced to meet the changed circumstances of the day. The Latin American states, inde-

pendent since the early 19th century, have been particularly prominent in this respect. Venezuela, for example, has had 26 constitutions, though the present one dates back more than 30 years. The Dominican Republic has had 25; Haiti more than 20; Colombia and Ecuador 17 apiece; El Salvador and Bolivia 16 apiece; Honduras 12; and Brazil 7. Asian and African states subject to frequent military coups are also notable for the number of their constitutions. The most extreme case is Thailand, which has had 16 constitutions since the establishment of a constitutional monarchy. Similarly, in communist regimes new constitutions were regularly framed as a means of giving recognition to the advancing stages of 'socialist development' that had been attained. The Soviet Union had five such documents, in 1918, 1922, 1936, 1977, and 1989, after the Revolution of 1917. Yugoslavia had a similar number after the federal republic was first established in 1945, while Czechoslovakia and Romania each had three.

## 2.6 Separation or fusion of powers

We have already said that the main area of concern of a codified constitution will be the three main institutions of government: the legislature, the executive, and the judiciary. A comparison of constitutions could attempt to discover whether these institutions are kept separate or are fused.

The best known proponent of the doctrine of the separation of powers was the French philosopher, Baron Montesquieu (1689–1755), who set out the theory in *De l'Esprit des lois* (1748). He argued that by keeping the three institutions separate and balanced the possibility of one of them, and particularly the executive, accruing undue power, and then exploiting it to the detriment of the citizenship, would be avoided.

His views made a considerable impact and were clearly taken into account by the framers of the United States Constitution. As one of them, James Madison (1751–1836), said: 'the accumulation of all powers, legislative, executive and judiciary, in the same hands ... may justly be pronounced the very definition of tyranny'. Oddly enough, Montesquieu cited England as a country enjoying relatively great liberty because the powers of government were distributed between the legislative, executive, and judicial institutions and had the effect of balancing each other. In reality, as will be seen later, a political system based on a parliamentary

executive, as in the United Kingdom, creates a fusion, rather than a separation, of the legislative and executive functions.

The concept of a separation or balancing of powers is still a useful test of the degree of freedom from autocratic rule within a political system but, on its own, is an insufficient, and sometimes unreliable, criterion.

## 2.7 Unitary or federal states

A constitution invariably seeks to clarify the relationship between the government with the responsibility for the whole of a state's territory and that concerned with only part of it; in other words, to draw distinctions between central government and localized government.

Democratic government is believed to have begun in the city-states of ancient Greece, and particularly the city of Athens, which, with a total population of less than 50,000, was able to practise direct and universal participation in government. In fact the very word democracy (*demokratia*), roughly meaning rule (*kratos*) by the people (*demos*), is derived from ancient Greece. In that situation democracy was direct, involving the active and personal participation of all adult 'full citizens' at some time in their lives in government, by accepting office on a rota basis. Citizens' assemblies met around 40 times a year, being attended by around 5,000 people, while morning councils met even more frequently. There are still vestiges of direct democracy in those contemporary states which make use of juries in their judicial systems and more generally, as is noted in Chapter 6, in the increasing resort to regular referenda and 'citizens' initiatives' in a number of West European nations and US states.

Today, of course, there are few, and no major, states small enough to enjoy direct democracy. The unusual, and almost unique, example of the tiny Most Serene Republic of San Marino in Italy has already been noted. Elements of direct democracy also survive in several of the smaller cantons (states) in the Swiss Confederation, with the electorate, numbering, at most, 10,000, meeting in a public place on one day each year to select officials and vote on issues. This tradition of direct Swiss democracy via the annual *Landsgemeinde*, or sovereign citizens' assembly, is more than seven centuries old, originating in 1294 in the German-speaking canton of Schwyz. These cases are, of course, anachronisms and, although there are suggestions that computerization may, in the future, open up the possibility of a new

direct participatory democracy via the Internet, the vast majority of states which claim to be democratic do so on the basis of representative, rather than direct, democracy.

Putting exceptions such as San Marino and the Swiss cantons aside, all modern states find it necessary to have institutions to administer the needs of particular localities as well as the whole population. The larger the area the more obvious the need to cater to local, or regional, as well as national interests. The extent to which power is devolved by the government in the center to the localities, and the nature of the power devolved, indicate whether or not a genuinely federal system is operating.

A nation-state is one which claims sovereignty over the whole of its territory. In other words, everyone within its boundaries is subject to its laws. If a government decides to divide its sovereignty within its boundaries and pass some of it to local bodies, it means the devolution of some of its law-making powers. If the central government retains the right to override these devolved powers at any time, then the state cannot be said to be truly federal.

If a federal system is adopted the respective legislative powers of the governments in the center and the localities must be clearly defined, and the local governments must be protected against the erosion of those powers by central government. This can only be done successfully through the medium of a written, codified constitution. Because circumstances change, there must be provision for this distribution of legislative power to be reviewed. In a truly federal system that review cannot be undertaken arbitrarily by the central government and the process must involve the localities, either by giving them 'blocking' powers with respect to proposed constitutional amendments in their areas of concern or through the adjudicatory medium of an impartial constitutional court.

The supreme example of a genuinely federal system of government is found in the United States Constitution. Section 8 of Article I sets out the powers of the central legislature, Congress, and, by implication, leaves the residue of powers to the state legislatures. Article V prescribes how the Constitution can be amended, such amendments requiring the approval of three-quarters of the state legislatures, and Article III the adjudicatory authority of the Supreme Court.

This form of devolution is effected by prescribing the legislative powers of the center and leaving the residue with the localities. An alternative method is to prescribe

the powers of the localities and leave the residue to the center. Virtually all the world's federal systems adopt the former approach although the Canadian constitution comes nearer to the latter, defining precisely the powers of both the federal and state governments.

When executive, rather than legislative, powers are decentralized a state is said to have a unitary constitution. Of the 192 states in Table 1 the great majority are unitary, only 24 having federal structures. As with most other aspects of political systems, history, geography, and culture are the strongest factors behind the choice of a federal system of government. Of particular importance, not surprisingly, is country size, with seven of the eight largest nations in the world, and five of the seven most populous, having federal structures. Moreover, the one exception within this grouping, China, has established five 'autonomous regions' for its non-Han minority border communities, which are of quasi-federal nature. It is for this reason that, despite their small numbers, more than 2 billion people, constituting 38% of the world's population, live in states with federal constitutions, and these 24 states comprise half the world's land area. There are federal states in all nine regions of the world, but the largest number are to be found in the Americas (7), Europe (7), and Africa (5). The broad range of factors that have determined the existence of federal structures in these and the remaining five states are presented in Table 6, together with a brief exposition of the types of federal system in operation.

Table 6 excludes Somalia where, in 1993, an agreement was reached to establish a federal system of government, based on 18 autonomous regions. However, the country has been beset by civil war since the late 1980s. This has prevented the agreement from being made effective. Indeed, one large region, Somaliland in the northwest, has been a self-declared 'independent state' since May 1991. There have been recent proposals to establish a federation in Sri Lanka, while in Madagascar a constitutional amendment to set up a federal system was approved in a March 1998 referendum. South Africa is another possible candidate for a federal system.

As Table 6 suggests, federalism is stronger in some countries than others, the most vigorous being Australia, Canada, Switzerland, and the United States, with India and Germany following closely behind. In Germany a strong federal system was actively sponsored by the occupying powers after the end of World War II because of fears of a resurgence of a powerful

and belligerent nationalistic central government. The weakest examples of federal systems are probably the Comoros, where most legislative power is retained by the Federal Assembly, and Austria. The Mexican, Russian, Venezuelan, and Malaysian federal systems are also weak in practice as a result of the *de facto* control exerted over state/regional associates by the federal party leadership and machine.

Federal systems have been established in some states, notably Belgium, Bosnia, Ethiopia, Nigeria, Sudan, and Yugoslavia, to accommodate the political aspirations of regionally based ethnic communities which would otherwise seek secession from the state. In practice, the federal solution has not always proved sufficient to assuage secessionist movements. As a consequence the federal unions of the USSR, greater Yugoslavia, and Czechoslovakia collapsed between 1991 and 1992 and Cameroon abandoned its federal structure in 1972. Meanwhile, Bosnia, Canada, Comoros, St Kitts and Nevis, Ethiopia, India, Mexico, Nigeria, Pakistan, the Russian Federation, Sudan, and Yugoslavia all currently face regionally based secessionist and 'home rule' movements of varying strengths.

Other states which are not strictly federal but have 'highly decentralized' forms of government, are identified in Table 7. During the past two decades there has been a general trend towards political decentralization, entailing the establishment of elected regional governments with enhanced responsibilities and sources of finance. This has been particularly apparent in Western Europe in France, Italy, the United Kingdom (since 1997), and, to the greatest degree, Spain. As a consequence the distinction between 'weak federal' states such as Austria and 'strongly decentralized' states such as Spain is now quite narrow. Indeed, it is noted by Daniel Elazar, who has compiled a handbook of federal and federal-style states, that: 'Nearly 80 per cent of the world's population now live within polities that either are formally federal or that utilize federal arrangements in some way, while only 20 per cent live in polities that can be denominated as outside of any federal arrangements.'

## 2.8 The distribution of power

Whatever safeguards may be written into a constitution, political realities will ultimately determine the distribution of power between the center and the localities, and the most significant reality is, invariably, a financial one.

## Federal states in the contemporary world

Table 6

## Chief determinants of federalism and its form\*

**Argentina** (S America) pop. 34.2 m (WR 31) area 2.767 m sq km/1.068 m sq miles (WR 8)

*historical, cultural, and geographical*

Early history was dominated by a conflict between town and country, particularly the European-style sophistication of Buenos Aires and the rough, basic style of the gaucho. An attempt to impose a unitary system in 1829 failed. There are today 22 provinces, each with its own legislature, governor, and constitution. The five-member Supreme Court adjudges federal–state constitutional conflicts.

**Australia** (Oceania) pop. 18.4 m (WR 49) area 7.687 m sq km/2.968 m sq miles (WR 6)

*geographical and historical*

The size of the country and distribution of the population have created distinctive, separate communities. For example, both Darwin, in the north, and Perth, in the west, are more than 3,000 km from the capital, Canberra, whereas the two largest cities, Sydney and Melbourne, are, respectively, less than 300 and 500 km away. Historically, throughout the 19th century the country was divided into six distinct colonies, founded separately, governed separately, and bounded by largely uninhabited land. Not until 1901 did the colonies unite in the Commonwealth of Australia. The six states have their own legislatures and constitutions, with, still today, 60% of the nation's population residing in their capitals. They receive the bulk of their funds from the center, which has authority to levy income tax, in the form of annually negotiated grants. Federal–state conflicts are ruled upon by the seven-member Australian High Court.

**Austria** (N & W Europe) pop. 8.0 m (WR 85) area 0.084 m sq km/0.032 m sq miles (WR 112)

*partly historical and partly artificial*

A weak federal system which had operated between the two World Wars was revived, under United States influence, in 1945. There are nine states (Länder), each with its own legislature. The policy-framing powers residing with the state governments are, however, limited to the spheres of regional planning, agriculture, hospitals, and electricity. Federal–state disputes are adjudged by the 14-member Constitutional Court.

**Belgium** (N & W Europe) pop. 10.1 m (WR 74) area 0.031 m sq km/0.012 m sq miles (WR 136)

*cultural and linguistic*

The northern people are mainly Flemings, of Teutonic stock, speaking Flemish, while those of the south are chiefly Walloons, of Latin stock, speaking French, while the capital, Brussels, has a mixed, cosmopolitan population. From 1980 northern Flanders and southern Wallonia had regional 'sub-governments', then in 1993 the constitution was amended to create a federation of three, mainly autonomous, regions, Brussels, Flanders, and Wallonia.

**Bosnia-Herzegovina** (C, E, & S Europe) pop. 3.6 m (WR 120) area 0.051 m sq km/0.020 m sq miles (WR 124)

*historical, ethnic, and cultural*

The state is one of the remaining pieces of the former multi-ethnic federal Yugoslavia. Following the refusal of the Serbs to accept Muslim-Croat-Serb power-sharing, the Muslim and Croat leaders agreed in 1994 to form a federation of eight cantons, each with a significant degree of local autonomy. A new Muslim-Croat and Serb federation was agreed in 1995.

**Brazil** (S America) pop. 153.7 m (WR 5) area 8.512 m sq km/3.287 m sq miles (WR 5)

*geographical and cultural*

The size of the country and distribution of the population favored federalism. The land mass is greater than continental United States, minus Alaska. Each of the 26 states has a single chamber assembly, elected governor, and constitution. In addition, Brasília is a federal district. There is a 16-member Supreme Court to decide on federal–state conflicts. The body is viewed, however, as strongly susceptible to presidential influence. The new constitution, adopted in 1988, enhanced states' powers and their tax-raising capabilities vis-à-vis the federal government, so that half of the federal tax take is now devolved further down the line. This strengthened what was previously a comparatively weak federal system.

**Canada** (N America) pop. 29.4 m (WR 33) area 9.971 m sq km/3.850 m sq miles (WR 2)

*geographical, historical, and cultural*

The size of the country and the wide cultural mix created strong regional differences. Historically, the nation was created by the confederation of four British colonies in 1867. Six other former colonies joined the Dominion between 1870 and 1949. The ten resulting provinces have their own assemblies and elected premiers. They can frame their own civil laws and have control of education policy. The nine-member Supreme Court rules on federal–state constitutional disputes.

*continues*

**Federal states in the contemporary world****Table 6**

**The Comoros** (C & S Africa) pop. 0.6 m (WR 155) area 0.002 m sq km/0.0008 m sq miles (WR 167)

*geographical and historical*

This state is a group of three islands which came together. Each island has its own elected governor and island assembly, with partial administrative and legislative autonomy.

**Ethiopia** (C & S Africa) pop. 54.9 m (WR 22) area 1.106 m sq km/0.427 m sq miles (WR 26)

*historical, cultural, and ethnic*

In recognition of the country's ethnic and cultural diversity, in 1952 it became a federation but returned to unitary status in 1962. With the secession of Eritrea, and the acceptance that other regions might seek similar independence, in 1994 the country returned to federalism, based on nine ethnically distinct states, each with a significant degree of autonomy. In making the change, the constitution unusually gave any state the right to secede through a popular referendum.

**Germany** (N & W Europe) pop. 81.4 m (WR 12) area 0.357 m sq km /0.138 m sq miles (WR 61)

*historical and partly artificial*

The Weimar Republic, carrying on earlier German Empire traditions, had a weak form of federalism which was destroyed by the Hitler regime. Under United States' influence it was revived in 1945, as a means of providing a check against the possible future abuse of central authority. With unification of the West and East, in 1990, the federal structure was retained. There are 16 states (Länder), each with its own constitution, elected assembly and government headed by a minister-president, and substantial-sized civil service. The states have original powers in education, police, and local government matters and substantial local tax-raising powers, and receive assigned shares of federal revenue accruing from value-added tax (VAT) and income tax. They are responsible for carrying out the administration of federal matters and account for a half of total government spending in the federal republic. Federal-state disputes are policed by an independent 16-member Federal Constitutional Court. In practice, however, German federalism is largely consensual in character, based around the striking of pragmatic committee-room deals between senior federal and state politicians and civil servants. For this reason, the term 'bureaucratic federalism' is frequently employed to describe the German federal system.

**India** (Asia) pop. 918.6 m (WR 2) area 3.287 m sq km/1.268 m sq miles (WR 7)

*geographical, historical, and cultural*

The land mass makes it the second largest state in Asia and historically the country was apportioned during the British period into separate provinces, with specified areas of legislative and fiscal autonomy, and princely states, each owing separate allegiance to the Crown. Today there are 25 self-governing states, organized primarily on language lines, and seven 'Union territories'. Each state has its own elected assembly, council of ministers, and chief minister. There is also a figurehead governor appointed by the federal president. The states have primary control over health, agriculture, education, police, and local government. Overall, however, although relatively strong in comparative terms, particularly when non-Congress parties control state assemblies, Indian federalism remains weighted towards the federal government, which has sole control of income tax, the states relying on land and sale taxes and federal grants for their revenue. The government at the center also has the power to impose direct 'President's Rule' in any state during a period of turmoil. A substantially independent 18-member Supreme Court adjudges federal-state constitutional conflicts.

**Malaysia** (Asia) pop. 20.1 m (WR 46) area 0.330 m sq km/0.127 m sq miles (WR 64)

*historical and cultural*

The country is a federation of 11 separate states and two British colonies which were brought together into a federation between 1963 and 1965. Each state has its own constitution, elected assembly, led by a chief minister and cabinet, and head of state. The states, however, have only limited original powers in the spheres of land and natural-resource management and are reliant upon the federal government for almost all of their funds. Federal-state constitutional disputes are ruled upon by a traditionally independent Supreme Court. This has, however, been subject to mounting central political pressure, exerted by the prime minister and monarch, during recent years.

**Mexico** (C America & Caribbean) pop. 93.0 m (WR 11) area 1.958 m sq km 0.756 m sq miles (WR 14)

*geographical and partly imitative*

The size of the country made a federal system sensible in geographical terms and also the United States' constitution was seen as an attractive model to copy. The 31 states have their own elected Chamber of Deputies, governors, and constitutions. In most states most powers reside with the governor who is pre-selected by the dominant Institutional Revolutionary Party's (PRI) inner-council. For this reason, Mexico remains, in practical terms, a significantly centralized state. For similar reasons, the Supreme Court is subject to effective PRI control.

*continues*

**Federal states in the contemporary world****Table 6**

**Micronesia, Federated States of** (Oceania) pop. 0.104 m (WR 176) area 0.0007 m sq km/0.0003 m sq miles (WR 172 )

*geographical and historical*

The dispersed nature of the state, consisting of hundreds of islands, mostly uninhabited, scattered across the South Pacific, meant a political federation was inevitable. The federation consists of four states, each with its own constitution, providing for a governor and legislature. Each state enjoys considerable freedom under a federal executive president who coordinates and directs policy.

**Nigeria** (C & S Africa) pop. 108.5 m (WR 10) area 0.924 m sq km/0.357 m sq miles (WR 31)

*geographical, historical, and cultural*

The recognition of tribal and religious differences, particularly between the north and southeast, which culminated in civil war between 1967 and 1970, has been made in a federal system. Prior to independence, Nigeria was divided, in accordance with the 1946 'Richards constitution', into three semi-autonomous regions. These became four in 1963, 12 in 1967, 19 in 1979, 21 in 1987, and 36 in 1993. There is also the Federal Capital Territory. At present, each state is under the control of a military governor appointed by the central Armed Forces Ruling Council.

**Pakistan** (Asia) pop. 126.6 m (WR 7) area 0.796 m sq km/0.307 m sq miles (WR 35)

*historical and cultural*

The absorption of 12 princely states into independent Pakistan in 1948 was achieved by recognizing their earlier history and creating a federal structure of four provinces. These provinces exhibit strong cultural and ethnic distinctions and rivalries. They are administered by centrally appointed governors and local governments drawn from elected provincial assemblies.

**Russian Federation** (C, E, & S Europe) pop. 148.0 m (WR 6) area 17.075 m sq km/6.593 m sq miles (WR 1)

*historical, geographical, and cultural*

The federal system was established by the Soviet Union in 1922, allowing national minorities to be recognized while maintaining the unity of the state through the party machine. The Russian Federation now includes 21 republics. Sixteen of them were autonomous republics during the communist period, four were formerly autonomous regions (oblasts), while the last, the Ingushetia republic, was newly created in 1992. The unit called Russia comprises those parts of the Russian Federation that are not included within any of the other 21 republics and, with five-sixths of the Federation's total population, is divided into 68 administrative regions (oblasts and krais) and autonomous territories and districts, which have considerable devolved authority. The republics have, in theory, a free hand in the welfare and social spheres, as well as the right of secession but this freedom is sometimes overridden in practice.

**St Kitts (Christopher) and Nevis** (C America & Caribbean) pop. 0.041 m (WR 185) area 0.0003 m sq km/0.0001 m sq miles (WR 185)

*geographical and historical*

The state is a unique union of two islands which are the residue of what was to have been a wider West Indies federation. Nevis Island, with its own elected assembly, prime minister, and cabinet, retains the option to secede.

**Sudan** (C & S Africa) pop. 28.9 m (WR 34) area 2.506 m sq km/0.016 m sq miles (WR 10)

*geographical and cultural*

In recognition of the country's geographical and cultural diversity, in 1994 a federation of 26 states was created, each with its own governor, assisted by state ministers, appointed by the federal president. However, with the military still powerful, the durability of this constitutional arrangement must be in doubt.

**Switzerland** (N & W Europe) pop. 7.0 m (WR 91) area 0.041 m sq km/0.016 m sq miles (WR 131)

*historical and cultural*

The state is a federation of 26 cantons (including six half-cantons), or political units, dating back to the late 13th century. The cantons also reflect the cultural diversity of a country divided between German-, French-, Italian-, and Romansch-speaking communities and between Catholic majority and Protestant majority areas. Each canton has its own constitution, legislative assembly, and government, with substantial powers in socio-economic spheres such as education, environmental issues, tourism, transport, and police affairs. Cantons also have protected sources of finance and the ability, through the successful use of referenda, to effectively veto federal policies.

**United Arab Emirates** (M East & N Africa) pop. 2.4 m (WR 134) area 0.084 m sq km/0.032 m sq miles (WR 113)

*historical*

This is a loose federation of seven sheikhdoms which were under British protection between 1892 and 1971. Each sheikh is an hereditary and absolute ruler in his own emirate.

*continues*

## Federal states in the contemporary world

Table 6

**United States** (N America) pop. 265.3 m (WR 3) area 9.373 m sq km/3.619 m sq miles (WR 4)

*historical and geographical*

The federal system resulted from the voluntary coming together of the original 13 British colonies after the War of Independence (1776-83). The state developed by expanding its federal membership and the structure also usefully recognizes the geographical and cultural diversity of the country. Each of the 50 states that presently exist has its own constitution, assembly, elected governor, and supreme court. The federal government has responsibility for defense and foreign affairs and the authority to coordinate 'inter-state concerns'. A liberal interpretation of what the latter phrase might constitute has resulted in a steady expansion in federal government interests. State governments remain, however, influential bodies, framing much of their own civil and criminal law; being substantially involved in health, educational, and welfare affairs; and raising more than three-quarters of their funds from state property sales and, in some cases, local income taxes. Federal-state constitutional disputes are adjudged by the independent nine-member Supreme Court.

**Venezuela** (S America) pop. 21.2 m (WR 44) area 0.912 m sq km/0.352 m sq miles (WR 32)

*historical, cultural, and imitative*

The federal system recognizes the historical and cultural differences in the country but also reflects admiration for the US model, the country having been called the United States of Venezuela until 1953. It is divided into 22 states (estados), each with its own elected assembly and executive governor. Since, however, the governor is appointed by the federal president and the states are heavily dependent upon the center for revenue resources, the federal system remains weak in practice. The adjudicatory supreme court is heavily susceptible to political influence.

**Yugoslavia** (C, E, & S Europe) pop. 10.5 m (WR 67) area 0.102 m sq km/0.039 m sq miles (WR 106)

*historical and cultural*

Formerly a socialist federation of six republics, following the breakaway of Slovenia, Croatia, Bosnia-Herzegovina, and Macedonia in 1991-92, a new constitution was adopted in 1992 for the 'rump federation' of the republics of Serbia and Montenegro, the federal structure recognizing the historical independence of the different national minorities and religious groupings. The present federal republic consists of the two republics of Montenegro and Serbia and, within Serbia, the autonomous provinces of Vojvodina and Kosovo-Metohija. Each republic and autonomous province has its own elected assembly, although the Kosovo assembly was dissolved in 1990 by the government of the republic of Serbia. Within each republic and province there are locally elected councils. There is a Constitutional Court to adjudge federal-state disputes.

\* In brackets are the world rankings (WR) of these states in terms of population and area.

In Australia, for example, the states are dependent on the federal government for about 60% of their revenue, and even in the United States, where the clearest distinction between central and local power is made, the states rely on indirect sales taxes which are much less buoyant and stable than the direct income tax which forms the bulk of federal government revenue.

At the other extreme, in a unitary state such as the United Kingdom local authorities are entirely the creatures of parliament, which is controlled by the party in power, and dependent on central government not only for the bulk of their income but for their very existence. The abolition, in 1986, of a whole tier of local government, the metropolitan county councils, including the Greater London Council (GLC), is evidence of the disproportionate distribution of power in the United Kingdom. However, the creation in 1998 and 1999 of new assemblies in Wales and Northern Ireland, a Scottish parliament, and legislation to restore a London

council with, for the first time, an elected mayor, has begun to redress this balance of power.

## 2.9 The role of the judiciary

Most constitutions speak, directly or indirectly, about the supremacy of law. This is generally seen as the guarantee of personal liberty and the chief protection against the overweening power of the state. Clearly the law of the land is the law enacted, and whether or not the laws which are passed are fair is a matter which the political system, as a dynamic entity, must determine.

However, once a law has been enacted it is the role of the judiciary to ensure that it is fairly enforced, and in practice this means more than just adjudicating in disputes between individuals and groups or between them and the state. It also involves interpreting the law. Since it is virtually impossible to construct a law which is

Unitary states with decentralized features

Table 7

State	Form of decentralization
Bolivia	9 departments with appointed prefects
Burkina Faso	25 provinces
Burma	14 states and divisions
China	21 provinces, the Hong Kong Special Administrative Region (SAR), and five 'autonomous regions', including Tibet (see Part III)
Denmark	mainland, Faroe Islands and Greenland (see Part III) are administered separately and all are represented in the single chamber Folketing
Dominican Republic	31 provinces
Ecuador	21 provinces
Finland	Åland Islands are a self-governing province
France	22 elected regional councils, influential in the economic planning process, and 96 department councils. Corsica (see Part III) has its own assembly
Georgia	2 autonomous republics: Abkhazia and Adzharia
Haiti	9 departments
Indonesia	24 provinces, a metropolitan district, and two autonomous districts, each with a governor
Israel	since 1993, Palestinians living in the occupied territories of Gaza and the West Bank of the Jordan have enjoyed partial autonomy
Italy	20 regions with elected councils; five enjoy a 'special status'
Kiribati	elected councils on each inhabited island, enjoying considerable autonomy
Moldova	the Gagauz and Dnestr regions have special autonomous status
Netherlands	11 provinces with appointed governors and elected councils
Palau (Belau)	16 states, each with an elected legislature and governor
Papua New Guinea	20 provinces with consultative assemblies
Philippines	12 regions and 75 provinces. Muslim Mindanao is an autonomous region
Poland	16 provinces
Portugal	the Azores and Madeira (see Part III) are autonomous regions, each with an elected regional assembly and an appointed chair
San Marino	9 partially self-governing 'castles'
São Tomé e Príncipe	Príncipe has internal autonomy
Senegal	10 regions with appointed governors and elected assemblies
Solomon Islands	7 provincial assemblies
South Africa	9 regions with elected councils.
Spain	17 regional autonomous communities with elected parliaments and governments. Each has the constitutional right to self-rule
Sri Lanka	8 elected provincial councils
Tanzania	Zanzibar has its own constitution and House of Representatives. The state constitution prescribes that when the president comes from the mainland the vice president must come from Zanzibar, and vice versa. There are 25 regional commissioners
Trinidad and Tobago	Tobago Island has its own House of Assembly, with full self-government since 1987
Tuvalu	each inhabited atoll has its own elected Island Council
Ukraine	the Crimea has been afforded a special status
United Kingdom	Channel Islands and their dependencies (see Part III) have their own assemblies and laws. The Isle of Man (see Part III) has its own lieutenant-governor and legislative council. Northern Ireland has an elected assembly and executive since 1998, and there is a Welsh assembly and Scottish parliament, since elections in 1999
Vanuatu	6 elected regional councils
Zambia	each of the 9 provinces is represented on the president's advisory body, the House of Chiefs



completely unequivocal, the task of judicial interpretation is a continual process and of considerable importance. To have an independent and unbiased judiciary is, therefore, vital if personal liberty is to be protected.

Judges are generally guaranteed their independence in a constitution by a provision which ensures their continuance in office during 'good behaviour'. Although independence and security of tenure usually apply to judges in the higher courts, in lower courts this is not always true. In many US states, for example, members of the state judiciary are elected and may be dismissed by the people who elected them. A notable recent example was the California voters' rejection of Chief Justice Rose Bird in November 1986 for alleged 'liberalism' in her conduct of affairs. This makes judicial office holders responsive to public opinion, but is not always the best prescription for justice. In most one-party states, as well as in many Latin American countries, it is the party which chooses the judges for election by the assembly, another process clearly open to abuse.

In the United Kingdom the judiciary is appointed by the government of the day, and although the Lord Chancellor, as the head of the judiciary, provides advice, to ensure the quality of the appointees and, in theory at least, to avoid political bias, it should not be forgotten that Lord Chancellors are politicians and leading members of the government. The Law Lords, sitting in the House of Lords, serve as a final court of appeal. As witnessed in their decision in 1999 to approve the extradition of Chile's former dictator, General Pinochet, to Spain to face criminal charges, decisions of the Law Lords can have great political significance. In the United States, Supreme Court judges are appointed, subject to Senate approval, which in recent years has by no means been automatic, by the president and, inevitably, subject to some political influence. Nor is it possible to say that any judge, however qualified and experienced, can be completely free from the bias which stems from his or her own social background and political inclinations.

A constitution can, therefore, go some way towards ensuring an independent judiciary but it can never guarantee complete impartiality. In practice most constitutions go little further than setting out the structure of the judicial system, with a few adding something a little more specific. The constitution of the Republic of Algeria states: 'Judges obey only the law. They defend the socialist revolution', and in Cameroon and Gabon the president is given the task of ensuring the independence of the judiciary.

An important role of judges is, of course, to protect the constitution itself and even in a state, such as the United Kingdom, which has no codified constitution, they are required and expected to uphold the rule of law. In federal states, as has been noted, the judiciary's task of upholding the constitution is particularly significant in that they have to interpret as well as enforce, so as to preserve the intended balance between the center and the localities. In quasi-federal Spain there is a Constitutional Court with this specific task, as there is in Italy and, though the body is somewhat less influential, in France also. The similar top level judicial bodies which exist in fully federal states are set out in Table 6.

### State or established religions Table 8

#### **Islam** (25)

Afghanistan, Algeria, Bahrain, Bangladesh, Brunei, The Comoros, Egypt, Iran, Iraq, Jordan, Kuwait, Malaysia, The Maldives, Mauritania, Mauritius, Morocco, Oman, Pakistan, Qatar, Saudi Arabia, Somalia, Sudan, Tunisia, United Arab Emirates, Yemen

#### **Roman Catholicism** (12)

Argentina\*, Colombia\*, Costa Rica, Dominican Republic, Haiti, Malta, Panama\*, Paraguay\*\*, Peru\*\*, Seychelles\*, Vatican City State, Venezuela\*

#### **Evangelical Lutheran/Protestant Church** (6)

Denmark, England & Scotland, Iceland, Norway, Sweden, Tuvalu

#### **Greek Orthodox Church** (1)

Greece

#### **Judaism** (1)

Israel

#### **Buddhism** (4)

Bhutan, Cambodia, Sri Lanka, Thailand

#### **Hinduism** (1)

Nepal

#### **Pancasila** (1)\*\*\*

Indonesia

\* Quasi-state religion.

\*\* Roman Catholicism is the official religion, although the constitution guarantees religious freedom.

\*\*\* A national secular-state ideology, stressing unity and social justice, which is a compulsory belief for all social organizations.

## 2.10 Religion and the state

Some states have adopted a particular belief as the national religion and enshrined this in their constitutions. Table 8 sets out the current established or state religions. In all, 51 states fall into this category, almost half of which have Islam as the state religion. Fourteen of the states where Islam is established as the state religion are situated in the Middle East and North Africa, six in Asia, and five in Central and Southern Africa. Roman Catholicism is the second most widely officially established religion, with a strong regional bias towards Central and South America.

## 2.11 Unusual constitutional features

Some constitutions contain unusual or unique provisions, most of them being products of the country's history, geography, or social structure.

The Mexican constitution, reflecting the country's history of exploitation by the wealthy and powerful, places restrictions on the activities of the Church, large landowners, and foreign organizations. Following a record of unequal educational opportunities, the constitution also stresses the importance attached to state education. In similar vein, the 1992 constitution of Paraguay provides for agrarian reform in its Chapter 6, but also guarantees the autonomy of the army.

Because of the small size of the country, the constitution of Nauru permits the president, who combines the roles of head of state and head of government, to take on additional ministerial portfolios himself in a cabinet of only five or six.

To ensure a balance between the religious communities, the Lebanese constitution prescribes that if the president is a Christian the prime minister must be a Muslim, and vice versa.

The constitution of South Africa specifies that parties which secure at least 5% of the national vote are entitled to a proportionate number of ministerial portfolios, while the constitution of Mongolia specifically permits the imposition of forced labor.

The different geographical bases required of the president and vice president by the Tanzanian constitution have already been mentioned.

Finally, the newest Brazilian constitution, whose 245

articles and 70 clauses took 19 months to be scrutinized and approved by the federal Congress, contains the most detailed statement of specific social and economic rights currently in force in a noncommunist regime. These include a prescribed 44 hours for the working week and stipulated rights to five days of paternity leave and extended maternity leave.

In terms of length, currently two of the world's longest constitutions are those of India (1950), which contains 397 articles and nine schedules, and Colombia (1991), which has 380 articles.

## 2.12 How important are constitutions?

Are constitutions merely statements of a grand design and, as such, removed from the realities of the political process? In the final analysis surely naked, military power must prevail? The answers to these questions, based on recent experience, must be yes and no.

In liberal democratic countries with long established codified constitutions, such as the United States, there can be no doubt about their supreme significance. The content and importance of the American Constitution are made clear to every school child and the newest immigrants will cherish the freedoms it proclaims. Specific provisions are frequently quoted in contemporary life. Both Rear Admiral John Poindexter and Lieutenant-Colonel Oliver North pleaded the Fifth Amendment, the right to remain silent in a criminal case, when required to testify at the 1986 'Irangate' hearings. With the Watergate and Monica Lewinsky affairs, all Americans must be aware of the impeachment powers contained in Articles I-II of the Constitution.

Even in a country such as the United Kingdom, with an uncoded constitution, constitutional controversies arise over such matters as the powers of the House of Lords, devolution, parliamentary sovereignty vis-à-vis the European Union, electoral reform, and the possibility of introducing a Bill of Rights.

Admittedly, given the necessary political will and military might, any constitution can be suspended or annulled, and at the present time there are about ten which fall into this category. Nevertheless, the aura of legitimacy which, accurately or not, a constitution brings is almost universally sought, even by clearly despotic regimes.

## Recommended reading

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# The Ideological Bases

## 3.1 The nature of ideology

We are now entering the treacherous world of ideologies where we are as likely to be misled as informed. Nevertheless, it is an area which must be explored if we are to make distinctions between political systems looking not just at their institutional bases but, much more deeply, at the cultures and attitudes which have shaped them.

It is not particularly important to the ordinary citizen that there is a two-chamber assembly or that the head of state is a king or a president. But whether the economy is planned from the center or left to market forces, or whether there is a choice of political parties to support or only one, is important to the individual citizen.

Identifying the ideology on which a political system is based, or influenced by, will help us penetrate the façade of institutions and slogans, but we must first clarify what we mean by ideology.

It is generally recognized that the political system of the Soviet Union had its theoretical beginning in the writings of Karl Marx (1818–83) and Friedrich Engels (1820–95), subsequently developed and adapted by Vladimir Ilyich Lenin (1870–1924), and that the current regime in Iran is motivated by the religion of Islam, through its Shi'ite branch, but what about the system in the United Kingdom? Is it not too evolutionary and pragmatic to have any substantial theoretical or philosophical basis?

It depends on how we construe ideology. 'Ideology' is a much abused and overused word. In recent years it has, more often than not, been associated with zealots and fanatics. The spread of international terrorism has built up a picture of ruthless groups imbued with a single-mindedness which rejects customary morality so as to advance the aims of some particular ideology. An ideology has too often come to mean blind faith and irrationality. This is too narrow an interpretation, and indeed a distortion, of the word.

The definition which will be used for our purposes is one which might be found in any good, general dictionary. An ideology is a body of ideas which reflects the

beliefs and values of a nation and its political system. Such a definition is wide enough to encompass a variety of political cultures, from the mature, rational attitudes to be found in many states in what we call the West, to the more inspirational, and often emotive, ideas found in countries with less experienced political systems.

Ideologies can be individually or socially inspired. More often than not they are both. Politicians are essentially doers rather than thinkers, even though some of them would have the public believe they are both. They adopt and use philosophies as a platform for political action.

But why and how does a philosophy eventually become so much a part of the beliefs and values of a country that it can be said to be the ideology on which its political system is based? Initially, it usually results from a revolution of one kind or another and then proceeds through a process of what might be called evolutionary absorption.

For example, the '*ancien régime*' of 17th- and 18th-century France was ended abruptly by the Revolution of 1789. Opposition to the profligacy and inequity of the absolute monarchy, allied to the democratic message of the 'Enlightenment' philosophers and writers such as Jean-Jacques Rousseau (1712–78), brought about the dramatic change. Then, over a much longer period, the forces which had initially impelled the revolution were modified and absorbed into the French psyche so as to become the ideology which now underlies its political system.

Other writers, such as John Stuart Mill (1806–73) in England, expanded and amended Rousseau's concept of liberal democracy into a more practical idea of representative government, while in other countries French and British experience was adapted to suit differing social and political needs. Thus, liberal democracy became the ideology of a wide family of nations.

The inequities of the Tsarist regime in Russia also ended abruptly in the Revolution of 1917, with, again, practical discontent allying itself with theoretical justification through the writings of Marx and Engels and the 'praxis' of Lenin. The communist ideology of the

Soviet Union was, over the years, adopted and modified by another, mixed family of nations. Then, in the later 1980s, the inequities and inefficiency of the Soviet style of communism, with its emphasis on the command economy and the repression of individual thought, became apparent and produced another revolution, not entirely bloodless, but less violent than many might have anticipated.

In attempting to identify different ideologies and relate them to individual nation-states we realize that the choices are necessarily somewhat arbitrary and, indeed, a purist might well argue that each nation has its own unique ideology and that any classification is misleading. We reject this argument because we believe that, if accepted, the very notion of comparative politics would be questionable and a study such as this would have to be abandoned. Thus, accepting the arbitrary nature of the choice, an eightfold grouping is offered, in the belief that any classification is preferable to none at all. At the same time, some of the deficiencies in the process should be noted.

The first is that the ideology associated with particular countries is, inevitably, a 'broad brush' description of something more subtle and complicated than the simple 'label' would suggest. The second defect is that a static situation has been assumed. This may be acceptable as far as long-established states, with stable political systems, are concerned, but less so for newer states whose systems are still in flux. Where such conditions are believed to exist an appropriate caveat will be added, with several countries, notably Afghanistan, Bosnia-Herzegovina, Liberia, and Somalia, currently in transition.

With the foregoing reservations, the following ideologies will be identified and used:

1. Liberal democracy;
2. Emergent democracy;
3. Communism;
4. Nationalistic socialism;
5. Authoritarian nationalism;
6. Military authoritarianism;
7. Islamic nationalism;
8. Absolutism.

A possible ninth new ideology, that of political Populism, began also to emerge during the 1990s. It is characterized by an emphasis on charismatic individual leadership, rather than politics based around party machines; skilful use of the television media; direct appeals to the populace via frequent referenda; anti-

establishment rhetoric; mobilization on ethnic or nationalist lines; and, in the economic and social spheres, the offering of 'simple solutions to complicated problems'. Populism's roots lie in the Midwest-based People's Party, formed by agrarian interests, which was a force in US politics during the 1890s. A century later, its standard bearers have included: the maverick billionaire H Ross Perot, who contested the US presidential elections of 1992 and 1996 as an independent; the Reform Party in Canada; the media tycoon Silvio Berlusconi, who briefly became prime minister in Italy in 1994; the ultra-nationalist xenophobe Vladimir Zhirinovskiy, whose Liberal Democrats attracted nearly a quarter of the national vote in Russia's December 1993 parliamentary elections; Alexander Lukashenko, who was elected President of Belarus in July 1994; and Hugo Chavez, who was elected president of Venezuela in December 1998. Populism has begun to put down roots most firmly in those states recently freed from communist monism which are finding the transition to a competitive market economy and multiparty liberal democracy particularly painful and difficult. However, it is currently not sufficiently established as an ideological base to merit inclusion in this volume as a ninth category.

### 3.2 Liberal democracy

Liberal democracy is a product of two concepts: the right to representative government and the right to enjoy individual freedom. The term 'liberal' is derived from the first concept and 'democracy' from the second. The tests for a political system claiming to be based on this philosophy would, therefore, seem to be the extent to which the government truly represents the mass of the people and the extent to which individuals' rights are protected.

In practice the essential features of a liberal democratic system can be identified as:

1. Representative institutions based on majority rule, through free elections and a choice of political parties;
2. Limitations on the power of government, implying a pluralistic society in which the state is not all-embracing and exists alongside other, sometimes competing, interests;
3. Accountability of the government to the electorate;
4. Freedom of expression and assembly, and personal freedom, guaranteed by an independent judiciary;
5. A skilled and impartial permanent public service

Regional distribution of political regimes

Table 9

Regime	Region									Total
	Asia	Central America & Caribbean	Central, Eastern, & Southern Europe	Central & Southern Africa	Middle East & North Africa	North America	Northern & Western Europe	Oceania	South America	
Lib-dem	5	17	3	2	2	2	21	13	9	74
Em-dem	10	3	19	30	4	0	1	1	3	71
Communist	4	1	0	0	0	0	0	0	0	5
Nat-soc	0	0	0	4	4	0	0	0	0	8
Auth-nat	5	0	3	4	0	0	0	0	0	12
Military	1	0	0	7	0	0	0	0	0	8
Islam-nat	1	0	0	0	1	0	0	0	0	2
Absolutist	2	0	0	1	7	0	1	1	0	12
<i>Total</i>	<i>28</i>	<i>21</i>	<i>25</i>	<i>48</i>	<i>18</i>	<i>2</i>	<i>23</i>	<i>15</i>	<i>12</i>	<i>192</i>

Combined area, population, and GDP (c. 1995)

Regime	Area (million sq km)	Population (millions)	GDP (US \$'000 m)	(% share of world total)		
				Area	Population	GDP
Lib-dem	57.0	2,405	23,855	42.9	42.7	86.2
Em-dem	45.2	1,479	2,303	34.0	26.3	8.3
Communist	10.4	1,327	940	7.8	23.5	3.4
Nat-soc	3.6	73	102	2.7	1.3	0.4
Auth-nat	4.4	99	85	3.3	1.8	0.3
Military	7.5	142	50	5.6	2.5	0.2
Islam-nat	2.3	78	85	1.7	1.4	0.3
Absolutist	2.6	33	240	2.0	0.5	0.9
<i>Total</i>	<i>133.0</i>	<i>5,636</i>	<i>27,660</i>	<i>100.0</i>	<i>100.0</i>	<i>100.0</i>

Lib-dem	Liberal democratic
Em-dem	Emergent democratic
Nat-soc	Nationalistic socialist
Auth-nat	Authoritarian nationalist
Islam-nat	Islamic nationalist
GDP	Gross domestic product

responsible to the government of the day and, through it, to the electorate.

Of the 192 states under examination 74 have been identified as having political systems founded on liberal democracy and they are listed in Table 11. They embrace 2.4 billion people, a figure which corresponds

to 43% of the world's total population. The oldest and most stable liberal democracies are to be found in Northern and Western Europe, but by no means all, or even a majority, because, although its roots are European, it is an ideology which has been successfully exported to all parts of the world. Thus, there are 28

**Socio-economic characteristics of political regimes (country averages c. 1991–95) Table 10**

Regime	Per capita GDP (US\$)*	Level of urbanization (%)**	Labor force in agriculture (%)**	Adult literacy rate (%)**	Human rights rating (%)**	Government defense spending (% of GDP)*
Lib-dem	9,916	62	21	88	80	1.9
Em-dem	1,557	44	46	66	61	3.5
Communist	708	40	50	87	25	8.4
Nat-soc	1,402	54	42	54	45	5.3
Auth-nat	858	43	41	78	47	3.5
Military	352	26	69	48	25	4.0
Islam-nat	1,085	39	50	39	25	6.3
Absolutist	7,347	59	28	66	44	7.2

\* c. 1995.

\*\* c. 1992.

Lib-dem	Liberal democratic
Em-dem	Emergent democratic
Nat-soc	Nationalistic socialist
Auth-nat	Authoritarian nationalist
Islam-nat	Islamic nationalist
GDP	Gross domestic product

liberal democracies in the Americas and 13 in Oceania. There is, however, a tendency, which is apparent from the national income data provided in Table 11, for this type of political system to flourish best in high-income, 'First World', states. Thus, liberal democracies, are found in 26 of the world's 'Top 30' countries in terms of per-capita incomes, but in only two of the 'Bottom 50'. Similarly, while 18 of the 20 most urbanized states in the world are liberal democracies, none of the top 30 states in terms of the proportion of the labor force employed in agriculture fall into this category. The 74 states with liberal democracies account for a staggering 86% of world GDP and, as Table 10 shows, have high levels of literacy and urbanization and low proportionate levels of government defense expenditure.

In compiling this list of liberal democratic states, the following seven markers have been looked for:

1. Evidence of constitutional government;
2. Evidence of free elections for assemblies and executives;
3. The active presence of more than one political party;
4. Evidence of checks and balances between the three elements of government: executive, legislative, and

judicial;

5. Evidence of an independent judiciary;
6. Evidence of the protection of personal liberties through constitutional or other legal guarantees;
7. Evidence of stability in liberal democratic government.

Our test of stability is necessarily arbitrary. We have included those states where liberal democratic systems have been in place for more than 12 years, that is since before 1987. This 'stability' provides the opportunity for the new democratic system to be tested through at least three electoral cycles.

The states that are included in Table 11 include the seven markers listed above to varying degrees. An indicator of this is the 'Human Rights Rating', compiled by Charles Humana, which is displayed in Table 11. It is a composite measure which embraces various aspects of political and social liberties as of 1991. As a useful rule-of-thumb, a 'Human Rights Rating' of 70% or more is indicative of a political system that displays all seven features noted above. States with ratings below this tend to fail most commonly in markers 3 and 4, being characterized by effective dominance of the political

**Liberal democratic systems (74)****Table 11**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (5)</b>					
India	1947	350	161	54	69
Japan	1946	39,720	4	82	33
Malaysia	1957	3,900	55	61	59
Singapore	1965	23,480	16	60	60
Sri Lanka	1948	710	135	47	82
<b>Central America &amp; Caribbean (17)</b>					
Antigua	1981	6,970	45	N/A	N/A
Bahamas	1973	11,620	36	N/A	N/A
Barbados	1966	6,705	47	N/A	N/A
Belize	1981	2,700	76	N/A	N/A
Costa Rica	1948	2,900	71	90	21
Dominica	1978	3,060	66	N/A	N/A
Dominican Republic	1966	1,470	98	38	N/A
El Salvador	1983	1,610	94	53	72
Grenada	1984	2,970	68	N/A	N/A
Guatemala	1985	1,380	100	62	57
Honduras	1982	620	142	65	53
Jamaica	1962	1,525	95	72	43
Mexico	1917	3,275	62	64	56
St Kitts and Nevis	1983	5,170	50	N/A	N/A
St Lucia	1979	3,775	58	N/A	N/A
St Vincent	1979	2,280	80	N/A	N/A
Trinidad and Tobago	1962	3,860	56	84	29
<b>Central, Eastern, &amp; Southern Europe (3)</b>					
Cyprus	1960	11,720	35	N/A	N/A
Greece	1974	9,640	39	87	26
Turkey	1982	2,770	74	44	85
<b>Central &amp; Southern Africa (2)</b>					
Botswana	1966	3,035	67	79	37
Mauritius	1968	3,340	61	N/A	N/A
<b>Middle East &amp; North Africa (2)</b>					
Egypt	1971	770	131	50	75
Israel	1958	16,320	27	76	39
<b>North America (2)</b>					
Canada	1867	19,600	20	94	15
United States	1776	26,800	9	90	21
<b>Northern &amp; Western Europe (21)</b>					
Austria	1945	26,900	8	95	14
Belgium	1945	24,900	12	96	12
Denmark	1945	29,700	6	98	4
Finland	1917	20,650	18	99	1
France	1946	25,100	10	94	15
Germany	1949	27,600	7	98	4
Iceland	1944	24,500	13	N/A	N/A

*continues*



**Liberal democratic systems (74) (continued)****Table 11**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
Ireland	1937	14,600	29	94	15
Italy	1946	19,030	21	90	21
Liechtenstein	1921	46,200	1	N/A	N/A
Luxembourg	1944	40,870	3	N/A	N/A
Malta	1974	7,900	43	N/A	N/A
Monaco	1911	22,000	17	99	1
Netherlands	1945	23,940	14	98	4
Norway	1945	31,140	5	97	9
Portugal	1976	9,840	37	92	19
San Marino	1600	18,670	24	N/A	N/A
Spain	1978	13,480	32	87	26
Sweden	1809	23,900	15	98	4
Switzerland	1874	40,900	2	96	12
United Kingdom	1689	19,650	19	93	18
<b>Oceania (13)</b>					
Australia	1901	18,720	23	91	20
Kiribati	1979	920	121	N/A	N/A
Marshall Islands	1979	1,630	92	N/A	N/A
Micronesia	1979	2,067	86	N/A	N/A
Nauru	1968	16,000	28	N/A	N/A
New Zealand	1853	14,340	30	98	4
Palau	1981	1,765	89	N/A	N/A
Papua New Guinea	1975	1,220	106	70	47
Philippines	1986	1,050	116	72	43
Samoa (Western)	1962	1,120	113	N/A	N/A
Solomon Islands	1978	920	121	N/A	N/A
Tuvalu	1978	780	129	N/A	N/A
Vanuatu	1980	1,210	108	N/A	N/A
<b>South America (9)</b>					
Argentina	1983	8,150	42	84	28
Bolivia	1982	815	128	71	45
Brazil	1985	3,770	59	69	49
Colombia	1957	2,035	87	60	60
Ecuador	1979	1,425	99	83	30
Guyana	1966	600	143	N/A	N/A
Peru	1980	2,380	79	54	69
Uruguay	1985	5,200	49	90	21
Venezuela	1961	3,090	65	75	40

\* c. 1995.

\*\* c. 1991.

system by one ruling party, although opposition parties are officially allowed to function.

Two such classic examples are Mexico and Singapore, which, respectively, had 'Human Rights Ratings' of just 64% and 60% in 1991. In both these states, effective opposition movements are particularly weak, being hampered by alleged pro-government bal-

lot-rigging in the first and by increasing direct harassment in the second. Despite this, however, in comparative terms, the degree of liberal freedom which is tolerated in these two countries remains tolerably high. Moreover, the longevity and stability of the PRI and PAP party regimes in place make alternative classification in the emergent democracy category inappropriate.

ate. A more accurate descriptive term for these two countries would, however, be 'restricted' or 'partial' liberal democracies. In Malaysia, where the UMNO has been in power since independence and also controls the legislatures of all but one of the federation's 13 states, the term liberal democracy is also somewhat 'restricted'. Similarly dominance by one party is a prominent feature of the political system of Egypt.

Table 12 sets out the average ages of liberal democratic regimes by regions of the world. This has been computed by calculating, for each state, how many years its liberal democratic regime had been functioning without interruption up to 1999 and then producing regional means. It shows North America, with two well entrenched liberal democratic political systems in Canada and the United States, to have the highest overall regional average, at 177 years, followed by Northern and Western Europe, at 91 years. Within Northern and Western Europe there are states such as San Marino and the United Kingdom with liberal democratic regimes which are even older than those of North America. However, the period of Nazi German occupation of France, the Benelux countries, and parts of Scandinavia, has meant that in many states in this region there has been uninterrupted liberal democracy for only half a century.

The world regions with the youngest liberal democracies are revealed to be Central, Eastern, and Southern Europe, South America, Central America and the Caribbean, and Africa. Many of the liberal democracies in these regions remain very much 'on trial'. In Central and South America, such has been the periodicity of lurches between liberty and military coercion in Argentina, Bolivia, Brazil, Ecuador, El Salvador, Guatemala, Honduras, Peru, and Uruguay that the term 'Latin Americanization' has been coined by political scientists. Indeed, as recently as May 1993 an attempt was made by President Jorge Serrano in Guatemala to revert to type and establish dictatorial rule. However, on this occasion, military support was not forthcoming and Serrano was deposed. In Peru, President Fujimori has ruled in alliance with the military since 1992.

The average ages, in 1999, of other regime types were: absolutist, 97 years; communist, 44 years; nationalistic socialist, 23 years; authoritarian nationalist, 11 years; Islamic nationalist, 13 years; military authoritarian, 7 years; and emergent democratic, 8 years.

**Average age of liberal democratic regimes (in 1999)**

**Table 12**

Region	Average age (years)
North America	178
Central & Southern Africa	32
Northern & Western Europe	92
Central America & the Caribbean	28
Asia	46
South America	24
Oceania	38
Central, Eastern, & Southern Europe	27
Middle East & North Africa	35
World average	56

### 3.3 Emergent democracy

The states identified as emergent democracies bear many of the characteristics of liberal democracies except evidence of stability in their political systems, the majority having experienced at least one nondemocratic coup or change of government at some time or other during the past decade. Some have enjoyed stable liberal democratic government for extensive periods only to revert to militaristic or other autocratic rule. Others, for example Indonesia and Nigeria, have emerged from a prolonged spell of autocracy in relatively recent years and it is still too early to judge how permanent the new regime will be. The criterion for inclusion as an emergent democracy is having a democratic system in place since 1987.

One of the most firmly established emergent democracies is that of South Korea, which is now over a decade old and exhibits improving human rights ratings. Also qualitatively high are the liberal democracies of the Central European states of the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, and Slovenia, drawing upon democratic traditions that had been frozen during half a century of communist control. Several of these states are candidates for entry into the European Union within the foreseeable future.

By contrast, the roots of democratic and civil freedoms have barely been planted in more recently emergent regimes, notably those in parts of Central and Eastern Europe and sub-Saharan Africa. In Central, Eastern, and Southern Europe, there are several states, notably Albania, Georgia, Macedonia, and Yugoslavia,

**Emergent democratic systems (71)****Table 13**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (10)</b>					
Bangladesh	1990	240	175	59	63
Cambodia	1998	260	168	33	90
Indonesia	1999	990	119	34	89
Korea, South	1988	9,755	38	59	63
Kyrgyzstan	1991	690	137	N/A	N/A
Mongolia	1990	325	164	N/A	N/A
Nepal	1991	205	180	69	49
Pakistan	1988	475	148	42	86
Taiwan	1991	12,600	34	N/A	N/A
Thailand	1992	2,630	77	62	57
<b>Central America &amp; Caribbean (3)</b>					
Haiti	1994	250	172	N/A	N/A
Nicaragua	1990	380	155	75	40
Panama	1989	2,750	75	81	35
<b>Central, Eastern, &amp; Southern Europe (19)</b>					
Albania	1991	730	133	N/A	N/A
Bosnia-Herzegovina	1990	1,160	110	N/A	N/A
Bulgaria	1990	1,225	105	83	30
Croatia	1990	3,820	57	N/A	N/A
Czech Republic	1989	4,500	52	97	9
Estonia	1990	2,900	71	N/A	N/A
Georgia	1992	835	126	N/A	N/A
Hungary	1989	4,010	54	97	9
Latvia	1990	2,260	82	N/A	N/A
Lithuania	1990	2,265	81	N/A	N/A
Macedonia	1990	845	125	N/A	N/A
Moldova	1990	910	123	N/A	N/A
Poland	1989	2,790	73	83	30
Romania	1989	1,475	97	82	33
Russia	1990	2,240	83	54	69
Slovakia	1990	2,965	69	N/A	N/A
Slovenia	1990	8,410	40	N/A	N/A
Ukraine	1990	1,190	109	N/A	N/A
Yugoslavia	1990	1,520	96	55	68
<b>Central &amp; Southern Africa (30)</b>					
Angola	1994	415	150	27	97
Benin	1991	380	155	90	21
Burkina Faso	1991	245	173	N/A	N/A
Cameroon	1991	670	139	56	66
Cape Verde	1991	875	124	N/A	N/A
Central African Republic	1995	350	161	N/A	N/A
Chad	1993	185	181	N/A	N/A
Côte d'Ivoire	1990	675	138	75	40
Ethiopia	1993	105	191	13	106
Gabon	1990	2,930	70	N/A	N/A
Gambia	1997	330	163	N/A	N/A
Ghana	1992	385	154	53	72

*continues*

**Emergent democratic systems (71) (continued)****Table 13**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
Guinea	1993	555	146	N/A	N/A
Kenya	1997	260	168	46	83
Lesotho	1993	765	132	N/A	N/A
Liberia	1997	670	139	N/A	N/A
Madagascar	1992	225	177	N/A	N/A
Malawi	1994	175	183	33	90
Mali	1992	230	176	N/A	N/A
Mauritania	1991	475	148	N/A	N/A
Mozambique	1994	85	192	53	72
Namibia	1990	2,070	85	N/A	N/A
Nigeria	1999	265	167	49	77
São Tomé	1990	360	159	N/A	N/A
Seychelles	1991	6,625	48	N/A	N/A
Sierra Leone	1998	175	183	67	51
South Africa	1993	3,240	63	50	75
Tanzania	1995	165	186	41	87
Togo	1993	325	164	48	80
Zambia	1991	395	153	57	65
<b>Middle East &amp; North Africa (4)</b>					
Algeria	1995	1,630	92	66	52
Lebanon	1990	3,660	60	N/A	N/A
Morocco	1992	1,100	114	56	66
Yemen	1994	260	168	49	77
<b>Northern &amp; Western Europe (1)</b>					
Andorra	1993	18,750	22	99	1
<b>Oceania (1)</b>					
Fiji	1990	2,440	78	N/A	N/A
<b>South America (3)</b>					
Chile	1990	430	53	80	36
Paraguay	1993	1,735	90	70	47
Suriname	1991	3,110	64	N/A	N/A

\* c. 1995.

\*\* c. 1991.

which currently stand midway between the emergent democratic and authoritarian nationalist categories, while Bosnia-Herzegovina has been in an anarchic condition, crippled by ethnic divisions. In Africa, which was dominated when the first edition of this title was published by one-party nationalistic socialist and authoritarian nationalist regimes, there has been a wave of apparent democratization from the early 1990s. Encouraged by changes in Central and Eastern Europe and by the prompting by Western donors of economic

aid, the formation of opposition parties has been tolerated in the states shown in Table 13 and multiparty elections have been held. However, in some of the states, for example Cameroon, Gabon, and Mauritania, there have still been charges of election-rigging and intimidation of opposition candidates in what could be viewed as 'façade elections'. Changes of government have occurred in Benin, Cape Verde, Mali, São Tomé, South Africa, and Zambia. However, in some countries there is still a close identification of the ruling party

with the state, and the real test of multiparty democracy will come when this ruling party is defeated at the polls and expected to relinquish power.

Several African, Asian, Middle Eastern, and South European states, notably Algeria, Angola, Cambodia, Georgia, Lebanon, Mozambique, and Yemen, still face the problem of continuing insurgencies by rebel groups and ethnic fragmentation is acute in some countries. For this reason, the armed forces, in these and several Asian and American states, remain influential background watchdog arbiters who might be tempted to reassert direct control in the near future if the democratization process moves ahead in a direction which sharply conflicts with their own interests. Indeed, there have been recent attempted coups in Cambodia, Cape Verde, Chad, Paraguay, and São Tomé, while in Lebanon the Syrian army is the dominant force. At present many states in Central and Southern Africa are situated, most accurately, at various positions on a continuum between the emergent democratic and the nationalistic socialist and authoritarian nationalist ideological categories. However, the existence of multiparty politics, despite its fragile, nascent form, has resulted in the tentative inclusion of these states in this ideological category.

Despite these clear variations in degrees of 'democratization', all the states categorized as emergent democracies might usefully be described as liberal democracies on trial, and the 71 so identified are listed in Table 13. The dates of origin of the current regimes are also shown. The states included embrace nearly 1.5 billion people, or 26% of the world's population. Thirty-one are middle-high income states, situated predominantly in Central and Eastern Europe and Southeast Asia. However, the overall share of emergent democracies in world GDP is only 8% and, as Table 10 shows, the average per-capita income in emergent democracies was only \$1,557 in 1995.

### 3.4 Communism

As an ideology communism stems from the writings of Marx and Engels, which were subsequently taken up by Vladimir Ilyich Lenin and his associates, and adapted to meet the needs of early 20th-century Russia. According to Marx, communism is an ideal which is eventually reached when all private property and class distinctions have been abolished and the state has become redundant and 'withered away'. In these terms, the nations

which are commonly referred to as communist can hardly be said to be 'without states'. Indeed, they possess some of the most elaborate structures of state institutions in the world.

Nor were the origins of the Soviet Union, which used to be the 'model' for all communist systems, congruent with the classic texts of Marx and Engels. According to these, anticapitalist revolutions should have first taken place in Western Europe, the most developed region of the world, where the industrial proletariat (working class) were expected to rise up in revolt against mounting exploitation by the bourgeoisie (industrial/business middle class). This would then have led on to an intermediate 'socialist' phase in which the state remained in place, serving as the instrument of the working classes in a 'revolutionary dictatorship', and in which inequalities continued to be tolerated, with each producer being paid according to work done. Later, as affluence increased, a final, 'higher' phase of full communism would be achieved, no longer requiring the apparatus of government for its sustenance, in which all labor divisions would be ended and each worker would be able to receive 'according to his needs'.

In reality, however, revolution occurred first in underdeveloped Russia, in October 1917. This revolution was, moreover, far from a spontaneous uprising of industrial workers. Instead, it was a wartime 'coup', stimulated and led by Lenin, a member of the white-collar intelligentsia, with most of its 'revolutionary troops' drawn from peasant stock. Theoretical justification for this was provided by Lenin's theory of 'Imperialism: The Highest Stage of Capitalism'. This envisaged the 'vanguard' position of disciplined communist parties who would foment revolution with the aim to destroy the links which bound together the global capitalist system and thus precipitate a final revolutionary cataclysm in the advanced West. This subsequent revolution failed to take place, however, leaving the Soviet Union to protect and 'build socialism' alone during the interwar period. Only after the end of World War II did significant new communist regimes become established. As in the Soviet case, however, they were to be found in the backward 'Second and Third Worlds' of Eastern Europe and Asia, having been imposed either by military force, where, as a consequence, they suffered from a lack of popular legitimacy, or following guerrilla-based, anticolonial liberation struggles.

Today, the followers of Marx and Lenin reluctantly agree that the ideal of communism has not been reached and that the intermediate condition of socialism

Communist systems (5)

Table 14

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (4)</b>					
China	1949	730	133	21	101
Korea, North	1948	835	126	20	N/A
Laos	1975	370	158	N/A	N/A
Vietnam	1945***/1976****	245	173	20	97
<b>Central America &amp; Caribbean (1)</b>					
Cuba	1959	1,230	104	30	93

\* c. 1995.

\*\* c. 1991.

\*\*\* North.

\*\*\*\* South.

remained a truer description of the Soviet system and those of its imitators. In no country did the state 'with away'. Instead, the communist party remained firmly in charge, dominating state institutions, having assumed its prescribed role as the 'vanguard of the proletariat', so as to protect socialist society before the advent of true communism. The accession of Mikhail Gorbachev to the leadership of the Communist Party in the Soviet Union in 1985 resulted in the effective abandonment of striving for achievement of the theoretical ideal of communism. Instead, through his *'perestroika'* (economic restructuring), *'glasnost'* (openness), and *'demokratiya'* (democratization) initiatives, an attempt was made to build an economically successful and democratically accountable 'socialist democracy', very much on the lines of Western social democracy. This attempt failed, with the unbottled ethnic and nationalist tensions within the Soviet Union and its satellites, and the tremendous economic hardship caused by the transition from a planned to a capitalist economy, resulting in the collapse of the Soviet bloc between 1989 and 1991.

In Asia, legitimate, purportedly communist regimes have survived in China, North Korea, and Indo-China and, in the Caribbean, Castro's Cuba also remains a defiant outpost. However, these states, which have been distinguished by the charismatic leadership of their 'liberation leaders' and a powerful role for the armed forces, have all followed 'paths to socialism' which have diverged significantly from the Soviet model. In China, in particular, since 1978, under the leadership of first Deng Xiaoping and then Jiang Zemin, there has been

emphasis on market-centered economic reform, while tight political controls have been maintained in almost an authoritarian nationalist manner. During recent years the market has also been embraced in Laos, Vietnam, and Cuba.

The five states which still can be described as 'communist', since one-party control is maintained by a party which subscribes to the ideology of communism, in Marxist terms, are set out in Table 14. They account for a disproportionate share of the world's population, 24%, but only a fraction, 3.4%, of its GDP. Human rights ratings in all five states are abysmally low, but levels of government defense expenditure are exceptionally high, ranging from 2.8% in Cuba to a crippling 25.2% in North Korea. Literacy rates are high.

Four distinguishing features characterize such communist states:

1. Marxism-Leninism (in the case of China, Maoism-Dengism) has been adopted as the official ideology, source of legitimacy, and vocabulary of political affairs;
2. The bulk of economic activity is under state ownership and subject to administrative (central) planning;
3. One party, the Communist Party, dominates the political scene and is tightly controlled from above in accordance with the Leninist precept of 'democratic centralism';
4. The influence of the Communist Party, constitutionally ascribed a 'leading role' in the nation's

affairs, is all-pervasive, controlling state organs, trade unions, the media, the judiciary, and industrial and agricultural enterprises through both supervision and direct membership.

Communist parties, able to attract a significant share of the national vote and even win shares in power, operate with success in several emergent democratic states in Central and Eastern Europe. However, they accept the tenets of multiparty liberal democracy. This is not the case with restyled former communist parties and their leaders who continue to control the states of Azerbaijan, Kazakhstan, Tajikistan, Turkmenistan, and Uzbekistan in the former Soviet-controlled regions of the Caucasus and Central Asia. Communism has been officially abandoned in these states, so they have been categorized in this volume as authoritarian nationalist states. However, a 'return to type' may occur in future years in several of them.

### 3.5 Nationalistic socialism

Countries which have been placed in this category display many of the attributes of a communist state but in a less developed and structured form. A key feature is the existence of one political party of avowed socialist orientation, but whose role, in practice, has been more that of a promoter of nationalism and an opponent of

imperialism than of a 'guardian of the proletariat' and radical transformer of the country's economic structure. Private farming and petty manufacturing have, for example, remained predominant in these states.

In many countries subscribing to nationalistic socialism the presence of a 'charismatic leader' has been a distinctive characteristic. Muammar al-Kadhafi of Libya, Robert Mugabe of Zimbabwe, Issaias Afwerki of Eritrea, Saddam Hussein of Iraq, and Hafez al-Assad of Syria are obvious examples, the former two having established their reputations as a guerrilla or political leader during their nations' independence struggles. In addition, a significant number of the states included in Table 15, Eritrea, Iraq, Libya, and Syria being the most prominent examples, have been involved, in recent years, in militarized border disputes with their neighbors. This has served to enhance the nationalist standing and inclination of their leaderships and has also resulted in the states being burdened by high levels of defense spending, equivalent to as much as 15% of GDP in Iraq.

The eight states identified as having nationalistic socialist regimes and set out in Table 15 embrace 73 million people, or just over 1% of the world's total population. They are concentrated in the Middle East and Africa. Indeed, it has been seriously argued that in Africa, with many societies divided vertically along tribal, regional, ethnic, and religious lines, rather than

**Nationalistic socialist systems (8)**

**Table 15**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Central &amp; Southern Africa (4)</b>					
Congo, Republic of	1997	710	135	N/A	N/A
Eritrea	1993	170	185	N/A	N/A
Senegal	1960	630	141	71	45
Zimbabwe	1980	565	145	65	53
<b>Middle East &amp; North Africa (4)</b>					
Iraq	1970	1,150	111	17	104
Libya	1977	6,715	46	24	99
Syria	1971	1,140	112	30	93
Tunisia	1963	1,870	88	60	60

\* c. 1995.

\*\* c. 1991.

horizontally by social class, multiparty democracy can be a recipe for chaos and that one-party regimes are able to bring greater stability.

In terms of civil rights restrictions, the overall ratings recorded by most nationalistic socialist regimes are disappointingly low. Three regimes, however, those of Senegal, Tunisia, and Zimbabwe, despite the monism of their political structures, stand out as significantly more 'liberal', exceeding the rating registered by several emergent democratic nations. In all three states multiparty political systems have been recently restored. However, such is the long-standing *de facto* dominance exerted by the ruling party in each state, that it has been sensible to include these regimes in the nationalistic socialist category in preference to that of emergent democracy.

### 3.6 Authoritarian nationalism

In its starkest form nationalism is a belief that people of the same racial stock are so unique that only they have

the right to be regarded as members of a nation. This extreme kind of nationalism is so intolerant of other races and creeds that, at best, they are disenfranchised and, at worst, eliminated. Nazi Germany exhibited this attitude in its most brutal form and until quite recently the formerly white-dominated regime in South Africa pursued its own version of the 'final solution' through the operation of the system of apartheid.

Fortunately, although atrocities of 'ethnic cleansing' have been committed during the 1990s in Bosnia-Herzegovina, Serbia and Rwanda, extreme examples of this kind are rare. Most present-day exponents of nationalism use it as a device to claim the loyalty and obedience of members of the public. Even liberal democratic states are guilty of nationalistic tendencies, though they may disguise the fact under the banner of patriotism. The national flag and the national anthem are manifestations of nationalism under the guise of patriotism and even sport has succumbed to its temptations.

A state which subscribes to the ideology of authoritarian nationalism displays the following three features:

**Authoritarian nationalist systems (12)**

**Table 16**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (5)</b>					
Kazakhstan	1991	1,300	102	N/A	N/A
Maldives	1968	980	120	N/A	N/A
Tajikistan	1991	360	159	N/A	N/A
Turkmenistan	1991	1,080	115	N/A	N/A
Uzbekistan	1991	1,040	117	N/A	N/A
<b>Central, Eastern, &amp; Southern Europe (3)</b>					
Armenia	1990	775	130	N/A	N/A
Azerbaijan	1993	480	147	N/A	N/A
Belarus	1994	2,080	84	N/A	N/A
<b>Central &amp; Southern Africa (4)</b>					
Djibouti	1981	995	118	N/A	N/A
Equatorial Guinea	1991	400	152	N/A	N/A
Rwanda	1994	150	188	48	80
Uganda	1986	225	177	46	83

\* c. 1995.

\*\* c. 1991.



1. Restrictions on the activities of all political parties, or a limitation to one which gives undivided and uncritical support to the state;
2. An authoritarian charismatic personal or collective executive;
3. Either the absence of an assembly to balance the power of the executive, or the presence of an assembly which is essentially the servant of the executive.

For many states adherence to authoritarian nationalism will be a stage in the progression of independence from the rule of a colonial power to emergent democracy and, eventually, to a full, pluralistic democracy. Given a much longer time span, it is conceivable that all states will eventually abandon nationalistic tendencies and move towards regional, and even global, groupings. These developments are examined in Section III.

The 12 countries identified as proponents of authoritarian nationalism are listed in Table 16. Within this grouping it must be stressed, however, that there exist considerable differences between both the policy outlooks and the degree of illiberalism of the regimes in power. For example, those in former Soviet-controlled Central Asia and the Caucasus region are, as noted, successors to powerful state-dominated communist regimes, while that in Indonesia is a military-backed regime which has successfully pursued a program of capitalistic economic modernization. Those in Africa are found in states where tribal-based ethnic divisions are especially acute, leading to a recent civil war in Rwanda.

Despite these clear variations, two elements remain common to all 12 states:

1. The existence of *de facto* one-party dominance;
2. Policy orientations which fall short of being fully socialist.

The second characteristic serves to distinguish these states from those included in the nationalistic socialist category above, thus making their inclusion in this group defensible.

The 12 states identified embrace 99 million people, or nearly 2% of the global population. There is an even division between locations in Central and Southern Africa and Asia. The longest standing authoritarian nationalist regime has been established for more than two decades in the Maldives, with the recent signing of a peace accord in Tajikistan with the Islamic opposition, there were signs that this state might follow the example of Indonesia, in 1999, and become an emergent democracy.

### 3.7 Military authoritarianism

Military authoritarianism is a form of authoritarian nationalism whereby military leaders take it upon themselves to impose a government on the people, claiming, invariably, that it is for the public good. History is littered with examples of regimes when 'men of action' have felt it necessary to use their military strength to overthrow and replace civilian administrations. In some cases the transition is short-lived, in others military rule has become a quasi-permanent feature.

The characteristics of a state accepting authoritarian nationalism will be found also in this category with, of course, a military regime always in control. Sometimes a state based on military authoritarianism will try to disguise itself by using a civilian administration as a façade, fronting the military power behind. Panama, during the 1980s, provided an example of this. The military remain influential in a number of emergent democratic, nationalistic socialist and authoritarian nationalist states, notably Algeria, Angola, Bosnia, Chile, Ghana, Guinea, Indonesia, Iraq, Mozambique, Pakistan, Paraguay, Rwanda, São Tomé, and Thailand, as well as in 'liberal democratic' Peru.

In Ghana the charismatic Flight-Lieutenant Jerry Rawlings, who twice seized power as a populist military leader in 1978 and 1981, succeeded in effecting the transition from military ruler to popularly elected president in a multiparty, emergent democratic state in 1992. In Indonesia, T N J Suharto, who assumed power in a coup in 1965, remained president from 1967 to 1998, being re-elected at regular five-yearly intervals. The 'presidential path' was also pursued, with varying success, by General Alfredo Stroessner in Paraguay (1954–89), General Zia ul-Haq in Pakistan (1977–88), and Lieutenant-General Hossain Mohammad Ershad in Bangladesh (1982–90). In most other cases military leaders, aware of their lack of legitimacy, have sought to 'return to barracks' and hand over power to civilian leaders once the circumstances that precipitated a coup have been resolved. However, after a country's armed forces have entered the political arena once, they appear to be less inhibited from re-entering again to 'correct' the political process. This has certainly been the experience of Pakistan, Thailand, and the states included in Table 17.

The eight states subscribing to military authoritarianism and listed in Table 17 embrace 142 million people, or 3% of the global total. Four-fifths are located in

Military authoritarian systems (8)

Table 17

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (1)</b>					
Myanmar	1988	580	144	17	104
<b>Central &amp; Southern Africa (7)</b>					
Burundi	1996	160	187	N/A	N/A
Comoros	1999	380	155	N/A	N/A
Congo, Democratic Republic of	1997	125	190	40	88
Guinea-Bissau	1999	255	171	N/A	N/A
Niger	1999	225	177	N/A	N/A
Somalia	1969	310	166	N/A	N/A
Sudan	1989	415	150	18	103

\* c. 1995.

\*\* c. 1991.

Central and Southern Africa and the states are located in the world's bottom quartile in terms of per-capita GDP. Literacy rates and urbanization levels are also low, as Table 10 reveals, with a high proportion of the labor force still engaged in agricultural activities. There are no military regimes currently in Europe, Oceania, and the Americas and in recent decades only two military states have been established in Europe and Oceania: in Greece between 1967 and 1973 and in Fiji between 1987 and 1990. Periods of military junta rule have, however, been common in Central and South America during the course of this century.

The average age of the world's seven current military regimes is less than seven years. This reflects the necessarily transient character of this illegitimate regime type. The longest entrenched military-based regime is in Somalia, dating back to 1969, although it has a presidential façade. However, in Myanmar the military first effectively came to power in 1962. In Sudan the military regime adheres to Muslim fundamentalist principles and has waged campaigns against the Christian and animist population in the country's south.

### 3.8 Islamic nationalism

As Table 18 shows, there are two countries with Islamic nationalist political regimes, Afghanistan and Iran. In

these states the political process is completely dominated by fundamentalist Islam, a religious ideology that fulfils a political function similar to that performed by Marxism-Leninism in a communist regime. Sharia (Islamic law) is enforced, Islamic spiritual leaders (ayatollahs and mullahs) provide strategic guidance, and the policies of the (Islamic) political parties are framed in accordance with the Koran and Sharia, with religious scholars occupying prominent positions. In Iran, an Islamic state was established in 1979 after a popular revolution, inspired by the exiled Ayatollah Khomeini, succeeded in overthrowing the Western-backed Muhammad Reza Shah Pahlavi. The background to this revolution was the disenchantment of young people, especially students, with the widening gap between rich and poor that had been created by the Shah's economic modernization drive, and their desire to recreate a Golden Age of Islam through a return to traditional Islamic values. In Afghanistan, Islam was established by force after a 13-year guerrilla war by the mujaheddin ('holy warriors') against a Russian-backed communist regime. Nationalism in both states is thus intimately linked with defense of Islamic faith against 'corrupting' outside religions and ideologies, specifically Western materialism and atheistic communism. There have also been attempts to extend the jihad (Islamic holy war) and export fundamentalist Islam to neighboring states, notably Iraq and Tajikistan.

Islamic nationalist systems (2)

Table 18

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (1)</b>					
Afghanistan	1992	150	188	28	96
<b>Middle East &amp; North Africa (1)</b>					
Iran	1979	1,380	100	22	100

\* c. 1995.

\*\* c. 1991.

The combined population of the two states with Islamic nationalist regimes is 78 million and, as Table 10 shows, human rights ratings and literacy and urbanization levels are comparatively low. Since 1989 and the death of Ayatollah Khomeini, the Islamic revolution in Iran has entered a less militant phase. The country's economy was greatly weakened by a 1980–88 war with neighboring Iraq. This persuaded Hoshemi Rafsanjani, the president from 1989 to 1997, to rule pragmatically. His successor Professor Khatami has accelerated the process of liberalisation. In Afghanistan, after toppling the socialist regime of Najibullah Ahmadzai in 1992, the mujaheddin became riven by regional and ideological-based factional rivalries. As a consequence, the civil war continued, and in 1996 the mujaheddin were themselves overthrown by the Islamic extremist Taliban.

In 23 other countries in the world Islam is similarly the state religion (see Table 8). Although Sharia law is followed by many of these states, the party political processes have not yet been so thoroughly permeated by the ideology of Islam as to merit application of the classification 'Islamic nationalist'. However, in Sudan, under the military's patronage, fundamentalist Islam has grown greatly in influence during recent years and Islamic militants were involved in 1998 in virtual civil wars in Algeria and Kashmir (India.)

### 3.9 Absolutism

Absolutism is an ideology which can be traced back to *The Leviathan*, written by Thomas Hobbes (1588–1679) soon after the mid-17th-century English Civil War (1642–52), in support of the English monarchy as

the guarantor of stability and order. The ideology had even earlier roots in the medieval European doctrine of 'The Divine Right of Kings'. It argues that no limits whatsoever should be placed on the activities of a legitimate government, which will usually be in the form of an absolute monarch. Legitimacy is often claimed through the accident of birth, although it is convenient to forget that at some stage in history that legitimacy must have been acquired by force.

For a nation in an early stage of economic and social development, or one threatened by external forces, absolutism is an attractive ideology to accept, offering a guarantee of stability and order. For some countries it may only represent a stage in their development, to be superseded by a republican form of government or by a constitutional monarchy. For others it has become a permanent condition.

The characteristics of a state based on absolutism are:

1. The absence of any constitutional form of government, or a popular assembly or judiciary to counter executive power;
2. The denial of the right to form political parties or other forms of organized interests;
3. Governing systems based on clientism (support derived from patronage) or neo-patrimonialism (rule based on inheritance).

The 12 states adhering to absolutism, or a 'traditional regime', are listed in Table 19 and comprise an assortment of monarchies (Bhutan, Jordan, Saudi Arabia, Swaziland, and Tonga), sultanates (Brunei and Oman), and sheikhdoms and emirates (Bahrain, Kuwait, Qatar, and the United Arab Emirates), in addition to the papacy of Rome. In Bhutan there has been growing popular

pressure for democratization and the monarchies in Jordan and Tonga, although absolute in the final analysis, do have vestiges of constitutional checks and balances. One other state, Morocco, is also characterized by monarchical rule, but within a more fully developed and party-based constitutional structure. For this reason it has been assigned, instead, to the emergent democracy category. Nepal was also an absolute state until widespread prodemocracy demonstrations in 1990 resulted in the establishment of a constitutional monarchy on the parliamentary executive model.

The 12 absolutist regimes included in Table 19 embrace a population of 33 million, corresponding to less than 1% of the world total. Seven are located in the Middle East, in which region it constitutes the predominant political type. It should also be noted that seven of these absolutist states, including five in the Middle East, are, as a consequence of their mineral oil wealth, among the world's 'Top 50' nations in terms of per-

capita national income. This has meant that, although Bhutan and Swaziland are low-income states, the average per-capita income for absolutist states was \$7,347 in c. 1995. As Table 10 shows, urbanization rates are also quite high, while levels of government defense spending are very high. Significantly, all the absolute states, except Swaziland, have an established religion.

### 3.10 The changing balance of ideologies

In 1989, when the first edition of this title was written, slightly more than half, 83 out of 164, of the nation-states of the world had regimes which could be classified as either liberal democratic or emergent democratic. Nearly a quarter, or 37 states, had effectively one-party socialist regimes, categorized either as communist or nationalistic socialist. This state type was

**Absolutist systems (12)**

**Table 19**

Region/country	Year established	Per capita GDP (US\$)*	Per capita GDP (world ranking)*	Human rights rating (%)**	Human rights rating (world ranking)**
<b>Asia (2)</b>					
Bhutan	1907	180	18	N/A	N/A
Brunei	1984	13,030	33	N/A	N/A
<b>Central &amp; Southern Africa (1)</b>					
Swaziland	1968	1,270	103	N/A	N/A
<b>Middle East &amp; North Africa (7)</b>					
Bahrain	1971	8,240	41	N/A	N/A
Jordan	1952	1,220	106	65	53
Kuwait	1961	18,360	25	33	90
Oman	1951	5,090	51	49	77
Qatar	1971	13,800	31	N/A	N/A
Saudi Arabia	1932	7,650	44	29	95
United Arab Emirates	1971	17,900	26	N/A	N/A
<b>Northern &amp; Western Europe (1)</b>					
Vatican City State	1377	25,000	11	N/A	N/A
<b>Oceania (1)</b>					
Tonga	1875	1,700	91	N/A	N/A

\* c. 1995.

\*\* c. 1991.

Number of world political regimes by type in 1989, 1995, and 1998

Table 20

Year	Liberal democratic	Emergent democratic	Communist	Nationalistic socialist	Authoritarian nationalist	Military	Islamic nationalist	Absolutist
1989	50	33	16	21	16	16	0	12
1995	73	72	5	8	13	7	2	12
1999	74	71	5	8	12	8	8	12
<i>Change</i>	+24	+38	-11	-13	-4	-8	+2	-

particularly common in Central and Eastern Europe and Africa. The remaining sovereign states in the world had predominantly rightwing authoritarian nationalist, military, and absolutist regimes.

Six years on, when the next edition was produced, as Table 20 demonstrates, the world political map had been radically transformed. With the collapse of the Soviet Union's communist empire and the adoption of multiparty democracy in much of Africa, the number of states with liberal democratic and emergent democratic political systems had increased to 145, equivalent to three-quarters of the world's total. Pluralist democracy predominated in Europe and the Americas, in particular, but had also put down new roots in Asia and Africa. In 1995, only 13 of the world's 192 states had avowedly socialist regimes of a communist or nationalistic socialist type but, while the number of military regimes had also fallen sharply, there were still 25 absolutist and authoritarian nationalist states.

In 1998, the position remained broadly similar to three years earlier. One more state, the Philippines, had moved from emergent democratic to liberal democratic, while the former authoritarian nationalist or military regimes of Gambia, Indonesia, Liberia, Nigeria, and Sierra Leone had become emergent democratic. There had also been some relapses away from emergent democracy, in the cases of Belarus, the Republic of Congo, Djibouti, Equatorial Guinea, Guinea-Bissau, Niger, Comoros, and Tunisia, and into the military category for the Democratic Republic of Congo and Burundi. However, with Algeria, Kenya, and Tanzania making tentative moves into the emergent democratic category, there was overall maintenance of the democratic position between 1995 and 1998.

The onward march of pluralist liberal democracy, allied to a capitalist mixed economy, has been presented by some writers, notably Francis Fukuyama, as an inexorable process. Communism, criticized now as a 'grand

oversimplification', and socialism are viewed as failed experiments, while the increasing competitive pressures of the global economy and popular demands for individual liberties are seen as key elements which will force a convergence in political types.

However, the annual reports of human-rights monitoring bodies such as Amnesty International and Freedom House show that, in the mid-1990s, in more than 60 countries prisoners of conscience were held, political killings sanctioned, and people detained without charge or trial. Clearly many states are far from being pluralist entities and are guided by different ideological impulses. In addition, history shows that waves of democratization have been followed later by periods of reversion. Nationalism, mobilizing citizens on ethnic lines, remains a potent political force despite the continued development of regional political groupings. Populism, as noted earlier, is also emerging as a new ideology, while the limitations of free-market capitalism, which produces 'losers' as well as 'winners', mean that democratic socialism, with its recognition of, and compensation for, natural individual inequalities, will remain a relevant and popular political ideology.

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# Executives

## 4.1 Political executives

It is usual to make a distinction between the political executive and the nonpolitical, or permanent, executive. The latter is the salaried civil service which normally remains in office to work for whichever politicians happen to be in power. They, in turn, constitute the political executive and, as such, provide the leadership for both the political system and the state.

The modern political executive can be personal or collective and is found in a variety of forms including president, prime minister, and party chairman or secretary-general. Whatever the contemporary form and title, each is a direct descendant of the personal autocrat or absolute monarch, at one time universal.

States with more than one operating political party have been identified as liberal democracies or emergent democracies. With only a few exceptions, their executives are either presidents or prime ministers. We shall refer to them, respectively, as presidential or parliamentary executives. In the exceptions, a dual executive, usually of a president and a prime minister, operates.

One-party states have been subdivided into communist, nationalistic socialist, authoritarian nationalist, and military authoritarian. In these cases the most common form of executive is, again, presidential, although in those we have identified as communist the executive assumes a distinctive form, partly collective and partly personal, as, at the apex of power, the state and party machines merge.

Finally, there are the few surviving absolutist states, where political parties have no role to play, and the executives are individuals exercising virtually unbridled power in very much the same way as the original precursors of what we now call democratic governments.

Table 21 shows the current distribution of political executives in the 192 states under consideration.

## 4.2 The parliamentary executive

This is the second most common form of political executive in the world today, 56 states having adopted it,

embracing over a third of the global population. Thirty-one of them are constitutional monarchies and 25 republics. It is sometimes referred to as the 'Westminster model' because it originated, and is found in its clearest form, in the United Kingdom. It is not coincidental that of the 56 nations with parliamentary political executives, 29, including the United Kingdom, were formerly part of the British Empire and are now independent members of the Commonwealth. It is useful, therefore, to examine the UK system, even though the executives of other countries have been adapted from the original example to suit particular needs. All parliamentary executives are found in multiparty liberal (44) or emergent democracies (12), with 18 of the total being in Northern and Western Europe, 11 in the Caribbean region and eight in Oceania. Almost half, 46%, are located in island states. This executive type is found mainly in smaller states, although India, the world's second most populous nation, has a parliamentary executive (Table 21). Thus two-thirds of the states with parliamentary executives have populations below 10 million and areas less than 100,000 square kilometres. The full list, showing geographical distributions, is given in Table 22.

The parliamentary executive displays three essential features:

1. The role of head of state is separate from that of head of government and is distant from party politics, serving mainly as the patriotic and ceremonial focus of the nation. The head of state can be a president, as in Germany or India, or a monarch, as in the Netherlands or the United Kingdom. In the majority of Commonwealth countries with parliamentary executives, the head of state is still the British monarch, represented by a resident governor general.
2. The executive is drawn from the assembly and directly responsible to it, and its security of tenure is dependent on the support of the assembly, or parliament. In other words, a 'no-confidence' vote in parliament can bring down the government, resulting in a change of executive or a general elec-

tion. It is in such circumstances that the nonpolitical head of state may become temporarily involved in politics by either inviting the leader of a party in opposition to form a new government, or by dissolving parliament and initiating elections.

A particular characteristic of the 'Westminster model' is that it is, historically, based on the concept of a two-party system. The House of Commons, for example, is physically constructed to accommodate two opposing parties, the govern-

## World distribution of executive systems

Table 21

### By region

Region	Parliamentary	Limited presidential	Dual	Communist	Unlimited presidential	Military	Absolute	Total
Asia	8	5	2	4	6	1	2	28
Central America & Caribbean	11	8	1	1	0	0	0	21
Central, Eastern, & Southern Europe	6	8	8	0	3	0	0	25
Central & Southern Africa	3	28	1	0	8	7	1	48
Middle East & North Africa	1	3	2	0	5	0	7	18
North America	1	1	0	0	0	0	0	2
Northern & Western Europe	18	1	3	0	0	0	1	23
Oceania	8	6	0	0	0	0	1	15
South America	0	12	0	0	0	0	0	12
<i>Total</i>	<i>56</i>	<i>72</i>	<i>17</i>	<i>5</i>	<i>22</i>	<i>8</i>	<i>12</i>	<i>192</i>

### By population and land area (c. 1995)

Executive type	Number of states	Area (thousand sq km)	Area (% of world)	Population (millions)	Population (% of world)
Parliamentary	56	29,034	21.8	1,914	34.0
Limited presidential	72	69,315	52.1	1,743	31.0
Dual	17	3,813	2.9	228	4.0
Communist	5	10,349	7.8	1,327	23.5
Unlimited presidential	22	12,253	7.8	249	4.4
Military	8	7,497	5.6	142	2.5
Absolute	12	2,644	2.0	33	0.6
Sub-total	192	133,021	100.0	5,636	100.0
Colonies & dependent territories*	41	2,387	—	10	—
<i>Total</i>	<i>233</i>	<i>135,408</i>	<i>—</i>	<i>5,646</i>	<i>—</i>

### By state population (c. 1995)

State population size (million)	Parliamentary	Limited presidential	Dual	Communist	Unlimited presidential	Military	Absolute	Total
< 0.1	9	5	0	0	0	0	2	16
0.1 to < 1	12	6	0	0	3	1	4	26
1 to < 10	16	30	10	1	10	4	5	76
10 to < 20	5	12	3	1	6	0	1	28
20 to < 50	4	10	3	1	2	3	0	23
50 to < 100	6	4	1	1	1	0	0	13
100 to < 200	3	4	0	0	0	0	0	7
200 to < 500	0	1	0	0	0	0	0	1
500 to 1,250	1	0	0	1	0	0	0	2
<i>Total</i>	<i>56</i>	<i>72</i>	<i>17</i>	<i>5</i>	<i>22</i>	<i>8</i>	<i>12</i>	<i>192</i>

*continues*



World distribution of executive systems (continued)

Table 21

## By state area

State area (thousand sq km)	Parliamentary	Limited presidential	Dual	Communist	Unlimited presidential	Military	Absolute	Total
< 1	14	7	0	0	1	0	3	25
1 to < 10	4	2	0	0	0	1	1	8
10 to < 100	16	14	10	0	5	2	6	53
100 to < 500	14	20	5	4	12	0	1	56
500 to < 1,000	4	14	1	0	1	2	0	22
1,000 to < 5,000	2	12	1	0	3	3	1	22
5,000 to < 10,000	2	2	0	1	0	0	0	5
10,000 to 20,000	0	1	0	0	0	0	0	1
<i>Total</i>	<i>56</i>	<i>72</i>	<i>17</i>	<i>5</i>	<i>22</i>	<i>8</i>	<i>12</i>	<i>192</i>

\* Excludes Corsica, Western Sahara, and Tibet, whose area and population are included in the totals for France, Morocco, and China, within the dual and communist executive categories.

ment party sitting on benches to the right of the chairperson of the House, or speaker, and the opposition party to the left. Also, the leader of the opposition is acknowledged formally in legislation, provided with a suitable office, and paid a salary out of public funds. This practice is followed in several Commonwealth states, most notably Australia and New Zealand, but is not an essential feature of a parliamentary executive. Indeed, the majority of European states, including Germany, Austria, Belgium, Denmark, Ireland, Italy, the Netherlands, and Norway, have a wide range of parties, and governments are frequently, and in some cases invariably, formed by coalitions of these parties. The term, 'consensus democracy', or consociationalism, has been coined to describe this political model. Conversely, in a number of Asian states with parliamentary executive systems, for example, Malaysia, Singapore and, until recently, India and Japan, effective one-party electoral dominance has been the norm, although opposition parties do operate.

3. The leader of the party, or coalition of parties, commanding the support of parliament is called upon by the head of state, monarch or president, to become prime minister and form a government. The prime minister then chooses a cabinet, drawn from parliament, and they, with other noncabinet ministers, form the government. In Israel, since 1996, the prime minister has been directly elected by popular vote, creating elements of the presidential model.

The fact that the parliamentary executive is drawn from and responsible to the assembly makes it, in theory at least, particularly accountable. In reality much depends upon the state of the parties in parliament. A British prime minister, for example, enjoying a clear parliamentary majority, usually has greater executive power and discretion than a US president, subject to the checks and balances of a constitution which gives significant power and authority to an independent congress. In countries where coalition governments are the norm prime ministerial authority is invariably weaker, with power diffused among ministers drawn from a variety of parties. Special arrangements have been devised in a number of such cases, however, to buttress the chief executive's authority. The most notable example is Germany in which, under the terms of the Basic Law (constitution) of 1949, members of the assembly can only force the replacement of the chancellor (prime minister) through a 'constructive vote of no confidence', by which a majority of members vote positively in favor of a proposed successor.

Four of the newly democratized states of former Soviet-controlled Central and Eastern Europe, Bulgaria, Hungary, Latvia, and Slovakia, now have vigorously functioning parliamentary executives. A further eight, Albania, the Czech Republic, Estonia, Lithuania, Macedonia, Poland, Romania, and Slovenia, have executives which have been categorized as 'dual', but are substantially parliamentary in nature. The remaining 15 states in this region and in ex-Soviet Central Asia have presidential executives, both limited (8) and unlimited (7).

## States with parliamentary executives (56)

Table 22

Region/country	Republic (R) or monarchy (M)	Member of Commonwealth	Year established	Year current head of state came to power	Year current prime minister came to power
<b>Asia (8)</b>					
Bangladesh	R	Y	1991	1996	1996
India	R	Y	1947	1997	1998
Japan	M	N	1946	1989	1998
Malaysia	M	Y	1957	1999	1981
Nepal	M	N	1991	1972	1998
Pakistan	R	Y	1988	1997	1997
Singapore	R	Y	1965	1993	1990
Thailand	M	N	1992	1946	1997
<b>Central America &amp; Caribbean (11)</b>					
Antigua	M	Y	1981	1981	1993
Bahamas	M	Y	1973	1973	1992
Barbados	M	Y	1966	1966	1994
Belize	M	Y	1981	1981	1998
Dominica	R	Y	1978	1998	1995
Grenada	M	Y	1974	1974	1995
Jamaica	M	Y	1962	1962	1992
St Kitts and Nevis	M	Y	1983	1983	1995
St Lucia	M	Y	1979	1979	1997
St Vincent and the Grenadines	M	Y	1979	1979	1984
Trinidad and Tobago	R	Y	1962	1987	1995
<b>Central, Eastern, &amp; Southern Europe (6)</b>					
Bulgaria	R	N	1990	1997	1997
Greece	R	N	1974	1995	1996
Hungary	R	N	1989	1990	1998
Latvia	R	N	1990	1999	1999
Slovakia	R	N	1990	1999	1998
Turkey	R	N	1982	1993	1999
<b>Central &amp; Southern Africa (3)</b>					
Ethiopia	R	N	1994	1995	1995
Lesotho	M	Y	1993	1996	1998
Mauritius	R	Y	1968	1992	1995
<b>Middle East &amp; North Africa (1)</b>					
Israel	R	N	1948	1993	1999
<b>North America (1)</b>					
Canada	M	Y	1867	1952	1993
<b>Northern &amp; Western Europe (18)</b>					
Andorra	M	N	1993	1995	1994
Austria	R	N	1918	1992	1997
Belgium	M	N	1831	1993	1999
Denmark	M	N	1849	1972	1993
Germany	R	N	1949	1999	1998
Iceland	R	N	1944	1996	1991
Ireland	R	N	1937	1997	1997
Italy	R	N	1948	1999	1998

*continues*

States with parliamentary executives (56) (continued)

Table 22

Region/country	Republic (R) or monarchy (M)	Member of Commonwealth	Year established	Year current head of state came to power	Year current prime minister came to power
Liechtenstein	M	N	1921	1984	1993
Luxembourg	M	N	1868	1964	1995
Malta	R	Y	1974	1999	1998
Monaco	M	N	1911	1949	1997
Netherlands	M	N	1814	1980	1994
Norway	M	N	1814	1991	1997
San Marino	R	N	1600	rotating	rotating
Spain	M	N	1978	1975	1996
Sweden	M	N	1809	1973	1996
United Kingdom	M	Y	1689	1952	1997
<b>Oceania (8)</b>					
Australia	M	Y	1901	1952	1996
Fiji	R	Y	1987	1994	1999
New Zealand	M	Y	1853	1952	1997
Papua New Guinea	M	Y	1975	1975	1999
Samoa	R	Y	1962	1962	1998
Solomon Islands	M	Y	1978	1978	1997
Tuvalu	M	Y	1978	1978	1999
Vanuatu	R	Y	1980	1999	1998

An analysis of the data in Table 22 reveals that 44, or 79%, of the heads of the parliamentary executives in the world, either prime ministers or chancellors, had, in 1999, been in office for fewer than five years. This reflects the effective functioning of multiparty politics in these liberal and emergent democracies. However, six prime ministers and chancellors had been in power for more than seven years, securing re-election several times. These included Mahathir bin Mohamad in Malaysia (1981), James Mitchell in St Vincent and the Grenadines (1984), and Goh Chok Tong in Singapore (1990).

### 4.3 The limited presidential executive

The limited presidency is the most common form of political executive in the world today, 77 states having adopted it, embracing 31% of the global population, and half the world's land area. It should be noted, however, that 46 of the countries listed in Table 23 are emergent democracies which have only very recently adopted this type of executive, having moved from unlimited presidential, military, or communist executive systems. Their ability to sustain this form of demo-

cratic government must, therefore, be viewed with caution. Nevertheless, it is significant that it has been the presidential, rather than the parliamentary, which has been the most popular executive type adopted by newly democratized states. This is shown by the fact that between 1988 and 1999 the number of states with parliamentary executives advanced by more than a quarter, from 43 to 56, while the number with limited presidential executives more than doubled, from 35 to 72. One region which has provided an exception to this trend has been South Asia where, since 1988, Pakistan and, later, Bangladesh moved from presidential to parliamentary executives, with Sri Lanka promising to follow suit.

Derived from the Latin *praesidens*, the term president has a classical meaning of one who superintends, rules, or directs. In the modern world it is used to signify the head of state in a republic. It includes the ceremonial, and often indirectly elected, heads of state of the 25 republics which have parliamentary executives; the autocratic executive heads of state of nationalistic socialist and authoritarian nationalist regimes, who are designated here as 'unlimited presidents'; and the popularly elected, usually directly, although sometimes indirectly, heads of state and government in liberal and emergent democracies, referred to here as 'limited presidents'.

The clearest, though also the most extreme, example of the limited presidential model is provided by the United States and, although there are practical differences between individual systems, many of the features found in the United States are replicated elsewhere. Like parliamentary executives, all limited presidential executives occur in multiparty liberal (26) or emergent democracies (46). The full list, with geographical distributions, is given in Table 23.

A general point which emerges from this table is the predilection for this system of executive in the mainland countries of the Americas. Of the 21 states in this broad region, only two, Belize and Canada, have differing executive systems. Both of these former British colonies have parliamentary executives. For the remaining states of the region, which secured independence from the early 19th century onwards, the influence of United States' political and constitutional conventions and republican ideals is clear. In addition, limited presidential systems are particularly common in the larger states of the world. This is shown by an analysis of the data in Table 21. Two-thirds of states with limited presidential executives have areas in excess of 100,000 square kilometres and 43% have populations greater than 10 million.

As already noted, the limited presidential executive form of government has been a popular model to be adopted in recent years by newly emergent or re-established democracies in the Americas, Oceania, and Asia, the most prominent recently being Argentina, Brazil, the Philippines, South Korea, and Taiwan, as well as in Africa and Central and Eastern Europe. One factor influencing its adoption by such states is its attractive image as a modern form of government for democratic republics. In contrast, as noted above, parliamentary systems are found most commonly in older states, often where there is a hereditary, ceremonial head of state. Another important factor is the perceived need, in newly emergent democracies, for the head of state to act as a strong and charismatic unifying force, exemplified, for example, by Corazon Aquino in the Philippines between 1986 and 1992, Lech Wałęsa in Poland 1990–95, and Nelson Mandela in South Africa since 1994. As a consequence, these states have opted for a directly elected presidential executive, enjoying a clear national mandate, in preference to an indirectly elected parliamentary executive.

There are four key features present in a limited presidential executive:

1. Presidents are elected for a fixed term to perform the dual role of head of state and head of government. As head of state they occupy a mainly ceremonial position and are the focus of popular patriotism. As head of government they lead the executive branch of government, and are usually head of the armed forces and the state civil service. Also, as head of government, they are in charge of foreign affairs and are the main initiator of legislation.
2. Presidents' tenure are secure unless they commit a grave unconstitutional act. The US president, for example, cannot be removed by Congress except by impeachment.
3. Presidents govern with an advisory cabinet of non-elected departmental secretaries, whom they choose and appoint and who are fully responsible to them.
4. Presidential powers are limited by the need for the approval of the assembly for certain executive actions. Under the US Constitution, for example, congress has sole legislative powers and the president's veto of acts of Congress can be overridden by a two-thirds vote. Although presidents are expected to provide national leadership, their ability to do so is constrained by their ability to carry congress with them. The US Senate, in particular, has strong counterbalancing powers whereby presidents can only make key federal appointments, judicial and cabinet, with Senate approval. Foreign treaties require a two-thirds majority of the Senate before coming into effect.

It is this balanced relationship between the president of the United States and Congress, as well as the clear statement of their respective roles written into the Constitution, which make the presidency, although powerful, a limited form of executive and it is these features which are found in the other 72 states whose political executives fall into this category. The degrees of emphasis differ, however, as do the arrangements for the election of presidents, the restrictions on their length and terms of office, and the presence or absence of a separately elected prime minister, in the legislature.

In Botswana, Guyana, the Marshall Islands, Micronesia, Nauru, South Africa, Suriname, and Switzerland, for example, the presidential executive operates in many ways like a parliamentary one, being chosen by the legislature. In Switzerland the presidency is collective or collegial, comprising all seven members

States with limited presidential executives (72)

Table 23

Region/country	Year established	Year current head of state came to power	Region/country	Year established	Year current head of state came to power
<b>Asia (5)</b>			Mauritania	1991	1984
Indonesia	1999	1998	Mozambique	1990	1986
Korea, South	1987	1998	Namibia	1990	1990
Kyrgyzstan	1990	1990	Nigeria	1999	1999
Mongolia	1990	1997	São Tomé	1990	1991
Taiwan	1987	1988	Seychelles	1991	1977
<b>Central America &amp; Caribbean (8)</b>			Sierra Leone	1998	1998
Costa Rica	1821	1998	South Africa	1993	1999
Dominican Republic	1962	1996	Tanzania	1995	1995
El Salvador	1982	1999	Togo	1993	1967
Guatemala	1975	1996	Zambia	1991	1991
Honduras	1982	1998	<b>Middle East &amp; North Africa (3)</b>		
Mexico	1917	1994	Algeria	1995	1999
Nicaragua	1979	1997	Egypt	1971	1981
Panama	1989	1999	Yemen	1990	1990
<b>Central, Eastern, &amp; Southern Europe (8)</b>			<b>North America (1)</b>		
Bosnia-Herzegovina	1990	1990	United States	1776	1993
Croatia	1990	1990	<b>Northern &amp; Western Europe (1)</b>		
Cyprus	1960	1993	Switzerland	1874	1999
Georgia	1992	1992	<b>Oceania (6)</b>		
Moldova	1990	1997	Kiribati	1979	1994
Russia	1990	1990	Marshall Islands	1979	1997
Ukraine	1990	1994	Micronesia, Federated States of	1979	1999
Yugoslavia	1990	1997	Nauru	1968	1999
<b>Central &amp; Southern Africa (28)</b>			Palau	1981	1992
Angola	1991	1979	Philippines	1987	1998
Benin	1990	1996	<b>South America (12)</b>		
Botswana	1966	1998	Argentina	1983	1989
Burkina Faso	1991	1987	Bolivia	1982	1997
Cameroon	1991	1982	Brazil	1985	1995
Cape Verde	1992	1991	Chile	1990	1994
Central African Republic	1995	1993	Colombia	1978	1998
Côte d'Ivoire	1990	1993	Ecuador	1979	1998
Gabon	1991	1967	Guyana	1966	1997
Gambia	1997	1994	Paraguay	1989	1999
Ghana	1992	1981	Peru	1978	1990
Guinea	1991	1984	Suriname	1988	1996
Kenya	1997	1978	Uruguay	1985	1995
Liberia	1997	1997	Venezuela	1961	1999
Madagascar	1992	1993			
Malawi	1994	1994			
Mali	1992	1992			

of the Federal Council (Bundesrat), one of whom is selected annually to assume the formal title of President of the Swiss Confederation (Bundespräsident).

In general, it would be true to say that few states with

limited presidential executives approach the high degree of dispersal of power that exists in the United States. Arguably, those in South America and the Philippines come closest. As a consequence, the effec-

tive authority of most of the presidents included in Table 23 significantly exceeds that of the US chief executive. In a number of emergent democracies, the most prominent examples being Egypt, Guyana, Mexico, and a number of African states, true competition from opposition parties remains limited, further enhancing presidential authority. There are also some states, notably Angola, Chile, Ghana, Indonesia, Mozambique, Peru, and Taiwan, where the military remains an influential force. In such cases, the presidential system can be viewed as only partially limited.

An analysis of Table 23 reveals that 34, or 47%, of the heads of limited presidential executives had, in 1999, been in office for fewer than five years. Fourteen, or 19%, had been in power for at least a decade and two, the presidents of Gabon and Togo, had been in office since the mid-1960s. However, the latter had originally been presidents in one-party states which had only recently become multiparty. In liberal democratic states in 1998, only one president, that of Egypt, had been in power for more than nine years. The imposition of term limits, preventing a president from serving more than a stipulated number of, often consecutive, terms, has been an important factor in restricting presidential tenures in many other liberal and emergent democratic states. In seven states, Colombia, Costa Rica, Guatemala, South Korea, Paraguay, the Philippines, and Switzerland, presidents are restricted to one term in office. In 25 states, which include Argentina, Brazil, Cameroon, Georgia, Moldova, Nicaragua, Peru, Russia, Ukraine, the United States, and Venezuela, the limit is set at two terms. In four states, Angola, Mozambique, Namibia, and the Seychelles, there is a three-term limit. In contrast, in parliamentary executive systems no formal term limits are imposed, although in Japan they have been operated informally for much of the postwar period by the ruling Liberal Democratic Party, which has regularly changed its leader biennially.

Finally, in some states with a limited presidential executive a relatively high minimum age limit is set for candidates, in an effort to ensure that politicians of experience and judgement are elected. In the United States for example, a minimum age of 35 years is stipulated, five years higher than that required for a senator. A similar minimum age has been set in Brazil and Poland, while in the Philippines and Mongolia the respective minimum ages are 40 and 45 years.

## 4.4 The dual executive

The dual executive is found in four liberal and 13 emergent democracies, the most notable example being France. There are significant differences between the 17 cases, however, and, although the French system is usually cited as the model, it should not be assumed that the others contain all, or even most, of the French features. In Albania, Chad, the Czech Republic, Estonia, Finland, France, Haiti, Lebanon, Lithuania, Macedonia, Poland, Portugal, Romania, Slovenia, and Sri Lanka the executive consists of a working partnership between the president and the prime minister, while in Cambodia and Morocco the partnership is between the monarch and the prime minister. In Haiti, until recently, the military also retained significant influence. The full list is given in Table 24.

Although not really a 'model' of the other systems, a description of how the dual executive operates in France will be helpful to an understanding of the variations which are found in other countries.

The constitution for the French Fifth Republic was framed in the short time span of three months, during the summer of 1958, while the new administration of Charles de Gaulle was settling into office. Conscious of the recent history of instability in French governments, its authors tried to combine elements of the United States and British constitutions, while, at the same time, seeking to strengthen the executive and encourage greater party discipline and stability. To these ends, provision was made for a two-headed executive of a president, to be elected by an electoral college for a seven-year term, and a prime minister, chosen by the president but responsible to the National Assembly.

Under the terms of the constitution the president has considerable powers, including, as well as the appointment of the prime minister, control of the armed forces, the right to preside over cabinet and Defense Council meetings, the right to dissolve the Assembly once a year, and powers to negotiate treaties, counter-sign legislation approved by the Assembly, and appoint ambassadors.

Nevertheless, the constitution made provision (Articles 20 and 21) for the prime minister and Council of Ministers to wield ultimate power while the president was expected to remain aloof from day-to-day government and act as a mediator and conciliator, who

States with dual executives (17)

Table 24

Country/region	Year established	Year current head of state came to power	Year current prime minister came to power
<b>Asia (2)</b>			
Cambodia	1991	1991	1985
Sri Lanka	1978	1994	1994
<b>Central America &amp; Caribbean (1)</b>			
Haiti	1987	1996	1999
<b>Central, Eastern, &amp; Southern Europe (8)</b>			
Albania	1997	1997	1998
Czech Republic	1989	1989	1998
Estonia	1990	1992	1999
Lithuania	1990	1998	1999
Macedonia	1992	1991	1998
Poland	1997	1995	1997
Romania	1992	1996	1998
Slovenia	1990	1990	1992
<b>Central &amp; Southern Africa (1)</b>			
Chad	1996	1990	1997
<b>Middle East &amp; North Africa (2)</b>			
Lebanon	1926	1998	1998
Morocco	1992	1999	1998
<b>Northern &amp; Western Europe (3)</b>			
Finland	1917	1994	1995
France	1958	1995	1997
Portugal	1976	1996	1995

ensured that the different factions, in whatever coalition was formed on the basis of Assembly support, worked successfully together.

The respective roles of president and prime minister were altered when, in October 1962, President de Gaulle forced through, by referendum, a change in the constitution making the president directly elected by the people. This gave him a justifiable claim of popular support and he and his immediate successors used this to dominate policy-making so that the prime minister became, in effect, the political servant of the president, who governed in the style of the US presidency, but without the Congressional checks and balances which limit it.

As long as the French president was able to appoint a prime minister amenable to his directions and acceptable to the National Assembly, the unbalanced twin executive worked. In 1986, however, following Assembly

elections which swept to power the opposition conservative coalition, President Mitterrand was forced to appoint a prime minister, Jacques Chirac, whose political stance was well to the right of his. An experiment of 'cohabitation' thus began, in which the prime minister assumed the upper hand. This lasted, at times uneasily, until the presidential and Assembly elections of April–June 1988, which were won by President Mitterrand and his Socialist Party. This restored the status quo until there was a further period of 'cohabitation' between 1993 and 1995, with Edouard Balladur as prime minister, and since 1997, this time between a Gaullist president, Jacques Chirac, and a socialist-party prime minister, Lionel Jospin. The periods of 'cohabitation' proved that the constitution was sufficiently flexible to allow a president and prime minister from different parts of the political spectrum to work together, if need be, for an interim period, with reasonable success.

The dual executive in Lebanon closely resembles that of France but the relationship between the president and prime minister is as much conditioned by religious as political factors. With the object of maintaining religious harmony, the president is always, by tradition, a Christian and the prime minister a Muslim. The president is elected for a six-year, nonrenewable, term by the National Assembly.

In Finland, the dual executive is also very similar to that of France, with the president, who is popularly elected for a renewable six-year term, having responsibility for foreign affairs, the dissolution of the Eduskunta (parliament), the formation and dismissal of governments, and the appointment of senior civil servants. The president also has substantial veto powers over legislation passed by the Eduskunta and more limited decree powers. The multiparty, coalition nature of Finnish politics has served to enhance the effective role of the president, as, until 1991, did the sensitivity and importance of foreign relations with Finland's neighbor, the Soviet Union. This was particularly the case 1956–81 when Urho Kekkonen, of the Center Party of Finland (KP), was president and used the office to ensure the continuance in power of center-left parliamentary coalitions, and to promote a foreign policy of 'active neutrality', despite a dwindling in electoral support. In recent years, however, there have been proposals to significantly reduce presidential powers in the legislative and executive spheres.

The Portuguese variant of the dual executive has been evolving since the adoption of a new constitution in 1976. To effect a smooth transition to civilian government after a long period of dictatorship and military rule, the role of the president was cast as a 'watchdog' for the army, to ensure that its interests were not neglected by a civilian prime minister. The relationship between the two parts of the executive depended as much on personalities as on constitutional rules. The revised constitution of 1982 reduced the powers of the presidency and four years later the first civilian for 60 years was elected to that office. Political power is now weighted towards the prime minister but he does not yet head a genuine parliamentary executive.

The Sri Lankan constitution of 1978 is based loosely on the French model and provides for a directly elected president and a prime minister, drawn from the assembly, who is appointed by the president and acts as his or her 'parliamentary manager'. The president has considerably more powers than the prime minister and can hold several portfolios. Sri Lanka thus represents a weak form of dual executive, compared with the French

version, yet falls short of being a full presidential executive, as in the United States. In 1994 Chandrika Bandaranaike Kumaratunga was popularly elected president and appointed her mother, Sirimavo Bandaranaike, prime minister, creating a unique family 'dual executive'. It is intended to re-establish a parliamentary form of executive in Sri Lanka.

In Morocco the executive partnership is between the monarch and the prime minister but, until the constitutional reforms of 1992, it was a very one-sided affair, with the king holding a near monopoly of power.

In newly democratized Cambodia, the dual executive also takes the form of power-sharing between a monarch and a prime minister. Father and son, King Norodom Sihanouk and Prince Norodom Ranariddh, occupied these respective positions between 1993 and 1997, although the latter shared power with a 'dual prime minister', the ex-communist leader Hun Sen.

In the four states of the Czech Republic, Estonia, Lithuania, and Slovenia in Central Europe, the executive types are substantially parliamentary, but the directly elected presidents currently retain sufficient authority for the designation 'dual executive' to be applied. In the Czech Republic the position of president is now chiefly ceremonial, but the current incumbent, Vaclav Havel, as leader of the freedom struggle, retains charismatic and moral authority. In the five states of Albania, Chad, Macedonia, Poland, and Romania, political authority has moved gradually away from the president towards the prime minister, over recent years.

A limit of two terms has been set for the presidents of ten states with dual executives: Albania, Chad, the Czech Republic, Estonia, Lithuania, Poland, Portugal, Romania, Slovenia, and Sri Lanka. In Estonia and Lithuania candidates for the presidency must be at least 40 years old.

The dual executives of the 17 states shown in Table 24 demonstrate the variety of ways in which a constitution can be adapted to suit the circumstances of a particular political environment at a particular time.

## 4.5 The communist executive

Until recently the Soviet Union provided the 'classic' example of a communist political executive, with its interlocking web of party and state personnel and interests, culminating in a concentration of power at the apex of the political system. Now, however, the Soviet Union has been dissolved and emergent democratic Russia has a limited presidential form of political executive. It is in socialist China where the dominant



States with communist executives (5)

Table 25

Country/region	Year established	Year current head of state came to power	Year current prime minister came to power
<b>Asia (4)</b>			
China	1949	1993	1998
Korea, North	1948	1994	1997
Laos	1975	1998	1998
Vietnam	1945	1997	1997
<b>Central America &amp; Caribbean (1)</b>			
Cuba	1959	1959	1959

model of the communist political executive is today best located.

In a communist system it is the party which determines policy objectives and it is the state apparatus which implements them. Whereas in a liberal democratic country, such as the United States, the constitution determines the distribution and exercise of power, in a communist country the constitution is subservient to the needs of the state, as interpreted by the party. In fact, constitutions are fairly frequently changed to meet party requirements.

In a communist state there is a directly or indirectly elected National Assembly, Supreme Soviet ('soviet' means elected council), or People's Congress, which is, constitutionally, but not in reality, the supreme body of state power. In China the National People's Congress comprises nearly 3,000 members, but meets only briefly for several weeks each year, devolving its powers to a smaller, approximately 134-member permanent Standing Committee, and electing from its membership a Council of Ministers (COM) or state council, as the equivalent of a formal government. The COM, with around 40 members, is headed by a chairman who is the equivalent of a prime minister. There is also a state president, who is elected by the legislature.

The state machinery of the COM, its chairman, and the state president are the external, constitutional, manifestations of political power, but the real power in a communist state lies within the Communist Party, which ensures its hold on policy-making through its membership of the state institutions and the policy of 'nomenklatura'. This means that key posts throughout society and government, including positions in the legislature, are reserved for persons of 'sound' judgement who have been vetted and approved by the party's apparatus.

In China it is in the approximately 340-member Central Committee of the Communist Party where true authority can first be perceived and it is in the Politburo, a 12–25-member cabinet body which is 'elected' by the Central Committee and meets weekly, and the smaller Secretariat, its administrative and policy-formulating wing, where ultimate power lies. Leading members of these bodies, at the apex of the party, also hold key positions, including those of prime minister and state president. Indeed, it is usual for the general-secretary of the Party, who is the country's effective political leader, to take a major state position as a formal insignia of office. Thus the Chinese Communist Party's general-secretary, Jiang Zemin, is also state president. However, his real power derives from his position as head of the Party.

In China, where the People's Liberation Army (PLA) played a key role in the 'liberation struggle' during the 1940s and which crushed a popular prodemocracy movement in 1989, the armed forces retain significant behind-the-scenes political influence. They are also influential in Vietnam, North Korea, and Cuba.

The distribution of states with communist, or, as they should more correctly be termed, socialist, executives and their date of establishment are set out in Table 25. They are found exclusively in Asia and the Caribbean. In Cuba, a personalized, plebiscitarian form of leadership prevails, with Fidel Castro, the leader of the 'communist revolution' providing charismatic leadership. In North Korea, a 'socialist dynasty' is in place, with the 'Great Leader' Kim Jong Il succeeding his father, Kim Il Sung, the self-designated 'Sun of Mankind', on the latter's death in 1994. In both China and Vietnam significant parts of the economy have been opened to market forces and private initiative. Still, however, in all cases, control of the state, including

large parts of the economy, through the party, is the dominant, and clearly recognizable, characteristic. It is this, more than anything else, that distinguishes communist from other one-party states. Despite the small number (5) of states falling into this executive category, they embrace, in total, nearly a quarter of the world's population.

## 4.6 The unlimited presidential executive

The term 'unlimited' is used to describe the executive presidency in one-party, noncommunist states, but in politics, of course, nothing is really unlimited. Even the seemingly all-powerful military dictator can be, and is at times, overthrown. Nevertheless, the 22 states which have been classified as nationalistic socialist, authoritarian nationalist, and Islamic nationalist, have considerably fewer limitations on their political executives than those in their liberal and emergent democratic counterparts. These states comprise a twelfth of the world's population.

As in communist systems, the party is the ultimate source of power but, unlike some communist states, a strong, and sometimes charismatic, leader often predominates and the objectives of the party, even in socialist states, are subordinated to national interests. Most of the countries with this type of executive have comparatively short histories of release from rule by a colonial power and have felt the need to assert their independence. Many, also, have tribal, ethnic, or regional differences which require strong leadership if all social groups are to cohere into a single state. More than half of the countries with unlimited presidential executives are to be found located in Africa and the adjoining Middle East.

Despite this regional concentration, these states display considerable variations in their political systems and it is something of a distortion to group them together in this way. Some have, for example, histories of instability and their current leaders have reached the top through a bloody or bloodless military coup. This has been the experience of Azerbaijan, the Republic of Congo, Iraq, Libya, and Syria, for example. Some, such as Afghanistan, Eritrea, Iraq, Rwanda, and Tajikistan, have been racked by recent wars and border insurgency. In contrast, other states, such as Kazakhstan, the Maldives, and Senegal, have strong records of political stability.

**States with unlimited presidential executives (22)**

**Table 26**

Region/country	Year established	Year current head of state came to power
<b>Asia (6)</b>		
Afghanistan	1992	1996
Kazakhstan	1990	1990
Maldives	1968	1978
Tajikistan	1991	1992
Turkmenistan	1990	1990
Uzbekistan	1990	1990
<b>Central, Eastern, &amp; Southern Europe (3)</b>		
Armenia	1990	1998
Azerbaijan	1993	1993
Belarus	1994	1994
<b>Central &amp; Southern Africa (8)</b>		
Congo, Republic of	1997	1997
Djibouti	1977	1999
Equatorial Guinea	1979	1979
Eritrea	1993	1993
Rwanda	1978	1994
Senegal	1963	1981
Uganda	1986	1986
Zimbabwe	1980	1980
<b>Middle East &amp; North Africa (5)</b>		
Iran	1979	1997
Iraq	1970	1979
Libya	1969	1969
Syria	1971	1971
Tunisia	1987	1987

Nevertheless, their political executives have certain features in common, including a much greater authoritarianism than is found in liberal and emergent democratic states. This results mainly from the absence of competition and choice, which an effectively functioning multiparty political system clearly provides. They have no opposition party 'waiting in the wings' to take over should the electorate express a wish for a change. Many unlimited executive states do now formally tolerate opposition groupings but elections are so heavily stacked in the governing party's favor, through its control of the media and state sector resources, and through resort to electoral chicanery, that there is little or no possibility of its being defeated.

The importance of the political leader in such states cannot be overstressed. Some have been in office for

much longer periods than their counterparts in liberal democratic states could ever hope for. This longevity is illustrated in Table 26. The average tenure of an unlimited president was, in 1999, 11 years. Seven, or 32%, had been in office for 15 years or more, with several having become virtual legends. Muammar al-Kadhafi has dominated politics in Libya since 1969, and Hafez al-Assad in Syria since 1971. Meanwhile, in the former Soviet states of Central Asia, powerful new personality cults have been established in Turkmenistan and Uzbekistan, suggesting that Presidents Niyazov, the officially styled 'leader of the Turkmen', and Karimov intend to remain in power for a considerable period. However, a limit of two or three presidential terms is officially in place in Armenia, Senegal, Tanzania, and Uzbekistan.

In Iran, on the other hand, the focus of leadership in recent years has tended to shift from one individual to another, as different factions have wrestled for power. Until his death in 1989, the religious leader Ayatollah Khomeini, a revered, charismatic figure, seemed to have the strongest voice, but, at times, the pragmatic Speaker of the Assembly, Hojatoleslam Ali Akbar Rafsanjani, was more influential. He served as president between 1989 and 1997. He was replaced by Sayed Muhammed Khatami who has who has further shifted power away from the country's 'spiritual leader', Ayatolla Sayed Ali Khomeini. In Afghanistan political conditions have been anarchic since the overthrow of the former Soviet-installed administration and, before the coming to power of the fundamentalist Talibaan in 1996, the real political controllers appeared to be regionally-based warlords and Islamic mujaheddin forces.

To people accustomed to life in liberal democratic political systems the concept of one-party government and strong personal leadership may seem repressive and

undemocratic. It would be unwise, however, to make such a sweeping judgement. A country's political system is, inevitably, the product of its history, culture, and resource base, and the majority of the states with unlimited presidential executives are still on a 'learning curve' in their political development. Indeed some systems are so volatile that there are fundamental changes currently taking place or likely to become evident in the foreseeable future. In other cases, particularly across Africa, the system of one-party monopoly is still firmly embedded in some states, drawing its sustenance from older tribal political traditions, with their inclusive decision-making processes, and from the argument that open democracy, with its costly campaigns and interparty quarrels, is an indulgence that cannot yet be afforded.

## 4.7 The military executive

Of the eight states listed in Table 27 as having military executives, six are in Central and Southern Africa and one is in Asia. Many share a common feature, a long record of military conflicts and coups. For good or ill, in each case the army has established order, though often at the expense of the loss of civil liberties.

Some countries have seen the pendulum swing from civilian to military rule with bewildering frequency. Burkina Faso, for example, has experienced no less than six coups in 30 years and Thailand 17 since its absolute monarchy was abolished in 1932. In Latin America, unusually without a military executive in 1999, and Central and Southern Africa as a whole, three-quarters of the 68 states have endured at least one military coup since 1960.

Some have suffered long periods of genuinely despotic rule. Jean-Bedel Bokassa, of the Central

**States with military executives (8)**

**Table 27**

Region/country	Year first established	Most recent coup	Year current head of state came to power
<b>Asia (1)</b>			
Myanmar	1962	1988	1992
<b>Central &amp; Southern Africa (7)</b>			
Burundi	1996	1996	1996
Comoros	1975	1999	1999
Congo, Democratic Republic of	1997	1997	1997
Guinea-Bissau	1999	1999	1999
Niger	1974	1999	1999
Somalia	1969	1991	1991
Sudan	1969	1989	1989

African Republic, who was in power between 1965 and 1979, almost brought his nation to economic ruin through his personal excesses, which included an elaborate ceremony to crown him emperor. The Duvalier family ruled Haiti between 1957 and 1986 like gang bosses with their own private armies. In Burundi, in Central Africa, military rule has been ruthlessly used to sustain tribal despotism, in particular the economic and political pre-eminence of the minority Tutsis over the majority Hutu community.

In contrast, some military rulers have brought great political stability. General Alfredo Stroessner of Paraguay enjoyed absolute power, without any real challenge, for 35 years, from 1954 to 1989, by dealing swiftly and harshly with dissidents and astutely allowing potential rivals to share in the spoils of office, while in Indonesia the later civilian ruler, Suharto, remained at the helm from 1967 to 1998, promoting economic development.

The policies pursued by some military regimes, most especially those in South America, have been strongly reactionary and conservative, designed to protect the interests of narrow business elites and stifle popular social movements. Others, often drawing their leaders and in-service support from the middle officer ranks, have pursued radical economic and social policies. These reformist regimes, usually having been prompted to seize power because of the corrupt excesses of preceding civilian administrations, have also tended to follow puritanical governing styles. The most notable contemporary examples are the populist regimes of Flight-Lieutenant Jerry Rawlings in Ghana and Captains Thomas Sankara (1983–87) and Blaise Compaore (1987– ) in Burkina Faso. Both Rawlings and Compaore are elected civilian presidents.

The identification of the six military states has been comparatively straightforward but, inevitably, a little arbitrary. In at least a further 30 states classified under other categories the military remains an influential background political force. These include 20 countries identified as limited presidential executives: Algeria, Angola, Burkina Faso, Chile, Egypt, Gambia, Ghana, Guatemala, Guinea, Indonesia, South Korea, Liberia, Mozambique, Nigeria, Paraguay, Peru, Sierra Leone, Suriname, Taiwan, and Yemen. Ethiopia, Fiji, Lesotho, Pakistan, and Thailand, which have been classified as parliamentary executives, and the dual executives of Cambodia and Lebanon, are other examples of states with a military presence in the background. The armed forces are also influential in the remaining communist

states of Asia and the Caribbean, and in the unlimited presidential executives of Afghanistan, Azerbaijan, Republic of Congo, Equatorial Guinea, Indonesia, Iraq, Libya, Rwanda, and Syria.

Table 27 gives the dates when the military came to power in the six states classified as full military executives. In Burundi and the Democratic Republic of Congo the military takeovers were particularly recent, arising out of broader civil wars. The other four states had been dominated by the military even more strongly for several decades, although there had been brief periods of civilian rule, until the most recent coups.

## 4.8 The absolute executive

With the exception of the Vatican City State, all the states listed in Table 28 as having absolute executives are monarchies of one kind or another. Bahrain, Brunei, Jordan, Kuwait, Oman, Qatar, and Saudi Arabia are all Arab monarchies, sultanates, sheikhdoms, or emirates and the United Arab Emirates is a federation of no less than seven emirates. Bhutan, Swaziland, and Tonga are hereditary monarchies.

Another factor that all the states except the Vatican City State have in common is a history of association with Britain, through either a treaty of protection or trade, or both. In nine of them political parties do not operate at all. In Swaziland there is one party subservient to the ruling regime. Only in Jordan, where the ban imposed on political parties in 1976 was lifted in 1991, have multiparty elections recently been held.

Unlike the military states, the absolute executives have not been imposed following a coup. They have usually been part of the social and political lives of the respective communities for many years, surviving during the colonial period as largely autonomous entities, and the rule, though autocratic, has usually been paternalistic. As such, they could alternatively be designated 'traditional executives'.

The Kingdom of Jordan shows clear evidence of constitutionality, with a written constitutional code and two-chamber assembly, but true democracy has had a fluctuating existence, political activity being banned in 1963, restored in 1971, rebanned in 1976, and restored in 1991. Despite the holding of multiparty elections in 1993, Jordan has not democratized to the extent of Nepal, which had an absolutist system until 1990, and ultimate power remains with the king. In Bhutan, in July 1998, the king gave up his right to nominate the

States with absolute executives (12)			Table 28
Region/country	Year first established	Year current head of state came to power	Written constitution
<b>Asia (2)</b>			
Bhutan	1907	1972	N
Brunei	1984	1968	Y
<b>Central &amp; Southern Africa (1)</b>			
Swaziland	1968	1986	Y
<b>Middle East &amp; North Africa (7)</b>			
Bahrain	1971	1999	Y
Jordan	1946	1999	Y
Kuwait	1961	1977	Y
Oman	1951	1970	Y
Qatar	1971	1995	Y
Saudi Arabia	1932	1982	Y
United Arab Emirates	1971	1971	Y
<b>Northern &amp; Western Europe (1)</b>			
Vatican City State	1377	1978	N
<b>Oceania (1)</b>			
Tonga	1875	1965	Y

cabinet and gave the legislature the power to dismiss him by a two-thirds vote. If these measures prove effective, Bhutan will become a dual executive.

The one universal, and most certain, characteristic of an absolutist regime is that of government by personal, or, in the case of Saudi Arabia, family decree, rather than by collective discussion and agreement, and it is this which merits the description of absolute executive. Seven of the absolutist states are oil-rich and enjoy high per-capita incomes. As a consequence, as Table 10 above shows, the absolutist states enjoyed average per-capita incomes, in 1995, in the region of \$7,347 and high levels of urbanization. A trade-off between political liberty and economic affluence of citizens is evident in states such as Brunei, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates.

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# Legislature, Assemblies, and Congresses

## 5.1 The nature of legislatures

Although in formal, constitutional terms the three branches of government are described as the executive, the judiciary, and the legislature, the term ‘assembly’ has been deliberately preferred for the third arm because the role of the vast majority of legislatures in the world today is deliberative and policy-influencing, rather than law-making. Indeed the old term ‘parliament’, or ‘*parlement*’, which is still used in some political systems and is associated with the French verb *parler*, to talk, best identifies the chamber as an ‘arena’ for debate.

Assemblies do, of course, play a major role in the law-making process but they now mostly legitimize policies presented to them by the executive, rather than initiate them themselves. In doing so, they usually also have a modifying, revising function, based on the concept that assembly members are more likely to have an understanding of what is practical and acceptable to the electorate than politicians in government who, inevitably, become insulated in their positions of power from the real world outside.

Popularly elected assemblies have always epitomized democracy and it is not surprising, therefore, that even the most autocratic rulers have sought to make their regimes ‘respectable’ by establishing a façade of democratization through puppet assemblies.

The 19th century was the ‘golden age’ of assemblies as independent law-making bodies, or, as the American political scientist Nelson Polsby has termed them, ‘transformative legislatures’. The classic example was the Parliament in London where individual members had a genuine role to play before they were to become overwhelmed by the tyranny of the party system and the burgeoning, and increasingly specialist, scope of legislative affairs. Since that time the balance of power has shifted inexorably towards the executive until we are left with but a few shining examples of assemblies

which can, and do, wield real political power. The most notable ‘transformative legislature’ today is undoubtedly the US Congress. Its position is buttressed by the clear separation of powers that is provided for by the US Constitution, the weakness of party discipline, the powerful standing committee structure, and by the large private offices and staff support with which individual members of the House of Representatives and Senate are provided. It is closely followed by the Riksdag of Sweden, with the States-General in the Netherlands, the Parlamento, comprising the Camera dei Deputati and Senato, in Italy, and the Legislative Assembly in Costa Rica also being influential bodies. Assemblies elsewhere are mostly pale shadows of these and can be categorized as ‘arena legislatures’, being ‘settings for the interplay of significant political forces’ as executive actions are debated and scrutinized.

Despite the relative decline in importance of assemblies, they still operate in the vast majority of states and are found within a wide range of ideologies and work alongside all types of political executive. Table 29 gives the basic facts about them, showing that at the present time only seven of the 192 states under consideration do not have active assemblies as a normal feature of their political structures. These nations, Bahrain, Brunei, Oman, Qatar, Saudi Arabia, the United Arab Emirates, and the Vatican City State, are all absolutist states and, with the exception of Bahrain between 1973 and 1975, have never had popularly elected assemblies. However, in each of them there are appointed consultative councils which provide advice to the political executive. In addition, Qatar has an elected central municipal council. In a number of other states, specifically those, with military regimes or which are experiencing civil war, the assemblies described in Table 29 are, in most cases, currently in abeyance. For example, in Myanmar the 485-member Constituent Assembly, which was popularly elected in May 1990 and is dominated by opponents of the military regime, has not

Assemblies of the world

Table 29

Region/country	Name of lower house	Number of lower house members	Lower house term (years)	Lower house electoral system
<b>Asia</b>				
Afghanistan	—	N/A	N/A	N/A
Bangladesh	Parliament (Jatiya Sangsad)	330	5	simple plurality
Bhutan	National Assembly	150	3	mixed-elected/appointed
Brunei	—	N/A	N/A	N/A
Cambodia	National Assembly	122	5	simple plurality
China	National People's Congress	2,979	5	indirect
India	Lok Sabha	545	5	simple plurality
Indonesia	House of Representatives	500	5	proportional representation-party list
Japan	House of Representatives	500	4	proportional representation-additional member system
Kazakhstan	Majlis	67	4	second ballot
Korea, North	Supreme People's Assembly	687	5	simple plurality
Korea, South	National Assembly	299	4	proportional representation-additional member system
Kyrgyzstan	Legislative Assembly	38	5	second ballot
Laos	National Assembly	99	5	simple plurality
Malaysia	House of Representatives	192	5	simple plurality
Maldives	Majlis	50	5	mixed-elected/appointed
Mongolia	People's Great Hural	76	4	second ballot
Myanmar	Constituent Assembly (suspended)	485	transitional	simple plurality
Nepal	House of Representatives	205	5	simple plurality
Pakistan	National Assembly	217	5	simple plurality
Singapore	Parliament	83	5	simple plurality
Sri Lanka	National State Assembly	225	6	proportional representation-party list
Taiwan	Legislative Yuan	225	3	proportional representation-additional member system
Tajikistan	Supreme Assembly	181	4	second ballot
Thailand	House of Representatives	400	4	proportional representation-additional member system
Turkmenistan	Majlis	50	5	second ballot
Uzbekistan	Supreme Assembly	250	5	second ballot
Vietnam	National Assembly	450	5	second ballot
<b>Central America &amp; Caribbean</b>				
Antigua	House of Representatives	17	5	simple plurality
Bahamas	House of Assembly	40	5	simple plurality
Barbados	House of Assembly	28	5	simple plurality
Belize	House of Representatives	29	5	simple plurality
Costa Rica	Assembly	57	4	proportional representation-party list
Cuba	National Assembly	601	5	second ballot
Dominica	Assembly	30	5	mixed-elected/appointed
Dominican Republic	Chamber of Deputies	149	4	proportional representation-party list
El Salvador	National Assembly	84	3	proportional representation-additional member system
Grenada	House of Representatives	15	5	simple plurality
Guatemala	National Congress	80	5	proportional representation-additional member system

*continues*



Assemblies of the world (continued)

Table 29

Region/country	Name of lower house	Number of lower house members	Lower house term (years)	Lower house electoral system
Haiti	Chamber of Deputies	83	5	second ballot
Honduras	National Assembly	128	4	proportional representation-party list
Jamaica	House of Representatives	60	5	simple plurality
Mexico	Chamber of Deputies	500	3	proportional representation-additional member system
Nicaragua	National Assembly	93	5	proportional representation-party list
Panama	Legislative Assembly	71	5	simple plurality
St Kitts and Nevis	National Assembly	14	5	simple plurality
St Lucia	House of Assembly	17	5	simple plurality
St Vincent	House of Assembly	21	5	simple plurality
Trinidad and Tobago	House of Representatives	36	5	simple plurality
<b>Central, Eastern, &amp; Southern Europe</b>				
Albania	People's Assembly	155	4	proportional representation-additional member system
Armenia	National Assembly	131	4	proportional representation-additional member system
Azerbaijan	National Assembly	125	4	proportional representation-additional member system
Belarus	House of Representatives	110	4	second ballot
Bosnia-Herzegovina	House of Representatives	42	transitional	proportional representation-party list
Bulgaria	National Assembly (Duma)	240	5	proportional representation-party list
Croatia	Chamber of Representatives	127	4	proportional representation-party list
Cyprus	House of Representatives	80	5	simple plurality
Czech Republic	Chamber of Deputies	200	4	proportional representation-party list
Estonia	Parliament	101	4	proportional representation-party list
Georgia	Parliament	235	4	proportional representation-additional member system
Greece	Parliament	300	4	proportional representation-party list
Hungary	National Assembly	386	4	proportional representation-additional member system
Latvia	Parliament (Saeima)	100	4	proportional representation-party list
Lithuania	Parliament (Seimas)	141	4	proportional representation-additional member system
Macedonia	National Assembly	120–140	4	second ballot
Moldova	Parliament	104	4	proportional representation-party list
Poland	Sejm	460	4	proportional representation-party list
Romania	Chamber of Deputies	343	4	proportional representation-party list
Russia	State Duma	450	4	proportional representation-additional member system
Slovakia	National Council	150	4	proportional representation-party list
Slovenia	National Assembly	90	4	proportional representation-additional member system
Turkey	National Assembly	550	5	proportional representation-party list
Ukraine	Supreme Council	450	4	proportional representation-additional member system
Yugoslavia	Chamber of Citizens	138	4	proportional representation-additional member system

*continues*

## Assemblies of the world (continued)

Table 29

Region/country	Name of lower house	Number of lower house members	Lower house term (years)	Lower house electoral system
<b>Central &amp; Southern Africa</b>				
Angola	National Assembly	220	4	proportional representation-party list
Benin	National Assembly	83	4	proportional representation-party list
Botswana	National Assembly	47	5	simple plurality
Burkina Faso	Assembly of People's Deputies	111	5	proportional representation-party list
Burundi	National Assembly	81	5	proportional representation-party list
Cameroon	National Assembly	180	5	proportional representation-party list
Cape Verde	National Assembly	72	5	simple plurality
Central African Republic	National Assembly	109	5	second ballot
Chad	National Assembly	125	4	second ballot
Comoros	Federal Assembly	43	4	second ballot
Congo, Democratic Republic of	(suspended)	—	—	—
Congo, Republic of	National Transitional Council	75	transitional	appointed
Côte d'Ivoire	National Assembly	175	5	second ballot
Djibouti	Chamber of Deputies	65	5	simple plurality
Equatorial Guinea	House of Representatives	80	5	proportional representation-party list
Eritrea	Transitional National Assembly	150	transitional	mixed-elected/appointed
Ethiopia	Council of People's Representatives	548	5	simple plurality
Gabon	National Assembly	120	5	mixed-elected/appointed
Gambia	National Assembly	49	5	mixed-elected/appointed
Ghana	Parliament	200	4	simple plurality
Guinea	National Assembly	114	4	proportional representation-additional member system
Guinea-Bissau	National People's Assembly	100	4	proportional representation-limited vote
Kenya	National Assembly	224	5	mixed-elected/appointed
Lesotho	National Assembly	80	5	simple plurality
Liberia	House of Representatives	64	6	simple plurality
Madagascar	National Assembly	150	4	simple plurality
Malawi	National Assembly	192	5	proportional representation-single transferable vote
Mali	National Assembly	160	5	second ballot
Mauritania	National Assembly	79	5	second ballot
Mauritius	National Assembly	66	5	proportional representation-limited vote
Mozambique	Assembly of the Republic	250	5	proportional representation-party list
Namibia	National Assembly	78	5	mixed-elected/appointed
Niger	National Assembly	83	5	simple plurality
Nigeria	House of Representatives	360	4	simple plurality
Rwanda	Transitional National Assembly	70	transitional	appointed
São Tomé	National Assembly	55	4	proportional representation-party list
Senegal	National Assembly	140	5	proportional representation-additional member system
Seychelles	National Assembly	34	5	proportional representation-additional member system
Sierra Leone	House of Representatives	80	5	mixed-elected/appointed
Somalia	(suspended)	—	—	—
South Africa	National Assembly	400	5	proportional representation-party list

*continues*

Assemblies of the world (continued)

Table 29

Region/country	Name of lower house	Number of lower house members	Lower house term (years)	Lower house electoral system
Sudan	National Assembly	400	4	mixed-elected/indirect
Swaziland	House of Assembly	65	4	mixed-elected/appointed
Tanzania	National Assembly	275	5	mixed-elected/appointed
Togo	National Assembly	81	5	second ballot
Uganda	National Parliament	276	5	mixed-elected/indirect
Zambia	National Assembly	150	5	simple plurality
Zimbabwe	House of Assembly	150	6	mixed-elected/appointed
<b>Middle East &amp; North Africa</b>				
Algeria	National People's Assembly	380	5	proportional representation-party list
Bahrain	**	N/A	N/A	N/A
Egypt	People's Assembly	454	5	mixed-elected/appointed
Iran	Majlis ash-Shura	270	4	proportional representation-party list
Iraq	National Assembly (Majlis)	250	4	proportional representation-party list
Israel	Knesset	120	4	proportional representation-party list
Jordan	House of Representatives	80	4	simple plurality
Kuwait	National Assembly	50	4	simple plurality
Lebanon	National Assembly	128	6	proportional representation-party list
Libya	General People's Congress	1,112	1	indirect
Morocco	House of Representatives	325	5	proportional representation-party list
Oman	**	N/A	N/A	N/A
Qatar	**	N/A	N/A	N/A
Saudi Arabia	**	N/A	N/A	N/A
Syria	People's Assembly (Majlis)	250	4	simple plurality
Tunisia	National Assembly	163	5	proportional representation /additional member system
United Arab Emirates	**	N/A	N/A	N/A
Yemen	House of Representatives	301	4	simple plurality
<b>North America</b>				
Canada	House of Commons	301	5	simple plurality
United States	House of Representatives	435	2	simple plurality
<b>Northern &amp; Western Europe</b>				
Andorra	General Council	28	4	proportional representation-additional member system
Austria	Nationalrat	183	4	proportional representation-party list
Belgium	Chamber of Representatives	150	4	proportional representation-party list
Denmark	Folketing	179	4	proportional representation-party list
Finland	Eduskunta	200	4	proportional representation-party list
France	National Assembly	577	5	second ballot
Germany	Bundestag	669	4	proportional representation-additional member system
Iceland	Althing	63	4	proportional representation-party list
Ireland	Dáil	166	5	proportional representation-single transferable vote
Italy	Chamber of Deputies	630	5	proportional representation-additional member system
Liechtenstein	Landtag	25	4	proportional representation-limited vote

*continues*

Assemblies of the world (continued)

Table 29

Region/country	Name of lower house	Number of lower house members	Lower house term (years)	Lower house electoral system
Luxembourg	Chamber of Deputies	60	5	proportional representation-party list
Malta	House of Representatives	65	5	proportional representation-single transferable vote
Monaco	National Council	18	5	second ballot
Netherlands	Second Chamber	150	4	proportional representation-party list
Norway	Odelsting	124	4	proportional representation-party list
Portugal	Assembly	230	4	proportional representation-party list
San Marino	Council	60	5	proportional representation-limited vote
Spain	Congress of Deputies	350	4	proportional representation-party list
Sweden	Riksdag	349	3	proportional representation-party list
Switzerland	Nationalrat	200	4	proportional representation-party list
United Kingdom	House of Commons	659	5	simple plurality
Vatican City State	**	N/A	N/A	N/A
<b>Oceania</b>				
Australia	House of Representatives	148	3	alternative vote
Fiji Islands	House of Representatives	71	5	second ballot
Kiribati	Maneaba	41	4	second ballot
Marshall Islands	Nitijela	33	4	simple plurality
Micronesia	Congress of the FSM	14	4/2	simple plurality
Nauru	Parliament	18	3	simple plurality
New Zealand	House of Representatives	120	3	proportional representation-additional member system
Palau	House of Delegates	16	4	simple plurality
Papua New Guinea	Parliament	109	5	simple plurality
Philippines	House of Representatives	254	3	simple plurality
Samoa	Assembly	49	5	simple plurality
Solomon Islands	Parliament	50	4	simple plurality
Tonga	Legislative Assembly	30	3	mixed-elected/appointed
Tuvalu	Parliament	12	4	simple plurality
Vanuatu	Parliament	52	4	proportional representation-party list
<b>South America</b>				
Argentina	Chamber of Deputies	257	4	simple plurality
Bolivia	Chamber of Deputies	130	4	simple plurality
Brazil	Chamber of Deputies	513	4	proportional representation-party list
Chile	Chamber of Deputies	120	4	simple plurality
Colombia	House of Representatives	163	4	simple plurality
Ecuador	Chamber of Representatives	125	4	proportional representation-party list
Guyana	National Assembly	65	5	proportional representation-party list
Paraguay	Chamber of Deputies	80	5	proportional representation-party list
Peru	National Congress	120	5	proportional representation-party list
Suriname	National Assembly	51	5	simple plurality
Uruguay	Chamber of Deputies	99	5	proportional representation-party list
Venezuela	Chamber of Deputies	189	5	proportional representation-party list

(– = not applicable, N/A = not available.)

\*\*Appointed consultative councils exist.

been allowed to convene. Instead, its place has been taken by an appointed State Law and Order Restoration Council.

The contemporary scene, therefore, reveals little diminution in the number of assemblies. However, there has been a deterioration in their power and influence, particularly vis-à-vis the political executive. Undoubtedly, the major reason for this decline is the increase in party strength and discipline. Another important factor has been the increasing volume of government business. This has persuaded the executive, anxious to curtail the length of debate and analysis and prevent the tabling of numerous amendments, to impose 'guillotine' and 'block vote' motions in states such as France and the United Kingdom.

The political systems with parliamentary executives, drawn from and responsible to their assemblies, have, in many cases, seen the virtual disappearance of the independent politician and the rise of strong, highly disciplined, parties, demanding unfailing allegiance from their members and consistent support in the voting lobbies. The UK Parliament, and particularly the House of Commons, provides clear evidence of this trend, which in Britain has been reinforced by the simple plurality electoral system. This method of voting, almost presupposing the existence of a two-party regime, meant that the arrival of a significant third party in 1981 guaranteed parliamentary domination by whichever party gained 40% or more of the popular vote. In the UK elections of 1979, 1983, 1987, and 1992, for example, the Conservatives' share of the national vote was, respectively, 43.9%, 42.4%, 42.3%, and 41.9%. Similar trends have been noted in the case of the Australian House of Representatives. Here the alternative vote majoritarian system is in force.

In one-party states, assemblies have, traditionally, always been more subservient, providing a comforting democratic gloss of legitimacy to policy decisions taken behind the closed doors of party caucuses. In communist states, the sheer size of 'parliamentary' bodies such as the National People's Congress (c. 3,000 members) in China, and the fact that they meet in plenary session for, at most, only 10–14 days a year have been significant factors behind such impotence. The most important reason for their relative powerlessness, however, has been the rigid control over agenda and placements exerted by the party leadership above, buttressed by the principle of 'democratic centralism'. Similar tight leadership control is exerted in noncommunist, one-party states.

The political systems where assemblies still retain a degree of robustness are those with limited presidential executives, those where party structures are weak or absent, and the parliamentary executive states with voting systems which encourage a multiplicity of parties and 'consociational' politics.

In a limited presidential executive state, the constitution places clear restraints on the powers of the executive and protects the assembly in its counterbalancing role. This is evident in its purest and most extreme form in the United States, where it is enhanced by the notorious weakness of party structures, with more than half of the votes taken in Congress being bipartisan, in which a majority from both the two dominant parties vote together on an issue. It is also the case, though to lesser degrees, in Brazil, Colombia, Costa Rica, the Dominican Republic, the Philippines, and Venezuela. These are all countries where efforts have been made to copy the 'US model'.

In parliamentary states with electoral systems which stimulate party multiplicity, coalition executives are the norm and accountability to the assembly becomes a reality. Several Northern and Western European countries fall into this category, most notably Italy, which has had more than 50 governments since World War II. Others include Belgium, Denmark, and the Netherlands.

In the region we have called Oceania, the political system of Papua New Guinea, where more than six minor political parties effectively function, is an even more notable example of assembly atomization, with votes of no confidence being frequently registered against incumbent administrations, as members shift fluidly in and out of coalition groups. To redress this problem, the constitution has been recently amended to prevent no-confidence votes being held during the first 18 months of a government's life. In Micronesia, Nauru, Palau, and Tuvalu the absence of formal parties enhances the authority and bargaining power of individual legislators.

## 5.2 Legislative functions

Whatever degree of strength or weakness they display, what are the functions of contemporary legislative?

First, they have the obvious task of legitimizing policies, in other words turning political decisions into law. Although, at worst, this may mean little more than 'rubber stamping' the actions of the executive, it is a

basic function of an assembly and the foundation of what states which claim to be democratic call the 'rule of law'.

Second, they are required to act as the people's representatives and, as such, carry their views to the executives. This is what representative democracy is supposed to be about, but if it is to be effective then the assembly must be able to influence the executive. This brings us back to the question of an assembly's strength.

Third, they are expected to be a 'talking shop': the national debating arena. This is the role for which assemblies in liberal and emergent democracies are best equipped and which they generally best perform. In one-party states it is the party, through whatever closed institutions it devises, which predominantly fulfils this function. However, in one-party states which may be going through a transitional period, as is the case in several contemporary communist regimes, or are torn by internal factions, as, for example, in contemporary Iran, assembly debates can be surprisingly lively and relatively open.

Fourth, in liberal and emergent democracies, assemblies perform the vital 'reactive' role of supervising and scrutinizing the actions of the political executive and bureaucracy, calling attention to abuses of authority and inefficiencies, and suggesting improvements to legislative packages presented to them. This may be done by the regular questioning of government leaders and ministers by opposition deputies, as in the British 'Question Time' model, or by the work of standing and ad hoc scrutiny and investigative committees.

### 5.3 Comparing legislatures or assemblies

Table 29 provides a variety of data with which to compare assemblies in different states but if it is to be used effectively some criteria need to be established.

For example, is it important that some assemblies are unicameral, with one chamber, and others, bicameral, with two? Why, in two-chamber assemblies, are the 'upper' chambers usually less powerful than the 'lower'? Is it important that membership of some chambers is on the basis of election and others by appointment? Does the duration of the term of office of assembly members have any real significance?

Before these questions can be answered sensibly they must be qualified in some way.

The relationship between assemblies and political executives is arguably the most important basis of comparison because if democratic, rather than autocratic, government is to be achieved then there must be some limits on executive power and in most political systems the only representative body likely to be able to impose such limits is a popular assembly.

As the bases for objective comparisons, we will, therefore, look at single and two-chamber assemblies, and, where there are two, the relationships between them; the membership of assemblies and the criteria for membership; and the relationships between assemblies and executives.

### 5.4 One chamber or two?

First, the question of one or two chambers. There is a clear link between federalism and two-chamber assemblies. Of the 24 functioning federal states listed in Table 6 above, 19, or 79%, have two-chamber assemblies, compared with only 53 of the 168 unitary states, or just over 31%. In the majority of cases the reason for the link will be obvious and this is illustrated in Table 30. In this table the generic term 'second chamber' or 'upper house' has, for convenience, been used, but this can be slightly misleading. As we will see later, the so-called 'upper house' is often the weaker of the two and in the Netherlands what is listed in Table 30 as the 'second chamber' is in fact known as the 'first chamber' of the bicameral States-General.

It is interesting to observe that one state, Norway, ostensibly has a single-chamber assembly, the Storting, but, after the general election, this divides into two. A quarter of the 165-member Storting becomes an upper house, the Lagting, and the remaining three-quarters the lower house, the Odelsting. Legislation must start in the Odelsting and then be passed by the Lagting. If there is a conflict of view between the two Houses they can consider legislation jointly, as a combined Storting, and approve it by a two-thirds majority. A similar division operated in Iceland until 1991, when a unicameral parliament, the Althing, was established.

A regional pattern is also evident in the distribution of second chambers. They are most commonly found in the Americas, where, influenced by the US and, in the Caribbean, UK constitutional models, 21, or 60%, of the states in the region have bicameral legislatures. In Central, Eastern, Northern, Southern, and Western Europe two-chamber parliaments are also relatively

## Second chambers or upper houses

Table 30

Region/country	Federal (F) or unitary (U)	Name of upper chamber	Members	Relative term (years)	Relative powers to lower house	Basis of representation	Upper house electoral system
<b>Asia (9)</b>							
Cambodia	U	Senate	61	–/5	<	national	appointed
India	F	Council of States	245	6/5	<	regional	indirect
Japan	U	House of Councillors	252	6/4	<	national & local	direct- proportional representation/ limited vote
Kazakhstan	U	Senate	47	4/4	–	regional	mixed-elected/ appointed
Kyrgyzstan	U	People's Assembly	67	5/5	<	national	direct-second ballot
Malaysia	F	Senate	70	6/5	<	mixed	mixed- elected/appointed
Nepal	U	National Council	60	6/5	<	national & local	mixed- indirect/appointed
Pakistan	F	Senate	87	6/5	<	regional	indirect
Thailand	U	Senate	200	6/4	=	national	direct-simple plurality
<b>Central America &amp; Caribbean (11)</b>							
Antigua	U	Senate	17	5/5	<	national	appointed
Bahamas	U	Senate	16	5/5	<	national	appointed
Barbados	U	Senate	21	5/5	<	national	appointed
Belize	U	Senate	8	5/5	<	national	appointed
Dominican Republic	U	Senate	30	4/4	=	regional	direct-second ballot
Grenada	U	Senate	13	5/5	<	national	appointed
Haiti	U	Senate	27	5/5	<	national	direct-second ballot
Jamaica	U	Senate	21	5/5	<	national	appointed
Mexico	F	Senate	64	6/3	=	regional	direct-additional member system
St Lucia	U	Senate	11	5/5	<	national	appointed
Trinidad and Tobago	U	Senate	31	5/5	<	national	appointed
<b>Central, Eastern, &amp; Southern Europe (9)</b>							
Belarus	U	Council of the Republic	64	4/4	>	regional	mixed-indirect/ appointed
Bosnia-Herzegovina	F	House of Peoples	15	trans- sitional	<	regional	indirect
Croatia	U	Chamber of Counties	68	4/4	<	regional & local	mixed-elected/ appointed
Czech Republic	U	Senate	81	6/4	<	national	direct-second ballot
Poland	U	Senate	100	4/4	<	regional	direct-proportional representation
Romania	U	Senate	143	4/4	<	national	direct-proportional representation
Russia	F	Federation Council	178	4/4	<	regional	indirect

*continues*

## Second chambers or upper houses (continued)

Table 30

Region/country	Federal (F) or unitary (U)	Name of upper chamber	Members	Relative term (years)	Relative powers to lower house	Basis of representation	Upper house electoral system
Slovenia	U	National Council	40	5/4	<	national	mixed-elected/ indirect
Yugoslavia	F	Chamber of the Republics	40	4/4	=	regional	indirect
<b>Central &amp; Southern Africa (15)</b>							
Botswana	U	House of Chiefs	15	- /5	<	regional	mixed- indirect/appointed
Burkina Faso	U	Chamber of Representatives	178	3/5	<	national	appointed
Central African Republic	U	Economic & Regional Council	–	5/5	<	regional	mixed-indirect/ appointed
Ethiopia	F	Council of the Federation	117	5/5	<	regional	indirect
Gabon	U	Senate	91	6/5	<	local	indirect
Lesotho	U	Senate	33	-/5	<	national	hereditary/ appointed
Liberia	U	Senate	26	9/6	=	national	direct-simple plurality
Madagascar	U	Senate	–	4/4	<	national	mixed-indirect/ and local appointed
Mauritania	U	Senate	56	6/5	<	local	indirect
Namibia	U	National Council	26	6/5	<	local	indirect
Nigeria	F	Senate	109	4/4	>	regional	direct-simple plurality
Senegal	U	Senate	60	varies/5	<	mixed	indirect/appointed
South Africa	U	Senate	90	5/5	<	regional	indirect
Swaziland	U	Senate	30	4/4	=	mixed	mixed-elected/ indirect
Zambia	U	House of Chiefs	27	-/5	<	regional	appointed
<b>Middle East &amp; North Africa (3)</b>							
Algeria	U	Council of the Nation	144	6/5	<	regional	mixed- indirect/appointed
Jordan	U	Senate	40	8/4	=	national	appointed
Morocco	U	Chamber of Councillors	270	9/6	<	regional	indirect
<b>North America (2)</b>							
Canada	F	Senate	104	life*/5	<	regional	appointed
United States	F	Senate	100	6/2	>	regional	direct-simple plurality
<b>Northern &amp; Western Europe (11)</b>							
Austria	F	Bundesrat	64	varies/4	<	regional	indirect
Belgium	F	Senate	71	4/4	=	mixed	mixed-elected/ appointed
France	U	Senate	321	9/5	<	mixed	indirect
Germany	F	Bundesrat	69	**/4	<	regional	indirect

*continues*



## Second chambers or upper houses (continued)

Table 30

Region/country	Federal (F) or unitary (U)	Name of upper chamber	Members	Relative term (years)	Relative powers to lower house	Basis of representation	Upper house electoral system
Ireland	U	Seanad	60	5/5	<	national	mixed-elected/ appointed
Italy	U	Senate	315	5/5	=	regional	indirect
Netherlands	U	First Chamber	75	6/4	<	regional	indirect
Norway	U	Lagting	41	4/4	=	national	indirect
Spain	U	Senate	252	4/4	<	mixed	mixed-elected/ indirect
Switzerland	F	Standerat	46	4/4	=	local	indirect
United Kingdom	U	House of Lords	1,220	life/5	<	national	hereditary/ appointed
<b>Oceania (4)</b>							
Australia	F	Senate	76	6/3	<	regional	direct-proportional representation/ single transferable vote
Fiji	U	Senate	34	5/5	<	mixed	mixed-indirect/ appointed
Palau	U	Senate	14	4/4	=	regional	direct-simple plurality
Philippines	U	Senate	24	6/3	>	national	direct-simple plurality
<b>South America (8)</b>							
Argentina	F	Senate	72	6/4	<	regional	indirect
Bolivia	U	Senate	27	4/4	=	regional	direct-simple plurality
Brazil	F	Senate	81	8/4	=	regional	direct-simple plurality
Chile	U	Senate	47	8/4	=	regional	mixed-elected/ appointed
Colombia	U	Senate	102	4/4	=	national	direct-simple plurality
Paraguay	U	Senate	45	5/5	<	regional	direct-proportional representation
Uruguay	U	Senate	31	5/5	=	national	direct-proportional representation
Venezuela	F	Senate	49	5/5	=	regional	mixed-elected/ appointed

(– = not applicable, > = more power in the upper house, < = less power in the upper house.)

\* Retire at age 75.

\*\* Depends on terms of state governments.

common, featuring in 20, or 42%, of the region's states. In contrast, although 16 states established a second chamber during the last decade, they are rare in Africa and the Middle East, being found in only 16, or 24%, of the states. In Asia 32% of states have bicameral legislatures and in Oceania 27%.

Overall, the number of countries with bicameral parliaments has advanced from 50 to 72 since the first edition of this title appeared in 1990. Three states, Afghanistan, Peru, and Zimbabwe, have reverted to unicameral structures, while 25 countries have moved in the other direction, establishing a second chamber.

These are Algeria, Belarus, Bosnia-Herzegovina, Botswana, Burkina Faso, Cambodia, the Central African Republic, Croatia, Ethiopia, Gabon, Haiti, Kazakhstan, Kyrgyzstan, Lesotho, Madagascar, Mauritania, Morocco, Namibia, Nepal, Nigeria, Romania, Senegal, Slovenia, South Africa, and Zambia. It was also planned to establish a second chamber in Malawi and Tajikistan, in 1999.

In making an initial comparison between countries with one- or two-chamber assemblies, Table 30 is relevant, indicating whether the state is unitary or federal, whether members are elected or appointed on a national or regional basis, and whether or not a representative or appointee is required to reside in the constituency he or she represents.

Of the 19 federal states with bicameral assemblies, 17, or 89%, have second chambers which are representative in a regionally or locally biased manner, whereas only 19 out of 53, or 36%, unitary states have similar regionally or locally representative bases. Twenty-six unitary states, or 49%, have national representative bases. There are ten states where the representation is part-national and part-regional and two federal and eight unitary states fall into this category.

This pattern illustrates one of the chief reasons for having a second chamber: to help resolve regional differences in countries which are geographically large and/or socially and culturally diverse. Regional interests, which might object to a centralized government and dominance by large state or metropolitan interests, are to some extent pacified by the knowledge that they are formally represented at the center by a 'local' politician. Indeed, in a number of countries, such as Australia, Germany, Nigeria, and the United States, a feature of the second chamber is the way in which smaller states within the federal system are deliberately over-represented to reduce the threat of 'tyranny by the majority'. In the United States for example, where each state, regardless of size or population, has two senators, theoretically a coalition of senators from the Union's 26 smallest states, comprising less than a sixth of the country's population, could secure a majority to block legislation. Similarly in Australia, New South Wales, with a population of 6 million, sends the same number of senators, 12, to the senate as tiny Tasmania, with a population of less than half a million.

Incidentally, it is interesting to note that, whereas the majority of countries recognize regional aspirations through second chamber representation, Uruguay seeks to achieve this in a reverse way, by having national

representation in the second chamber and regional representation in the first.

A minority of constitutions carry this regional representation a stage further by requiring politicians to reside in the region they represent. Argentina, Canada, and the United States have adopted this rule.

The relationship between first and second chambers in terms of political power and authority is another interesting basis of comparison. It is not easy to make clear distinctions and, inevitably, a certain amount of subjectivity will creep in. Table 30 attempts this comparison, using criteria such as the ability to veto legislation, the respective controls of financial legislation, and the extent to which a chamber has powers to interrogate the executive and curb its powers. On the basis of such criteria, it will be seen, in Table 30, that the majority of second chambers are weaker, or enjoy parity, with first chambers, and only four, the United States, Nigeria, and Philippines' Senates, and Belarus's Council of the Republic, it can be argued, are stronger.

Typically, lower houses have primacy in finance matters, while upper chambers have only limited delaying powers. This is certainly the case in the United Kingdom, where the House of Lords has the authority to amend legislation and delay nonfinancial bills by one year, but may not examine, let alone reject, financial bills or, as accepted by the 'Salisbury doctrine', (a convention associated with the Marquess of Salisbury), measures which appeared in a successful party's election manifesto. In Austria, the Netherlands, Spain, and Thailand all bills must commence their passage in the lower house. In Poland, the Senate has the power of veto in specified areas, but this can be overridden by a two-thirds vote in the lower chamber, the Sejm. In Germany, all legislation relating to *Länder* (states) responsibilities require the approval of the Bundesrat upper house and constitutional amendments require two-thirds majorities in both chambers. On other matters, the Bundesrat may suggest amendments to legislation approved by the Bundestag, the lower chamber, send disputed items to a joint Bundestag-Bundesrat 'conciliation committee', and can block items of which it disapproves, but only temporarily, until a counter-vailing 50% or 66% Bundestag vote is passed. In other states, such as France, India, and Malaysia, where the Senate's delaying powers are restricted to just one month for money bills and one year for other bills, there are similar constitutional provisions to ensure primacy for the lower chamber.

This imbalance in influence is understandable. It is

attributable to the greater popular legitimacy that is enjoyed by lower chambers, which are usually directly elected, and for comparatively short terms, whereas many upper chambers are either elected indirectly or are appointed. In addition, in parliamentary regimes, it is in the lower chamber that the executive, the prime minister and cabinet, sit, and from which they are predominantly drawn.

The exceptions to this are, significantly, to be found in limited presidential states. In the United States, the lower chamber, the biennially elected House of Representatives, also has primacy in financial matters; all revenue raising and general appropriation bills originate there. However, the upper-chamber Senate, whose members serve six-year terms, has effective veto power over lower-house measures and has additional competence in three areas. Its approval is required for key federal judicial, diplomatic, and presidential cabinet appointments; it ratifies foreign treaties; and it acts as the jury when a president is impeached. For these reasons, it can be viewed as the most powerful chamber of Congress. In the Philippines, as in the United States, the approval of both chambers is required for the passage of legislation, with special joint 'conference sessions' being convened to iron out differences when they arise. Similarly, the Senate has special authority over foreign affairs, two-thirds approval from it being required for the ratification of all treaties and agreements.

## 5.5 Membership and designation of legislatures

Table 29 above shows that, in the vast majority of states, assembly membership is on the basis of election. It would be surprising if it were otherwise since the main purpose of having an assembly is to ensure, or at least suggest, that the ordinary person has an opportunity to be represented by a politician who has been freely chosen. How this is done and whether or not it is done successfully will be examined in the next chapter.

There are a few first chambers or single chambers where a combination of election and appointment is used. In the vast majority of such cases the nonelected members are executive appointees, giving a president or monarch the opportunity of placing his or her own people. Occasionally appointments are made to try to ensure a particular distribution of membership. In Tanzania, for example, a complicated mixture of election and appointment makes provision for regional,

female, and party representation as well as presidential nominees. Similarly, in Bangladesh a set quota of National Assembly seats, 30, are reserved for women appointees. In Pakistan, ten National Assembly seats are reserved for Christians, Hindus, Parsis, and other minorities. In India, two Lok Sabha seats are allocated for the Anglo-Indian community and in Romania 15 Chamber of Deputies' seats are set aside for representatives of national minorities. In Singapore the Group Representation Constituency (GRC) rules ensure that at least 15 members of Parliament are of non-Chinese racial origin and in Zimbabwe, ten House of Assembly seats are filled by traditional chiefs. In Venezuela, former state presidents automatically become life members of the Senate.

In the majority of one-party states assembly representatives, whether elected or appointed, are initially selected by the party. In communist systems there is an interweaving of party and state membership, with the party nominees, because of their greater experience and 'professionalism', dominating proceedings. The non-party deputies are selected as exemplary representatives of the full cross section of society by sex, age, ethnic, and occupational groups. They serve their constituents as mandated delegates on a part-time basis, being given only minor 'out-of-pocket' expenses for the five to ten days spent each year at the national assembly.

Of the 72 states with second chambers, members are directly elected in 20, indirectly elected in 19, wholly appointed or placed by hereditary right in 15, and part-elected and part-appointed in 18. Appointed or hereditary second chambers are typically found in countries in the Caribbean and Commonwealth, influenced by the model of the British House of Lords, although in Canada there is compulsory retirement at the age of 75. In some of the small states, with a parliamentary executive fashioned on the British 'Westminster model' (see 4.2), the mixture of election and appointment is constructed so as to reflect the political balance in the first chamber. In Antigua, the Bahamas, Barbados, Belize, Grenada, St Lucia, and Trinidad and Tobago, for example, the prime minister and the official leader of the opposition are entitled to nominate members.

In states with political systems modelled on the United States, most notably those in Latin America, but also the new states of Central and Eastern Europe, direct popular election of the second chamber predominates.

In Northern and Western Europe and South Asia, by contrast, members of second chambers are predomi-

nantly elected indirectly, in the majority of cases by regional assemblies. Austria, Belgium, France, Germany, India, Ireland, the Netherlands, Pakistan, and Yugoslavia all provide examples of indirectly elected second chambers. In Germany, the composition of the upper chamber, the Bundesrat, is unusual in that its members are not only appointed by the members of the 16 *Länder* (states), but are themselves members of their own state governments, delegations being made or renewed after each state election. As a consequence, state governments are able to participate directly in the federal parliamentary process. In India the Rajya Sabha is elected by members of state legislative assemblies, using the single transferable vote. In Malaysia a two-term limit is applied to upper-house deputies.

In several African, Central American, and Asian states there are specific literacy requirements for candidates for legislatures. This is the case in Botswana, Cameroon, Costa Rica, Gambia, Kenya, Malawi, the Philippines, and Singapore. The most popular term of membership for first or single chambers is five years, closely followed by four years. The shorter term is found most commonly in Europe and Oceania, where liberal and emergent democratic regimes predominate, while five-year terms are common in Africa and Central America and the Caribbean. The complete analysis is given in Table 31.

The popularity of a five-year term is understandable. A newly elected government, with a policy package it wished to implement, would probably spend at least the first two years framing the necessary legislation and ensuring its passage through the legislative machine. If a proposal was thought to be beneficial in the long term, but unpopular in a short time span, then a reasonable period would be needed for the public to appreciate its benefits. That would be the government's view. On the other hand, immediately popular proposals might be innately flawed and these defects might only reveal themselves over time. A five-year term of office would give the electorate time to assess a government's performance before it submitted itself again for election. That would be the opposition's view.

Politicians in states with lower chambers with short terms of two or three years, such as the United States, Australia, New Zealand, and Sweden, have expressed reservations from time to time about the shortness of the term and some of the practical consequences. Short-term assemblies tend to make governments cautious in their policy proposals, fearing a loss of public support with insufficient time to prove that short-term

**Assembly: terms of membership Table 31**

Term (years)	First or single chamber		Second chamber	
	number in world	% of world	number in world	% of world
1	1	1	0	0
2	2	1	0	0
3	10	5	1	1
4	74	40	18	25
5	86	46	20	28
6	4	2	17	24
7	0	0	0	0
8	0	0	3	4
9	0	0	3	4
life	0	0	2*	3
varies	0	0	4	6
transitional/ suspended	8	5	4	6
<b>Total</b>	185	100	72	100

\* With a retirement age of 75 in Canada.

unpopularity can be replaced by long-term satisfaction.

It should be remembered, however, that assemblies in states with parliamentary executives rarely run their full terms. They may end because the government loses assembly support or, as frequently happens, it, or a coalition partner, seeks a dissolution at what it considers to be the most propitious time to ensure electoral success.

In states with limited presidential executives, assembly terms are, invariably, of a fixed duration. This is of potential value to opposition parties, removing the incumbent administration's control over the election timetable and thus subjecting all members equally to the whims of random external forces. It also serves, however, to institutionalize electioneering, sometimes to an unhealthy degree. This is most clearly seen in the case of the US House of Representatives, whose members, facing biennial elections, find themselves condemned to a nonstop cycle of campaigning and fundraising. Fixed-term assemblies are also the norm in two Scandinavian countries with parliamentary executives, Norway and Sweden, and also in Switzerland. In Germany, the term is not formally fixed, but early dissolution for opportunistic reasons is resisted by the Federal Constitutional Court.

As Table 31 shows, the terms of second chambers are invariably longer than those of lower houses, and are only shorter in one country, Burkina Faso. The most common term for the upper house is, again, five years,

but in 17 states it is six years and in six states it is either eight or nine years.

Second chambers with terms of six years or more often stagger those of individual members, with half or a third submitting themselves for election at a time. This serves to 'keep fresh' the accountability of the assembly, but can create problems for a new administration assuming office following a sudden election swing in the lower chamber. The states falling into this staggered category are:

Nine-year term with a third retiring every three years: Argentina, France, and Morocco;

Eight-year term with a third and two-thirds retiring alternately every four years: Brazil;

Eight-year term with half retiring every four years: Jordan;

Six-year term with half retiring every three years: Algeria, Japan, the Netherlands, and the Philippines;

Six-year term with a third retiring every two years: United States, India, and Pakistan;

Four-year term with half retiring every two years: Kazakhstan.

Additionally, constitutions invariably specify qualifications for candidates in assembly elections, including a minimum age. Most states with two-chamber assemblies stipulate a more mature entry age for members of the upper chamber. In Romania and Venezuela, for example, the minimum ages are 21 years for the Chamber of Deputies and 30 years for the Senate. In Argentina, India,

Japan, Pakistan, the United States, and Uruguay, they are 25 years for the lower house and 30 years for the upper chamber. In the Philippines and Thailand, the figures are 25 years for the House of Representatives and 35 years for the Senate. In Brazil, the ages are 21 for the Chamber of Deputies and 35 for the Senate; in France, 23 years for the National Assembly and 35 years for the Senate; and in Italy, 25 years for the Camera dei Deputati and 40 years for the Senato.

This requirement of greater maturity, frequently combined with a longer term of office than in the first chamber, tends to add to the authority of second chamber members, who have often already had sufficiently long political careers to qualify them for the description of 'elder statesmen'.

Finally, influenced by the US model, by far the most popular name adopted for the upper chamber has been the Senate. It is used in 48, or 67%, of the states with second chambers. For lower chambers, there is a wider variety of nomenclature. The most popular designation is National Assembly, used in 55, or 30%, of states with lower chambers. A further 31 states have lower houses described variously as the People's Assembly, House of Assembly, Legislative Assembly, Majlis, or, simply, the Assembly. In 30 states, including the United States, the lower chamber is called the House (or Chamber) of Representatives; in 17 states, including ten in Central and South America, the Chamber of Deputies; and in 13 states, many of which are in the Commonwealth, the name which has been adopted is Parliament. It should

Size distribution of contemporary world assemblies

Table 32

Membership	Lower chambers	Upper chambers	Lower chambers (%)	Upper chambers (%)
10 or below	0	1	0	1
11–50	31	30	17	42
51–100	43	23	23	32
101–200	53	9	29	12
201–300	20	4	11	6
301–400	13	2	7	3
401–500	10	0	5	0
501–750	10	0	5	0
751–1,000	0	0	0	0
1,001–3,000	2	1	1	1
N/A	3	2	2	3
<i>Total</i>	<i>185</i>	<i>72</i>	<i>100</i>	<i>100</i>

Population per lower house member (c. 1995)

Table 33

Country	Region	Population (thousands) per lower house member	Country	Region	Population (thousands) per lower house member
<b>Over 200,000 (14 states)</b>			Burkina Faso	C & S Africa	89.1
India	Asia	1,685.4	United Kingdom	N & W Europe	88.9
United States	N America	609.9	Ghana	C & S Africa	87.2
Pakistan	Asia	583.5	Cambodia	Asia	86.9
China	Asia	407.9	Bosnia-Herzegovina	C, E, & S Europe	85.7
Indonesia	Asia	384.4	Haiti	C America & Caribbean	84.8
Bangladesh	Asia	364.8	Uzbekistan	Asia	84.8
Russia	C, E, & S Europe	328.8	Poland	C, E, & S Europe	84.0
Nigeria	C & S Africa	301.3	Morocco	Middle East & N Africa	81.8
Brazil	S America	299.7	Iraq	Middle East & N Africa	79.7
Philippines	Oceania	263.9	Sri Lanka	Asia	79.6
Kazakhstan	Asia	254.1	Côte d'Ivoire	C & S Africa	78.3
Japan	Asia	249.9	Yugoslavia	C, E, & S Europe	76.2
Iran	Middle East & N Africa	219.5	Turkmenistan	Asia	76.2
Colombia	S America	211.8	Burundi	C & S Africa	75.7
<b>Between 100,000 and 200,000 (26 states)</b>			Uganda	C & S Africa	74.7
Peru	S America	192.4	Zimbabwe	C & S Africa	74.3
Mexico	C America & Caribbean	186.0	Sudan	C & S Africa	72.4
Vietnam	Asia	161.1	Algeria	Middle East & N Africa	71.9
Thailand	Asia	151.8	Cameroon	C & S Africa	71.5
Korea, South	Asia	149.2	Belgium	N & W Europe	67.2
Argentina	S America	133.0	El Salvador	C America & Caribbean	67.2
Kenya	C & S Africa	130.8	Romania	C, E, & S Europe	66.2
Egypt	Middle East & N Africa	129.9	Mozambique	C & S Africa	66.0
Guatemala	C America & Caribbean	129.0	Jordan	Middle East & N Africa	65.0
Australia	Oceania	124.5	Benin	C & S Africa	64.9
Germany	N & W Europe	121.7	Zambia	C & S Africa	61.3
Kyrgyzstan	Asia	121.1	Azerbaijan	C, E, & S Europe	60.4
Chile	S America	116.6	Paraguay	S America	58.8
Ukraine	C, E, & S Europe	115.8	Senegal	C & S Africa	57.9
Spain	N & W Europe	112.8	Guinea	C & S Africa	57.0
Venezuela	S America	112.0	Bolivia	S America	55.7
Turkey	C, E, & S Europe	111.2	Syria	Middle East & N Africa	55.4
Rwanda	C & S Africa	110.7	Sierra Leone	C & S Africa	55.0
Niger	C & S Africa	106.6	Costa Rica	C America & Caribbean	53.9
Tanzania	C & S Africa	104.9	Tunisia	Middle East & N Africa	53.6
Malaysia	Asia	104.7	Malawi	C & S Africa	53.5
Nepal	Asia	104.2	Yemen	Middle East & N Africa	52.5
Netherlands	N & W Europe	103.3	Dominican Republic	C America & Caribbean	52.1
South Africa	C & S Africa	101.1	Czech Republic	C, E, & S Europe	51.7
Ethiopia	C & S Africa	100.3			
France	N & W Europe	100.1			
<b>Between 50,000 and 100,000 (47 states)</b>			<b>Between 10,000 and 50,000 (59 states)</b>		
Canada	N America	97.2	Chad	C & S Africa	49.7
Madagascar	C & S Africa	95.4	Togo	C & S Africa	48.5
Taiwan	Asia	95.3	Angola	C & S Africa	48.5
Myanmar	Asia	93.9	Malawi	C & S Africa	49.3
Belarus	C, E, & S Europe	93.3	Nicaragua	C America & Caribbean	47.3
Italy	N & W Europe	90.8	Laos	Asia	46.5
Ecuador	S America	89.9	Honduras	C America & Caribbean	45.1

*continues*



## 5.6 Legislature size

In Table 32 the size distribution of contemporary world assemblies, lower and upper chambers, is set out and in Table 33 the general population per lower-house member has been calculated for each state with an assembly.

From Table 32 it emerges that 69% of the world's lower chambers have memberships of 200 or less, with the median size being around 140. In addition, it is apparent that upper houses of bicameral legislatures are almost uniformly smaller than their lower-house counterparts, being, on average, half the size. As a consequence, 75% of upper chambers have memberships of 100 or less, the median figure being around 60.

From Table 33 it emerges, not surprisingly, that a state's population size is the principal determinant both of the membership size of its assembly and of the resultant member:population ratio. Thus, the larger, in demographic terms, the state, the larger, on average, the size of its assembly and, notwithstanding this, the higher its member:population ratio. For this reason, India, the second most populous country in the world, appears at the bottom of the Table 33 ratio listings, with each of its deputies representing 1.7 million people, followed by the United States, the world's fourth most populous state. Conversely, tiny, usually island, states, such as Nauru, Tuvalu, Belau, the Marshall Islands, and Kiribati, are to be found clustering at the head of the listings, having small assemblies, with memberships substantially fewer than 50, yet, despite this, still registering unusually low member:population ratios, with each deputy representing fewer than 2,000 people. In contrast, in the economically developed and densely peopled states of Northern and Western Europe assembly members typically represent between 20,000 and 120,000 people.

There are two notable exceptions to this general, regular pattern.

First, communist or nationalistic socialist states usually have assemblies far larger than equivalent sized liberal or emergent democracies, or one-party, nonsocialist states. As a natural corollary, their resulting member:population ratios are lower than might be expected. China, with its 2,979-member National People's Congress; Libya, with its 1,112-member General People's Congress; and North Korea, with its 687-member Supreme People's Assembly are the most prominent examples. The rationale behind the election of these 'jumbo-assemblies' would, in theory, appear to be a desire to broaden the participation base. In prac-

tice, however, as has been noted earlier, these assemblies meet in plenary session for less than two weeks a year. They delegate their authority to smaller standing committees and general secretariats, which variously comprise between 40 to 160 members, a figure substantially below the membership average for the permanent assemblies in liberal or emergent democracies.

In two other countries, Indonesia and Taiwan, large quasi-legislatures are found, with respective memberships of 700 and 334, and with powers to amend their constitutions and (in Taiwan until 1996) to appoint the state presidents. These are, however, only ad hoc bodies, meeting at five- and six-year intervals, unless specially summoned. In the interim periods, they delegate effective authority to smaller, regular, national assemblies below them. For this reason, they have not been treated as full assemblies in this chapter, being excluded from the listings in Table 29 and from the calculations made for Table 33. A smaller supervisory 'super legislature', twice the size of the regular 50-member legislature, also exists in Turkmenistan, being convened to debate important political and economic issues.

The second, and more specific, anomaly which emerges when Tables 32 and 33 are studied, in conjunction with Tables 29 and 30, is found in the United Kingdom. The United Kingdom has, after Germany, the second largest lower house, with 659 members, of all the world's liberal democracies and, for this reason, has a comparatively low member:population ratio for its total population size. Furthermore, it is the only country in the world having an upper chamber with a larger membership than its lower. This results from the anachronistic combination of hereditary succession and government appointment that is still used to fill the House of Lords, as well as the fact that in earlier years it was the pre-eminent chamber. Today, the House of Lords comprises roughly 750 hereditary peers and 470 life peers, including the law lords and the 'lords spiritual', and 1,038 members have voting rights. However, in practice its active membership is less than 400. Indeed, 300 hereditary peers have never even visited the chamber to take the oath of membership.

## 5.7 Legislative-executive relationships

There are three possible bases on which to examine the assembly-executive relationship. First, the extent to which an assembly can initiate legislation. Second, the



extent to which an assembly can influence policy-making. Third, the extent of an assembly's ability to criticize the executive, block its policies, and even dismiss it.

The vast majority of contemporary assemblies are not significant initiators of legislation. They are, as has already been said, mainly amenders and approvers. For this reason they have frequently been categorized as 'reactive' chambers. There are, however, some notable exceptions which stand out as examples of 'active' legislatures. Nonadversarial Sweden, where assembly members are mainly grouped in constituency, rather than party, blocks, is one. So, to an even greater extent, is the United States.

In Sweden private members' proposals (*motioner*) are ten times as numerous in the Riksdag as government bills (*propositioner*), although the bulk of the former are amendments or party alternatives to government bills, designed to spark off new discussion and inquiries.

In the US Congress thousands of bills and resolutions are introduced each year by senators and representatives, several hundred of which ultimately become law. Even here, however, the key legislative measures are those proposed in January by the president in his annual 'State of the Union' address to both chambers and which are subsequently adopted by party supporters within Congress under the promptings of the White House liaison staff.

The ability of assemblies to influence policy-making is also slight, Sweden, again, being somewhat unusual in this respect. An assembly in a state with a parliamentary executive is, in theory, in a strong position to make policy since the executive is drawn from it and responsible to it. In practice, however, an assembly member who has joined the executive to a great extent loses his or her allegiance to the assembly and becomes, psychologically but not physically, separate from it. The obvious example is the distinction between a front-bench (government), member of the UK House of Commons and a back-bencher (a member of parliament who is not a member of the government).

So we are left with the third base on which to examine the legislative-executive relationship: the ability to criticize, block policies and, *in extremis*, to dismiss an executive.

Most assemblies in parliamentary executive systems have built-in mechanisms for regular questioning of ministers. The UK House of Commons has an hour set aside for this four days a week, and each Wednesday afternoon, 30 minutes are set aside for questions specif-

ically addressed to the prime minister. Although probably the most popular event of the parliamentary week in Britain, as far as the media and public are concerned, there is little evidence that Question Time in the House of Commons is anything more than an opportunity for rival parties to score points against each other. In Germany and Finland 'interpellation', or questioning, seems more successful, the oral questioning of a minister often being accompanied by a snap vote.

Most assemblies in limited presidential and parliamentary executive systems have strong committee structures, partly to expedite the legislative process and partly to oversee the actions of the executive. The US Congress undoubtedly has the strongest committees of any contemporary assembly in the world. The power and authority of these committees, well provisioned with research staff and armed with extensive rights to subpoena staff from the executive, have been dramatically highlighted in recent years through the wide publicity given to the Watergate, Irangate, Whitewater, and Monicagate hearings. The fact that sessions of the congressional committees can receive nationwide television coverage has increased public awareness and enhanced their influence.

By comparison, assembly committees in other states seem weak. In the United Kingdom, as the result of the composition of the House of Commons and the disciplined party system, standing committees which consider government legislation are government-dominated, introducing only minor amendments to bills presented. Even weaker are the investigative select committees which were introduced into the chamber in 1979 to 'shadow' the work of government departments. Although producing informative reports, with the exception of the longer established Public Accounts Committee, their impact as parliamentary watchdogs has not been great. Their counterparts in Canada and France have been only marginally more successful.

Stronger committee systems operate in Germany, Italy, and Japan, all three having constitutions partly modelled on that of the United States. These committees are primarily concerned with legislation but, from time to time, ad hoc investigative committees have been influential. In Japan, in 1976, an assembly committee vigorously investigated the Lockheed bribes scandal, its work eventually resulting in the arrest and trial of the former prime minister, Tanaka. More recently in Germany, where the Bundestag is obliged to set up an investigation committee upon the motion of one-quarter of its members, a committee successfully probed the

'Flick scandal', which was concerned with illegal party financing.

In one-party states, assemblies are inevitably subservient to the party, and hence the executive, although functional 'Specialized Committees' operate in such bodies as China's National People's Congress to discuss and draft bills and resolutions.

In states with parliamentary executives, the ultimate sanction of assembly members is to dismiss the executive, the prime minister and government, through voting against it in a no-confidence motion. This has occurred frequently in postwar Italy and, as noted above, in Papua New Guinea. In other parliamentary states the government's defeat is difficult to achieve as a result of special constitutional rules. Thus in Germany, as noted in Chapter 4, there is the requirement for a 'constructive vote of no-confidence', in which deputies vote for an agreed successor. In France a 'no-confidence' vote can only be carried against the government if it attracts the support of more than half of the National Assembly's total membership and not just a majority of those voting. If such a motion fails, Assembly members are barred from calling another such motion during the same parliamentary session. In limited presidential executives, the ability to remove the executive is even more restricted, being limited to the protracted process of impeachment or, as in the cases of Venezuela in 1993, Brazil in 1992, and the United States in 1974, the threat of impeachment. However, in September 1996 President Zafy of Madagascar was removed by the impeachment process and, in the United States, impeachment proceedings were initiated against President Clinton in 1998. He was impeached by the House but was tried and acquitted by the Senate in 1999.

Thus, on balance, it must be said that, with some rare exceptions, contemporary assemblies have shown little sign of keeping up with, let alone overtaking, the increasing power and authority of executives of all types.

## 5.8 The representation of interests

The representation of interests is one activity that assemblies usually do well, especially in liberal democratic and emergent democratic states. This representation falls into three broad categories: constituency representation, party representation, and specific group representation.

Constituency representation is a traditional function of all assemblies. In the US Congress it has been devel-

oped to a high degree and is reinforced by the residential factor in both the House of Representatives and the Senate. Some members of Congress have devoted virtually their entire political careers to the economic advancement of the constituencies they represent, knowing that this is the surest route to re-election. As a consequence, until the November 1994 'anti-incumbent' Congressional elections, 'return rates' were as high as 90% for representatives and 75% for senators. This has led to calls for the imposition of 'term limits' on congress members, as are imposed in several US state legislatures. In the Philippines, they are set at two consecutive terms for Senators and three for members of the House of Representatives.

Similar, but less well-developed, examples of strong constituency representation can be found in assemblies in other parts of the world, including Kenya, the Philippines, South Korea, France, and the United Kingdom. In the British House of Commons, for example, it is not unknown for a member to ignore a major policy line of his or her party in order to support his or her constituency. Some UK Labor Party Members of Parliament have in recent years been confronted with 'dilemmas of conscience' in trying to follow a non-nuclear power policy when their constituents have been dependent on nuclear generation for their livelihoods.

Party representation has been the fastest growing activity in most assemblies in recent years. Until the election of the anti-corruption candidate, Martin Bell, in June 1997, there had been no independent MPs in the UK House of Commons since the 1960s, and there is now only a minority of assemblies that accommodate them. The Maldives, the Marshall Islands, Micronesia, Monaco, Nauru, Palau, and Tuvalu seem to be the few contemporary states where assembly elections are contested exclusively by politicians standing as independents. However, in some of the recently liberated and democratizing states of the former Soviet Union, for example Kyrgyzstan, Ukraine, and Uzbekistan, where party structures are currently weak, the majority of candidates and deputies are independents, as is also the case in Swaziland.

The representation of group interests is another growing activity of assembly members, particularly in liberal democratic countries. In the UK House of Commons many Labor members are sponsored by trade unions and some Conservatives are paid by a variety of interests to present their points of view. In an effort to bring this activity into the open, the House of Commons has produced a Register of MPs' Interests

and members are requested to register their interests as well as declare them during the course of debates. The recommendations of the Nolan Committee in 1995 led to a further tightening of these rules. In the United States, with the growing influence of Political Action Committees, which provide a quarter of the funds used in contesting congressional elections, the influence of single-issue ideological interest groups is substantially stronger.

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