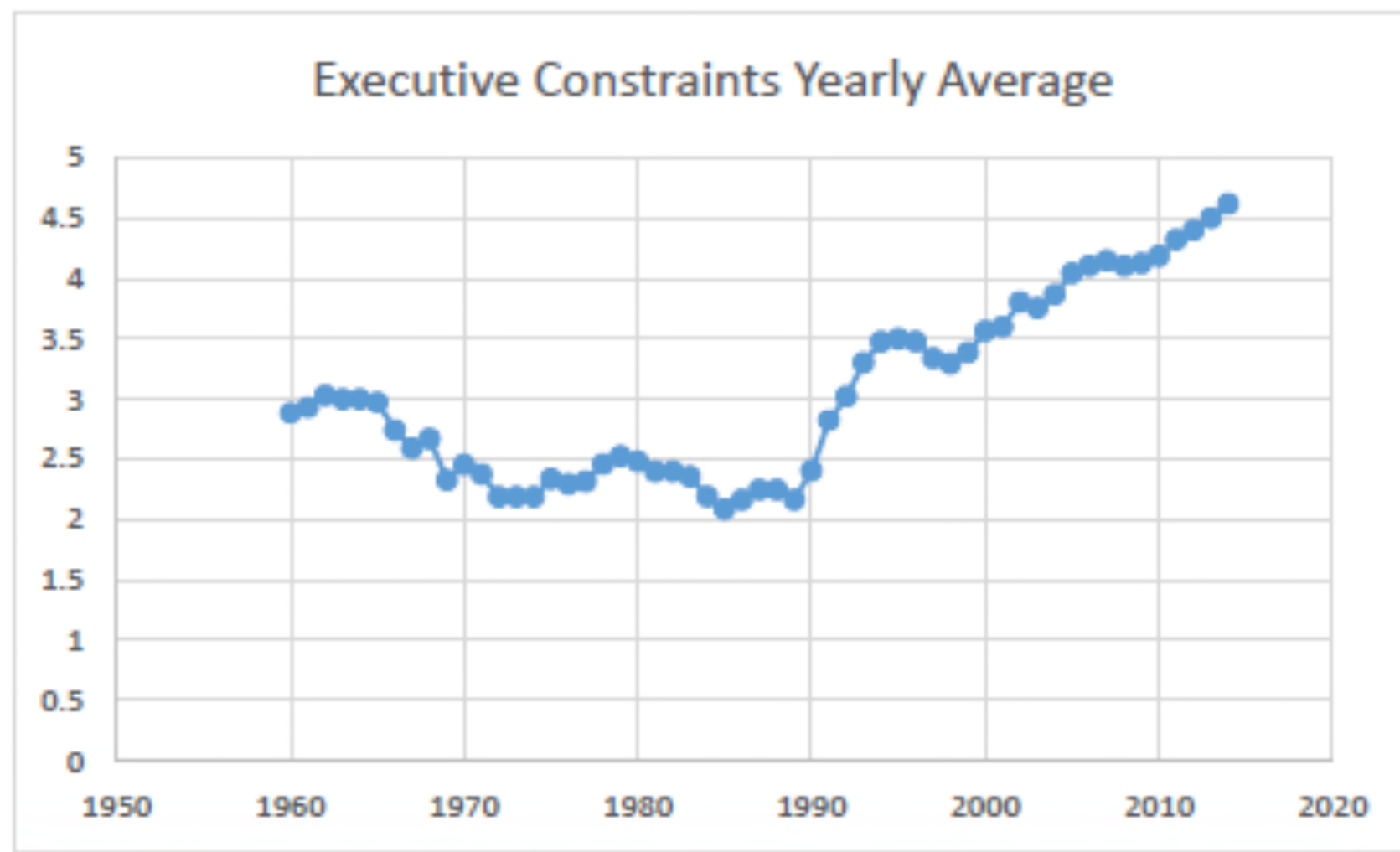


# Constitutional Bargaining, Eminent Domain, and the Quality of Contemporary African Institutions: A Test of the Incremental Reform Hypothesis

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## Appendix: The Unraveling and Rebuilding of African Constitutional Constraints, 1960–2013



Source: Polity IV Project, Political Regime Characteristics and Transitions, 1800–2013

# General Overview

- Incremental Constitutional Reforms
- Before Independence
- Britain VS France
- Independence Bargaining
- Property Protection
- After Independence
- After 1990s
- Statistical Analysis

# Incremental constitutional reform hypothesis

- The incremental constitutional reform hypothesis argues that durable constitutions are revised from time to time to take account of changes in circumstances.
- Most constitutions include formal procedures for amendment
- Whether the individual reforms exhibit trends or not depends on the interests of those with the authority to revise the procedures of governance.
- The incremental reform hypothesis has been shown to work well in explaining shifts of authority in Europe, Japan, and North America but has not been applied to the African experience

# Colonial Governance before World War II

- The French colonies were ruled by governors in Dakar and Brazzaville, subject to vetoes from Paris.
- The British colonies were run by appointed regional governors who were subject to instructions and vetoes from London.
- It should be noted, however, that the colonial powers lacked sufficient information and European manpower to govern their colonies from top to bottom.
- Consequently, colonial governance normally included elements of self-rule with native representatives

# Representation on the advisory councils

- The French began systematically assembling advisory councils during the early 1920s.
- In the late 1920s, after further bargaining by educated Africans, elections for seats on the advisory councils were held in which educated, French-speaking native Africans were entitled to participate.
- A similar administrative structure was in place in the British colonies, often referred to as indirect rule, although with fewer elected positions

# Autonomy and Independence after World War II

- World War II upset the prewar bargaining equilibrium between the French and British governments and their respective African colonies.
- Both the French and British desperately needed African supplies and manpower for their war efforts, which created new potential gains from constitutional exchange that favored African leaders and interests.
- De Gaulle agreed to provide home rule after the war was over.
- Churchill did not formally agree to do so, but accepted language in the Atlantic Charter of 1941 that suggested that Britain would also promote home rule and independence after the war.

# Autonomy and Independence in France's African Colonies

- The French process of transferring authority to its colonies in the post-war period was somewhat more centralized and uniform than that of the British.
- Much of it took place within the framework of French constitutional reforms.
- Shortly after WWII, there were elections for a new constituent assembly that included six African representatives elected via restricted suffrage.
- Colonial interests were thus directly represented in the drafting of the new French constitution.

# French Constitution

- A new constitution was adopted in 1946, which included a section that addressed colonial issues.
- It created a new French Union that included political representation for all of its colonies.
- Suffrage was expanded and local assemblies gained additional control of local policies, although civil law, military, and many other policies remained those of the French national government.
- In 1958 France adopted another new constitution and replaced the French Union with the French Community
- The new rules provided the territorial assemblies with greater authority over spending and legislation (article 72), while again reserving military and foreign policy for the French government

# Bargaining rather than revolution

- French assurances (and subsidies) persuaded its African colonial leaders that membership in the French Community would be more beneficial than independence.
- Seven of eight territories in French West Africa accepted the Constitution of the Fifth Republic of France with its French Community, although small groups in several of those French African colonies had been fighting for independence.
- Clearly, bargaining rather than revolution had determined the result.
- As a consequence, all the former French colonies in sub-Saharan Africa except Guinea had, and still have, political institutions that are remarkably similar (in names and organizational structures) to those of France

**Table 1. Voting Results for the Constitutions of the Fifth Republic of France**

<b>Territory</b>	<b>YES (%)</b>	<b>NO (%)</b>
Benin (Dahomey)	97.84	2.16
Burkina Faso (Haute-Volta)	99.18	0.82
Côte d'Ivoire	99.98	0.02
French Sudan	97.53	2.47
Guinea	4.78	95.22
Mauritania	94.04	5.96
Niger	78.43	21.57
Senegal	97.54	2.46

Source: Chafer 2002, p. 179.

Note: "NO" meant outright independence from France. "YES" meant accepting the Constitution of the Fifth Republic, which assured the French government continued authority in French Africa.

# Autonomy and Independence in Great Britain's African Colonies

- The transitions to independence in the British colonies were fundamentally similar, although more decentralized.
- The British government also took substantial steps toward greater colonial autonomy in its African colonies after WWII.
- Its colonial assemblies were given electoral foundations, and African representation on policy-making and advisory councils was increased.
- In contrast to France, however, the institutions for home rule were negotiated country by country with greater differences in institutional details and timing of elections.

# Colonial Representation

- Well-organized partisan groups lobbied for broader representation and suffrage, self-rule, and subsequently for independence, as well as for particular public policies of interest to their constituencies.
- Lawful public pronouncements and peaceful demonstrations were often combined with acts of civil disobedience, including larger-than-allowed demonstrations, refusal to pay taxes, boycotts, strikes, and occasional acts of violence (although not warfare).

# Britain VS France

- The British negotiated formal transitional (independence) constitutions along with formal schedules for independence during the 1950s.
- Constitutional details varied among countries in a manner that attempted to take account of ethnicity, religiosity, and historical relationships.
- The French negotiations were more centralized by the French constitution.
- Both sets of independence constitutions were “liberal” or of “high quality” in the sense that they were written documents
- It called for elected, representative national governments; and protected a variety of civil liberties, including private property, a (mostly) free press, and equal protection of the law.

**Table 2: Independence Dates of Former British and French Colonies**

British Colonies		French Colonies	
<i>Country</i>	<i>Date</i>	<i>Country</i>	<i>Date</i>
South Africa	5/31/1910 (fully recognized in 1931)	Tunisia	3/20/1956
Egypt	2/28/1922 (fully recognized in 1956)	Morocco	4/7/1956 (from France and Spain)
Sudan	1/1/1956 (from Egypt and Britain)	Guinea	10/2/1958
Ghana	3/6/1957	Cameroon	1/1/1960 (from Britain and France)
Somalia	7/1/1960 (from Italy and Britain)	Togo	4/27/1960
Nigeria	10/1/1960	Mali	6/20/1960
Cameroon*	1/1/1961 (from Britain and France)	Senegal	6/20/1960
Sierra Leone	4/27/1961	Madagascar	6/26/1960
Uganda	10/9/1962	Benin	8/1/1960
Kenya	12/12/1963	Niger	8/3/1960
Malawi	7/6/1964	Burkina Faso	8/5/1960
Zambia	10/24/1964	Côte d'Ivoire	8/7/1960
Tanzania	12/9/1964	Chad	8/11/1960
Gambia	2/18/1965	Central Africa Republic	8/13/1960
Botswana	9/30/1966	Congo	8/15/1960
Lesotho	10/4/1966	Gabon	8/17/1960
Mauritius	3/12/1968	Mauritania	11/28/1960
Swaziland	9/6/1968	Algeria	7/5/1962
Seychelles	6/29/1976	Comoros	7/6/1975
Zimbabwe	4/18/1980 (proclaimed in 1965)	Djibouti	6/27/1977

# Property Protection

- The relationship between secure property rights and economic development was clearly recognized by those drafting the transitional constitutions.
- For example, the *Report of the Kenya Constitutional Conference* (1962) explicitly mentions the importance of property institutions: “Only by this means will it be possible to maintain confidence and to encourage development and investment, including the attraction of overseas capital, not only in the immediate future but also in the long term” (Allen 2000, p. 59).

# Eminent Domain

- As a consequence, most of the transitional constitutions of the British colonies included strong eminent domain clauses.
- For example, the property clause of the Kenya Constitution of 1963 (Article 19-1) stipulates, “No property of any description shall be compulsorily taken possession of...except...so as to promote the public benefit...[and] that provision is made...for the prompt payment of full compensation.” Recipients of compensation were to be free to take their compensation out of the country without taxes or other fees and in the currency of their choice (Article 19-4).

# *mise en valeur* principle

- French civil law, in contrast, includes somewhat more elastic provisions for eminent domain.
- French law allows state “takings” under its *mise en valeur* principle. Under that principle, “abandoned” and “undeveloped” land automatically reverts to national ownership.
- In France, that provision would rarely apply, but in the colonies, *mise en valeur* allowed communal pasturelands, wastelands, and fallow fields to be taken by colonial and national governments and sold or given away to other parties without formal eminent domain proceedings or compensation.

# Portugal and Belgium

- Our study focuses for the most part on the former French and English colonies because their independence constitutions were products of negotiations and reform.
- This was less true of the former colonies of Portugal and Belgium, where negotiations were less fruitful; so native interests were less represented during colonial governance.
- Independence constitutions were also negotiated more rapidly or nonexistent.

# Portugal

- During the 1950s the colonies became an overseas province of Portugal. By the early 1970s, the colonies had become nonsovereign Portuguese states.
- They remained Portuguese territory but with somewhat wider administrative autonomy
- This, together with Portuguese policies of expropriation and forced labor, provoked peaceful demonstrations by Africans and also some armed conflict.
- For example, in 1961 black militias attacked both white and black civilians in northeastern Angola. Portugal responded by sending troops to quell the revolt.

# Colonial Wars and Policy Changes

- The colonial wars induced Portugal to revise its policies.
- In 1961 Portugal abolished forced labor and land expropriation. It also attempted to improve social and economic opportunities for Africans
- In 1974 a military-led coup ended the Portuguese government that had long opposed colonial independence (the Carnation Revolution).
- The new government was less interested in financing the suppression of African rebels and pledged to end the colonial wars.
- It began negotiations with the African independence movements and rapidly ceded independence to Portuguese Guinea in 1974 and Cape Verde, Mozambique, São Tomé and Príncipe, and Angola in 1975.

# Belgium

- Belgium was also relatively slow to include native Africans in colonial government positions and to negotiate over rights and local authority.
- As a consequence, it was subject to both peaceful protests, such as strikes and widespread refusal to pay taxes, and violence during the 1950s.
- To reduce tensions, the Belgian government agreed to a gradual transition to self-governance.
- Local elections in the Belgian Congo were held in 1957–58. In subsequent negotiations, Congolese leaders—especially Lumumba—demanded quick independence.

# Lumumba and Mubutu

- The Belgian government agreed to grant full independence by May 1960 as revolts spread and the cost of maintaining law and order increased
- The Belgian government withdrew its troops, and Belgian expatriates fled the country—leaving the Congo with relatively few experienced administrators
- Lumumba became prime minister of Congo and obtained substantial Soviet aid. He was assassinated in 1961.
- A few years later, General Mubutu seized power in a bloodless coup and used emergency powers to hold on to office for more than three decades, nationalizing foreign firms, and using them as sources of patronage

# After independence

- Independence provided different settings for constitutional bargaining theory.
- Because the results of bargaining in the French and British colonies were more liberal than Africans would have chosen themselves, subsequent constitutional reforms were likely to take an antiliberal direction.
- To the extent that some constitutions allowed easier amendment or larger steps to be taken (possibly because of differences in eminent domain laws), there would be more and greater anti-liberal reforms in the less-constrained countries.
- Liberal veto players had been removed from the bargaining tables.

# One Party Political Structure

- The first African national elections were normally held under the auspices of the departing colonial power.
- In most cases, the party organizations of the colonial independence movements won supermajorities in the new national assemblies and so controlled the first independent parliaments.
- The first presidents or prime ministers were similarly elected and were usually the most visible leaders of their independence movements.

# Reforms under one party

- The new elected independence parties often had supermajorities sufficient to adopt formal constitutional amendments.
- As a consequence, most of the transitional constitutions were reformed during the years immediately following independence
- The general architecture of government was normally preserved, but rules for competitive elections and free press weakened, eminent domain rules revised, and new emergency powers often created.
- The reforms often led to one-party states with strong executive offices and allowed many of the first generation of Africa's national leaders to remain in office for decades

# Coups

- Nonetheless, the reforms did not always produce the political security that their proponents evidently desired.
- The reforms made the executive office more enticing and often placed minorities at significant risk.
- As a consequence, most second and third generations of African rulers rose to office via coup d'état, rather than election.
- This was essentially the only route to high office after the first wave of constitutional reforms.
- In general, many more coups were attempted than succeeded

# Constitutional Reforms

- The procedures adopted by the new leaderships tended to further undermine liberal constitutional procedures and norms, rather than strengthen them.
- Consistent with a constitutional exchange–based, incremental, theory of reform, constitutions were rarely rewritten whole cloth during the period after independence.
- Changes in a few sentences, however, are often sufficient to significantly change the de juri operation of a constitutional government.
- For example, takings clauses were often revised to make eminent domain easier to apply, without totally eliminating their protection.

# Eminent Domain Reforms

- Most of the former British colonies eliminated clauses guaranteeing that compensation for government expropriation could be requested in international currencies paid to foreign accounts.
- Many also eliminated some of the restrictions for the use of eminent domain.
- Several countries added new emergency power clauses that further reduced the necessity for compensation for expropriation and, in a few cases, eliminated the concept of private property as applied to land and mineral rights.
- Only Botswana and Mauritius kept all of their transitional constitution's safeguards against property expropriation, including the repatriation clause for compensation (Read 1975; Ng'ong'ola 1992; Allen 2000).

# Weak Property Rights

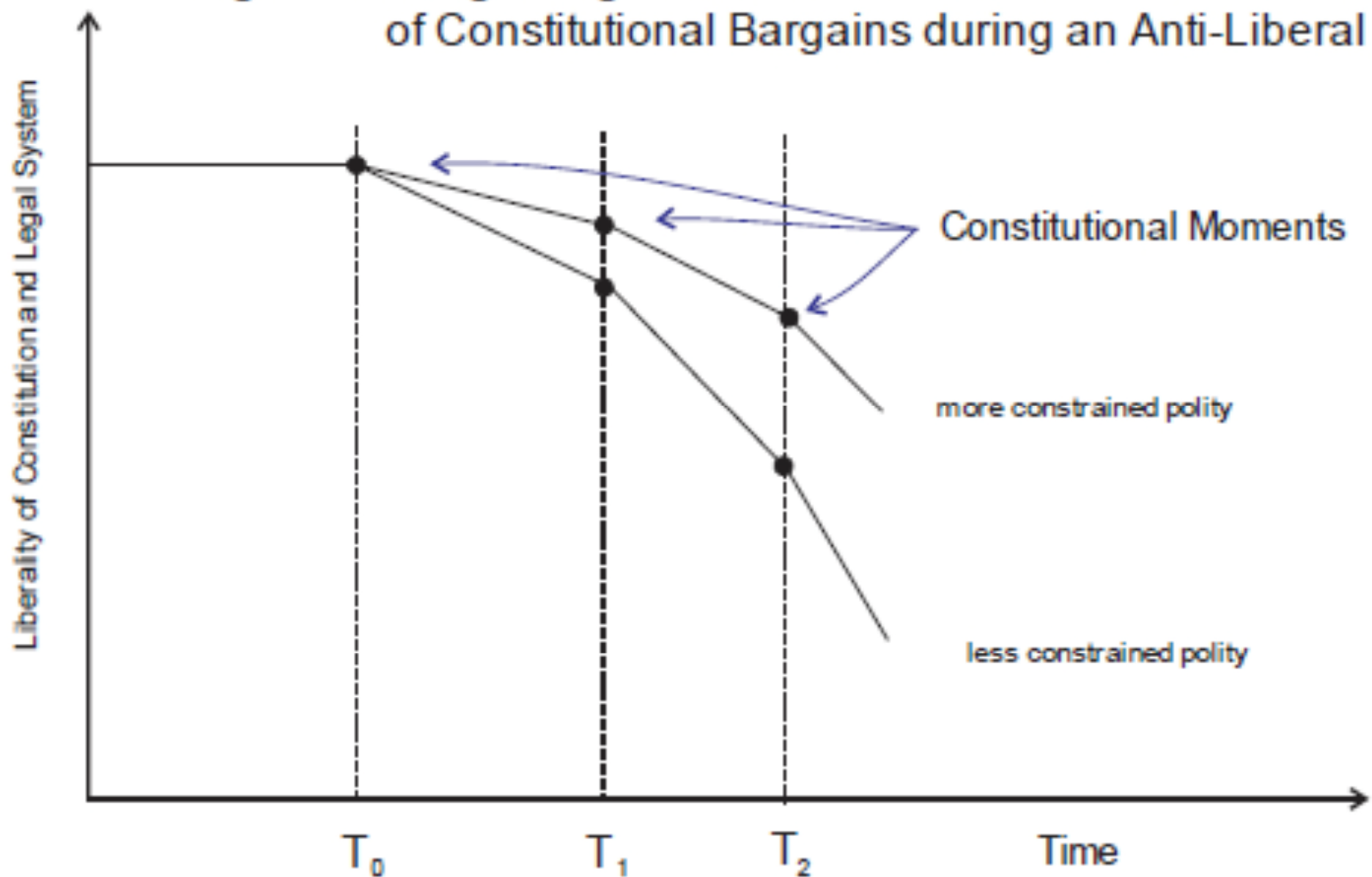
- Land Expropriation

- In Zambia "the President may, whenever he is of the opinion that it is desirable or expedient in the interests of the Republic so to do, compulsorily acquire property of any description"
- Section 3 of the Malawi Act uses the same language

- Compensation

- In Malawi the minister has the responsibility of assessing "fair compensation", and his award "shall be final and shall not be subject to any appeal, or to any review by any court".
- In Zambia the first assessment must be conducted by the minister. He is not bound to follow any such advice or recommendation. (Ng'ong'ola, 1992)
- The Zimbabwean provision refers to the 'compulsory acquisition of property without compensation.' (Allen, 2000)

Figure 1 : Bargaining within Broad or Restricted Domains of Constitutional Bargains during an Anti-Liberal Period



# After 1990s

- After the 1990s, a more liberal domestic bargaining environment emerged with increased domestic and international support for liberalization of legal and political systems.
- At this point, constitutional bargaining theory implies that the direction of reforms would shift in a liberal direction.
- For example, the 2013 report of the U.S. International Agency for Development's *Strategy on Democracy, Human Rights, and Governance* (p. 41) states, "the 1990s became the turning point in USAID's involvement in democracy promotion."
- Kimenyi and Shughart (2010) provide evidence of popular support for liberal reform in Kenya in the post-2000 period with competitive national elections and support for liberal constitutional reform, for example, with reduced executive authority.

# Unraveling tendency

- The independence institutions of the former European colonies served as initial conditions for subsequent constitutional developments.
- Colonial origin can thus be used as a proxy for the initial quality of political and legal institutions for reasons indicated in the historical overview.
- We assume that illiberal reforms are most likely to be adopted at times of crisis, especially in the period before 1990 because these often produce new tradeoffs (economic and political benefits and costs) that favor centralization of authority over civil liberties.
- An index for illiberal constitutional moments or an “unraveling tendency” is created by adding binary values for civil war, Communist aid, and more than two coup attempts.

# Communist/Foreign Aid

- Conditional grants can also create new gains from constitutional exchange. Insofar as Soviet aid was conditional, it tended to favor centralization and reductions in civil liberties.
- In the post-1990 period, Soviet aid diminished and Western aid was often conditional on liberalization, rather than anti-Communism, which would tend to have the opposite effect

# Polity 4

- We use the Polity 4 index and its executive constraint and political competition sub-indices as indicators for the nature of national governance.
- In the one-party states that often emerged after independence, it is the constraints on executive authority that provide the best evidence of constitutional governance, thus a good deal of attention is given to that sub index.
- We use a rule-of-law measure from a recent Worldwide Governance Indicators of the World Bank and the Civil Liberty Index of the Freedom House as indicators of these aspects of governance.
- We use the Ng'ong'ola (1992) classification of the extent to which eminent domain protections were kept or eliminated as a proxy for the scope of the domain of constitutional bargaining.

**Table 3: Descriptive Statistics for All African Countries, 1960–2013**

	Mean	Standard Deviation	Min	Max
GDP per capita in thousands of dollars	1.23	1.83	.069	15.91
Polity 4 index	-2.53	6.00	-10	10
Political competitiveness	3.80	3.14	1	10
Executive constraints	3.04	1.91	1	7
Unravel index	1.35	0.96	0	3
Civil war	0.29	0.46	0	1
Communist aid	0.62	0.48	0	1
Coup attempts (greater than 2)	0.43	0.48	0	1
British	0.36	0.48	0	1
British: keep all	0.02	0.19	0	1
British: keep some	0.26	0.44	0	1
British: keep few	0.06	0.23	0	1
French	0.42	0.49	0	1
Ethnic fragmentation	0.64	0.24	0	0.93
Log diamond production per million people	0.79	2.40	0	19.86
Number of days with rain	75.14	46.86	5	286
North Africa	0.10	0.31	-2.30	3.03
Average rule of law, 2000–2013	-0.69	0.64	-2.37	0.95
Average civil liberty, 2000–2013	4.23	1.39	1.21	7
Average executive constraints, 2000–2013	4.11	1.69	1	7

**Table 4: Panel Estimates of Polity Indices of Government Quality: Former British and French Colonies**

	2 Polity4 (upto1990)	3 Polity4	4 Political Competition (upto1990)	5 Political Competition	6 Executive Constraints (upto1990)	7 Executive Constraints
Unravel	-1.62**	-1.67**	-0.52**	-0.63**	-0.72**	-0.74**
(t-value)	(-8.24)	(-7.65)	(-6.70)	(-6.34)	(-10.34)	(-10.09)
Unravel*Post1990		2.93**		1.79**		0.74**
		(23.32)		(29.15)		(16.69)
French	-4.72**	-2.80*	-1.72**	-0.57	-1.63**	-1.16**
	(-3.40)	(-2.30)	(-2.61)	(-0.98)	(-3.32)	(-2.87)
Ethnic fragmentation	0.18	-1.68	-0.66	-1.73	0.44	-0.41
	(0.05)	(-0.55)	(-0.34)	(-1.26)	(0.35)	(-0.38)
North Africa	-2.16	-3.89*	-0.55	-1.51†	-0.24	-0.70
	(-1.03)	(-2.30)	(-0.43)	(-1.71)	(-0.34)	(-1.10)
Constant	-0.31	0.74	4.30**	4.97**	3.91**	4.53**
	(-0.11)	(0.35)	(3.14)	(5.41)	(4.61)	(5.92)
F statistics	79.94**	627.43**	53.40**	989.10**	116.81**	306.53**
R-squared	0.26	0.24	0.18	0.23	0.25	0.22
Breusch-Pagan Lagrangian multiplier test for random effects H0: No random effect	3984.45 Reject	5728.28 Reject	4442.46 Reject	4728.13 Reject	4739.15 Reject	5962.84 Reject
N	1060	1910	1060	1910	1060	1910

Table 5: Panel Estimates of Institutional Quality, All African Countries

	1	2	3	4	5
	Executive Constraints Up to 1990	Executive Constraints	Executive Constraints	Executive Constraints 2nd Stage	GDP 1st stage
Unravel	-0.65**	-0.63**	-0.55**	-1.23**	-457.32**
(t-value)	(-10.72)	(-10.13)	(-8.15)	(-10.24)	(-3.41)
Unravel*Post1990		0.76**	0.75**	0.79**	73.22
		(20.18)	(17.83)	(11.77)	(1.20)
GDP per capita (in thousand dollars)			0.05**	0.23**	Dependent Variable
			(2.72)	(4.39)	
British	1.08*	0.82*	0.77†	1.06**	-1109.09*
	(2.09)	(1.99)	(1.83)	(4.49)	(-2.29)
French	-0.51	-0.30	-0.21	0.04	-1980.00**
	(-1.46)	(-0.95)	(-0.64)	(0.20)	(-4.09)
Ethnic fragmentation	0.14	-0.59	-0.87	-0.91*	-1.93
	(0.15)	(-0.73)	(-1.05)	(-2.10)	(-0.00)
North Africa	-0.56	-0.97*	-1.25**	-1.97**	1151.98**
	(-1.07)	(-2.20)	(-2.88)	(-10.59)	(4.84)
Number of days with rain (1 <sup>st</sup> stage only)					18.77**
					(9.25)
Britain-kept all (1st stage only)					3190.28**
					(9.25)
Constant	3.00**	3.68**	3.68**	4.82**	2054.00**
	(4.42)	(6.33)	(6.11)	(13.41)	(5.25)
F statistics	122.01**	435.05**	411.88**	2630.59**	85.87**
R-squared	0.25	0.22	0.20		0.35
Breusch-Pagan Lagrangian multiplier test for random effects H0: No random effect	5788.64	8461.14	6686.67		Sargan Statistics 0.73 (p=0.39)
	Reject	Reject	Reject		
N	1324	2415	2144	677	677

**Table 6: Cross-Sectional Estimates of Contemporary Institutional Quality, All African Countries**

	Executive Constraints		Quality of Civil Law Institutions		Quality of Civil Liberty Protections	
	1	2	1	2	1	2
Unravell1994	-0.57*	-0.62*	-0.36**	-0.32**	0.63**	0.61*
(t-value)	(-2.34)	(-2.51)	(-4.58)	(-3.90)	(3.38)	(3.17)
British	0.69	0.63	0.38†	0.35†	-0.57	-0.65
	(1.17)	(1.11)	(1.98)	(1.77)	(-1.24)	(-1.42)
French	-0.38	-0.25	0.14	0.12	-0.19	-0.41
	(-0.67)	(-0.45)	(0.73)	(0.62)	(-0.43)	(-0.91)
Ethnic fragmentation		-0.60		-0.43		0.21
		(-0.61)		(-1.29)		(0.28)
North Africa		-1.72*		0.14		1.27†
		(-2.16)		(0.51)		(2.00)
Constant	4.95**	5.55**	-0.33†	-0.09	3.53**	3.43**
	(8.22)	(6.70)	(-1.75)	(-0.34)	(7.87)	(5.34)
F statistics	3.19*	2.97*	8.21**	5.48**	4.28**	3.25*
Adjusted R-squared	0.118	0.167	0.297	0.309	0.161	0.184
Breusch-PaganTest Statistic for homoscedasticity (chi square) H <sub>0</sub> : Constant Variance	2.29	1.25	0.93	0.42	0.50	1.91
	Accept	Accept	Accept	Accept	Accept	Accept
N	50	50	52	51	52	51

**Table 7: Cross-Sectional Estimates of the Effects of Declines in Eminent Domain Protections on Contemporary Institutional Quality**

	Executive Constraints		Quality of Civil Law Institutions		Quality of Civil Liberty Protections	
	1	2	1	2	1	2
British-kept all	2.44†	2.14†	1.33**	1.30**	-1.97*	-1.99*
(t-value)	(1.97)	(1.75)	(3.43)	(3.26)	(-2.02)	(-2.06)
British: kept some	0.50	0.52	0.32	0.29	-0.52	-0.63
	(0.79)	(0.84)	(1.64)	(1.49)	(-1.06)	(-1.32)
British: kept few	0.28	0.12	0.01	0.01	0.16	0.13
	(0.28)	(0.12)	(0.02)	(0.04)	(0.20)	(0.17)
French	-0.38	-0.26	0.13	0.11	-0.18	-0.40
	(-0.67)	(-0.47)	(0.75)	(0.63)	(-0.42)	(-0.90)
Unravell1994	-0.47†	-0.54*	-0.31**	-0.28**	0.57**	0.57**
	(-1.84)	(-2.12)	(-4.18)	(-3.54)	(3.02)	(2.89)
Ethnic Fragmentation		-0.42		-0.34		0.08
		(-0.42)		(-1.08)		(0.11)
North Africa		-1.61†		0.20		1.21†
		(-1.99)		(0.77)		(1.92)
Constant	4.79**	5.31**	-0.39*	-0.22	3.61**	3.59**
	(7.84)	(6.20)	(-2.19)	(-0.83)	(8.06)	(5.57)
F statistics	2.47*	2.44*	7.35**	5.62**	3.32*	2.91*
Adjusted R-squared	0.130	0.170	0.383	0.392	0.185	0.210
Breusch-PaganTest Statistic for homoskedasticity (chi square) H <sub>0</sub> : Constant Variance	0.17 Accept	0.09 Accept	0.01 Accept	0.33 Accept	0.00 Accept	0.08 Accept
N	50	50	52	51	52	51

# Conclusion

- The incremental theory of institutional evolution implies that contemporary institutions emerged from a long series of formal and informal reforms.
- This paper has provided evidence that contemporary African institutions also emerged from a long series of negotiations.
- In the colonial period, reforms were generally in a liberal direction. Participation in the policy-making process was extended to include more Africans and electoral institutions created and suffrage extended.

# Conclusion

- Circumstances favored illiberal over liberal reforms in the first decades of independence.
- Domestic and international interests became supportive of political liberalization in the 1990s, after which constitutional bargains had a liberal trend.
- British independence constitutions tended to be somewhat more stable than their French, Portuguese, and Belgian counterparts.