



# PLURALITY AND DISEMPOWERMENT IN AN ERA OF NEOLIBERAL DEMOCRACY: NIGERIA AND SOUTH AFRICA COMPARED†

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## **Resumo**

Este artigo baseia-se nas experiências contrastantes da Nigéria e da África do Sul para expor alguns paralelos interessantes na transição para a democracia na África contemporânea. Sem dúvida, várias questões foram levantadas em relação à democracia representativa e multi-partidária na Nigéria e na África do Sul. Isso porque os dois países ostentam suas credenciais democráticas, aspiram à liderança continental e possuem sonhos continentais inspirados em visões diferentes, populares, participativas e inclusivas. No entanto, a Nigéria e a África do Sul são dois dos países mais divididos da África, e o advento de suas respectivas dispensações democráticas indica que a democracia hoje é iniciada de acordo com uma agenda neoliberal e até agora não conseguiu produzir os resultados desejados.

## **Palavras-chave**

Pluralidade. Neoliberalismo. África. Democracia.

## **Abstract**

This paper draws on the contrasting experiences of Nigeria and South Africa to explore some interesting parallels in the transition to democracy in contemporary Africa. Undoubtedly, several issues have been raised regarding the representative and multi-party democracy in Nigeria and South Africa. This is in view of the fact both countries flaunt their democratic credentials, aspire for continental leadership and possess continental dreams inspired by differing visions that are popular, participatory and inclusive. Yet, Nigeria and South Africa are two of Africa's most divided countries, and the advent of their respective democratic dispensations indicate that the democracy in place today is initiated in line with a neoliberal agenda, and has so far failed to produce the desired outcomes.

## **Keywords**

Plurality. Neoliberalism. Africa. Democracy.

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## 1. INTRODUCTION

The debate on neoliberalism has mainly focused on changes in economic policies initiated by African states in the last two decades under the rubric of the IMF/World Bank-inspired Structural Adjustment Programme (SAP). The reform of state institutions, processes and procedures of governance have also been undertaken to reinforce reforms in the economy. While the neoliberal restructuring of the economy advocates the “free hand” of market rationality in the organization and functioning of the state in Africa, it also attempts to incorporate democratic institutions into a neoliberal political agenda. The promises of emancipation, liberation and socioeconomic inclusion which inspired the social contract in post-independent Africa, and more recently, in different waves of democratic transitions, are now being re-interpreted under the aegis of a hegemonic neoliberal project.

There has been a long-standing and enduring debate on democracy and democratization in African politics (Olukoshi 1998; Ihonvbere 1996; Ake 1993; 1994; 1996; 2000), but this paper draws on the contrasting experiences of Nigeria and South Africa to explore some interesting parallels in the transition to democracy in contemporary Africa. Undoubtedly, several issues have been raised regarding the representative and multi-party democracy in Nigeria and South Africa. This is in view of the fact both countries flaunt their democratic credentials, aspire for continental leadership and possess continental dreams inspired by differing visions that are popular, participatory and inclusive. Yet, Nigeria and South Africa are two of Africa’s most divided countries, and the advent of their respective democratic dispensations indicate that the democracy in place today is initiated in line with a neoliberal agenda, and has so far failed to produce the desired outcomes.

In Nigeria and South Africa, neoliberalism embodies certain political values, and these values have provided the ideological space and context for the understanding and practice of democracy. Using South African and Nigerian examples, the limitations and deficiencies of the neoliberal approach to democracy and its attendant reforms come to the fore when democracy and democratization processes are weighed in relation to issues of citizenship. The scrutiny of South African and Nigerian transitions to democracy is done against the background of fundamental issues of citizenship, equity, social justice, equitable redistribution of power and resources in a multi-ethnic or/and multi-racial setting, and how the “absence” or “deficit” of these factors disempower and offer the people no real choice. Ultimately, this deprives democracy of substance and meaning, and leads to what Mkandawire (1996; 1999) refers to as “choiceless” democracies.

This paper will address how these developments have unfolded in the African (Nigerian and South African) context through a broad range of core

questions. Whose democracy is in place? Is this a popular and inclusive democracy? Was it imposed on the people? What limitations are inherent in the ideological framework of this type of democracy? What possibilities exist for building viable and sustainable democratic projects in South Africa and Nigeria? What accounts for similar outcomes but different responses to democracy in Africa? What has been the impact of democratic struggles in different contexts? Is it sustainable in the long run? The arguments advanced here transcend the debates on 'political democracy', but incorporates 'economic democracy' (equal economic opportunities and a redistribution of wealth within Africa) and 'social democracy' (empowerment, inclusion and participation) both of which forms part of the democratic project but which democracy tends to counteract. The prevalent contexts in South Africa and Nigeria (since 1994 and 1999 respectively) capture the artificiality of the nation-state project and unveil the need for the transformation of the existing order. South Africa and Nigeria provides the context to re-examine the differences and similarities of the democratic project on the continent, but more importantly, it provides a useful method for generating, testing and understanding democratic theories, and democratization processes in the Global South.

The Nigerian and South African conditions provide the basis for analyzing how political leaders (and agents) enter and influence the process of democratization through the acquisition and manipulation of its ideological content, and how the current situation produce similar outcomes, but different responses in each context. The central argument is that citizenship, perceived as emancipation, empowerment, participation and autonomy is a necessary condition for democratization and democracy on the African continent. By far, the most enduring struggle in Africa, irrespective of the various waves of democratic transitions, has been about the whole notion of "states without citizens". The contrasting experiences of post-apartheid South Africa (since 1994) and post-transition Nigeria (since 1999) provide the context to examine the relationship between the state and citizenship-deficit in democratic African states. The analysis proceeds from a conceptual premise that accepts the universal value of democracy, but reiterates the need to contextualize, modify and particularize it to address the local conditions and realities on the African continent.

## 2. AFRICAN DEMOCRACY: THEORETICAL AND CONCEPTUAL APPROACHES

In concretizing the interface between democracy and democratization, and citizenship on the continent, it is important to delineated two ideologically opposed approaches or categories: the neo-liberal approach, and the liberationist approach. On the one hand, the neo-liberal approach tends to be global and comparative in nature, and is evaluated on the extent to which African states conform to liberalism (or liberal democracy) and power-sharing

arrangements (Osaghae 2005: 14). Democracy is examined in relation to “good governance” and “market reforms” typically in the form of SAPs, rather than in the form of a transfer of power to the people (Olukoshi 1998). Over the years, several indicators for the measurement of this type of democratic performance have emerged in the international community. They range from Joseph’s (1991) Quality of Democracy Index, Carter Centre’s Africa Demos, World Bank Governance Indicators, Brookings Institution’s Index of Failed States, Freedom House Index, Democracy Web, to the Mo Ibrahim Index of African Governance, among others.

During this period, “good governance” became the criteria for evaluating democratic transitions and this was morphed into a model known as the Washington Consensus. Originally intended as a set of precise and limited set of policy initiatives meant to address the crisis facing Latin American countries in the 1980s and 1990s, the Washington Consensus took on a far broader meaning within the Bank and the Fund which was to apply to the entire developing world (Williamson 1990; 1993). At the heart of this initiative was the idea of “good (political) governance” which were introduced in assessing the performance of African countries, and this idea became part and parcel of the cross/conditionality clauses of the World Bank, IMF and other donors (Olukoshi 2002: 23). The emphasis on “good governance” focused extensively on political democracy, rather than other aspects of democratic reforms which has been lacking on the continent. As espoused by the Bank and the Fund, this framework became too narrow, functional, technocratic and managerial, and tended to subordinate politics to a neoliberal framework which weakened active participation in politics in the face of a market orthodoxy.

On the other hand, the liberationist approach discerns the peculiarities of Africa’s democratic challenges, and seeks to deploy democracy and democratization for the public good and for broader emancipation and empowerment (Osaghae 2005: 15). The goal of the liberationist approach is to engage civil society in “real” terms to play a determinate role in the reconstruction of the state and binding the state to responsiveness, transparency and accountability, one that transcends the rituals of periodic elections, voting and being voted for, and seeks to elicit a new social contract that puts citizens at the centre of democracy and democratization processes (Osaghae 2005: 15). It emphasizes how the state can be strengthened in a social bargain that connects all political actors and guarantees popular participation in the democratization agenda. The central tenets of the liberationist agenda is the appropriation of the state based on domestic political consensus reached by progressive social/popular forces, and ultimately, repositioning it as a developmental instrument that is in real terms democratic and caters for the needs of the people.

As Osaghae (2005: 15) points out, the latter advocate a revolutionary-type transformation that is not elite-driven, but based on a groundswell of the

alliance of progressive forces and social movements intent on defending the autonomy of the political space. By challenging the exclusive monopoly of democracy, this process is elite-challenging and not elite-driven and pushes for a democracy that has popular anchorage. Its authenticity has to be measured by its local anchorage, a strong degree of local value added that is linked to local specificities and circumstances and not just an imposition from the external environment. Most of the transitions recorded in Africa witnessed the propping up of indigenous technocratic elites by the IMF AND World Bank who had no anchorage in domestic political processes and structures. This made democracy almost an entirely external imposition. Hence, the various responses to this top-down approach to democracy have emerged in most countries in Africa in the search for an enduring alternative.

### 3. DEMOCRATIC TRANSITIONS IN AFRICA

From 1974 to 1990, a global wave of democratization spread throughout globe as part of a continuing and ever-expanding “global democratic revolution” that will eventually reach every country in the world. This era of democratic transitions affected at least 30 countries globally and was regarded as the “Third Wave” of democratization (Huntington, 1991: 12). In an effort to shape a “New World Order” promised by President George H. W. Bush, neo-liberals equated the triumph of capitalism with global democracy, and argued that “freedom and respect for human rights will find a home among all nations” Most of the Third Wave democratizations processes swept through Southern Europe, Eastern Europe, Latin America, and Asia. By the mid-1990s, the Fourth Wave of global democratization building on the gains of the Third Wave included much of sub-Saharan Africa and continued into the early years of the twenty-first century.

The quest for Africa’s political restructuring were significant markers of the wave of global democracy and democratic reforms that swept through most African countries during this period. It initially appeared that sub-Saharan Africa had made enormous democratic gains by removing the so-called “big men” or life presidents from office, holding elections, delegitimizing one-party rule and military regimes, and paying lip-service to democratic norms. Under this wave of democratization, the continent witnessed the demise of the last vestiges of colonial rule and institutionalized racism when the struggles of the oppressed African racial majority in apartheid South Africa ended and ushered in the first multi-party elections in 1994. In Nigeria, Africa’s most populous country, there was a return to civilian rule in 1999 after decades of successive authoritarian military regimes and prolonged military-induced transitions. But in reality, these developments threw up mixed forces resulting in various outcomes, ranging from genuine transformations, relatively halted transitions, backslide into authoritarianism, to the intensified

crisis of the state, with majority of African states falling somewhere between the mix (Obi 2008: 5).

Coinciding with the collapse of the Berlin Wall, the disintegration of the Soviet Union, and the severe crisis of socialism in Eastern Europe, prominent Western leaders came to assume that liberal democratic capitalism would eventually spread to every corner of the globe. With the triumph over communism as proof, Western leaders, institutions and policymakers were engulfed in the global notion that liberal democratic capitalism would dominate the post-Cold War global order. The propagation of democracy hardly took into account the peculiarities and uncertainties in the Africa. During this period, free market and free politics proponents comprising of a large cadre of development experts at the World Bank, International Monetary Fund, finance ministries of Western Governments, Universities and think tanks joined forces in an effort to shape the proper route to political and economic liberalization (Kurlantzick, 2013: 60).

The point has to be made that the various aspects of these developments were welcomed without due regard to the context within which they were unfolding, and the inter-connectedness of these processes as part of a broader historical flow, and not as episodic events in isolation were ignored. Osaghae (2005: 2) points out that the analysis of the democratization project in Africa was seen as part of the hegemonic third wave of liberal democracy into which the African experience must fit into. Little or no attention was paid to the specific historical challenges that democracy and democratization is confronted within Africa, and the roles they are expected to play as a result. This has been described as an unprofitable mimicry of Western scholarship without a grounding of the discourse in African political thought (Ekeh 1997: 83), and an analytical subordination of African experiences to the experiences of others (Olukoshi 1999: 464). It is precisely for this reason that Africa's democratization process, by taking as its standard the global liberal democratic framework is perceived to have ignored the long-standing historical need to resolve the social contract and citizenship-deficit on the continent. The seeming decoupling of democracy and democratization from socio-economic issues of citizenship robbed the African experience of content and meaning, and limited democracy primarily to the "political", without due regard to its "social" and "economic" imperatives.

#### 4. NEOLIBERALISM AND DEMOCRACY: "REVERSE" EXPERIENCES IN NIGERIA AND SOUTH AFRICA

The realities of democracy on the continent contrasts sharply with the optimistic expectations of the latter approach. The inherent lack of capacity

by popular forces to appropriate the state constitutes a major setback to democracy on the continent. Given the failures of civil society and the susceptibility of NGOs to global capitalism and Western hegemony, there is no basis to suggest that the struggle for democracy is over or has been won. The reality of the situation is that there are advances, as well as severe limitations in the democratic projects in Africa. The main challenge is how to deepen democracy and make it relevant in material terms to the aspirations of the African people. This suggests the need for the struggle for another transition to democracy, or a third independence. From a broader frame of reference, Africa's first struggle was against colonialism, the second was against internal dictatorship, and the third will have to be aimed at transforming democracy to achieve popular participation, empower and inclusion.

Post-apartheid South Africa and post-authoritarian Nigeria have both witnessed sustained attempts at democratic reform and inclusiveness, but as Olukoshi (2002: 21) rightly points out, what has emerged in most of Africa is a situation in which the democratic experience lacks popular appeal and the political reforms that are implemented prove to be lacking in any meaningful socio-economic sense to address the citizenship-deficit on the continent. In their respective democratic dispensations, South Africans and Nigerians of all races and ethnic groups continue to challenge the state informally and formally through different platforms on issues of empowerment and inclusion. This appears to be a major phenomenon as issues of race and ethnicity, access to resources and power, and how they relate to state-society relations brings the issue of citizenship back to heart of the democratic experience in both countries.

## 5. DEMOCRACY, DOMINATION AND THE STRUGGLES OF RACIAL AND ETHNIC IDENTITIES

The number of ethnic groups in Nigeria provides the terrain for vigorous (and sometimes violent) contestations along complex ethnic, religious and regional lines (Smyth and Robinson 2001). Some of the issues that attract the fiercest contestation among ethnic groups are those that are critical to the citizenship rights, state ownership and legitimacy. Ake (1993: 20) rightly argues that, 'the vast majority of ethnic and national groups in this country (Nigeria) are increasingly feeling that far from being a fair deal, their incorporation into Nigeria is grossly oppressive'. This attests to the increasing alienation of most ethnic nationalities in Nigeria from the project of national unity, and has instigated pressures for the convening of a National Conference of ethnic groups that will serve as the very basis for the renegotiation of the nation-state project in Nigeria. As Osaghae (2005: 15) points out, although the National Conference model remains the closest mode of democratization to the liberationist ideal type which is capable of putting civil society groups in

charge of the process of transition and state reconstruction, it was truncated by agents of the state who acted in conjunction with external forces and domestic elites in most sub-Saharan African countries.

This immediately calls into the question the nature of the state and its susceptibility to ethnicity in the Nigerian context. Contrary to the cultural perception that sees ethnicity as having a largely cultural basis, its political aspects are very crucial due to the fact that apart from its mobilization and deployment which are aimed at deciding who gets what, when and how, it also holds enormous consequences for the political process (Osaghae 1995: 19). Several explanations have been offered for the salience of ethnicity in Nigeria, as Osaghae (1995: 20) points out, they include:

“the existence of state actions and policies which promote or intensify economic, social and political inequalities among ethnic groups, particularly, in a plural society like Nigeria; the established validity of the ethnic weapon in obtaining positive responses to demands on the state whose managers fear that ethnic demands which are unattended to constitute a threat to the stability of the state; the role of ethnicity in the competition for scarce resources and power-sharing between members of different ethnic extractions; the absence or the limited existence of social security nets and welfare policies programmes for citizens; the high degree of politicization regularly attributed to the zero-sum struggle for political competition, particularly, over control of the levers of state power. This in turn breeds anxieties, distrust and acrimony on issues bordering on representation in core government agencies (including the armed forces, public service and other sectors of the economy), and inserts considerations borne of ethnicity into most issues”

This inevitably translates the control of state power into the most crucial object of political competition because any group excluded from it perceives itself to be excluded not only from development, but from socio-economic privileges and benefits since the state remains the largest employer of labour and dispenser of patronage (Osaghae 1995: 23). Contending ethnic constituencies scramble and challenge each other with stern determination with the conviction that their ability to protect their interests and receive justice is co-terminous with their position in the balance of power. Genuine fear of being under the power of an opponent becomes real, thereby, breeding a huge craving for power, which is sought without restraint and used without restraint (Ake 1985; Post 1991: 37). These tendencies make the location of a group in the power grid in Nigeria very crucial (Osaghae (1995: 23). As the major means of social reproduction, the apparatuses of the state can be harnessed to serve the interests of one or a few groups to the exclusion of others. It is this reality that translates into a struggle and political competition for its control, which is accompanied by the ‘politics of anxiety’ (Ake 1985).

Since 1994, issues of race and racism remain among the most discussed topics in post-apartheid South Africa's nation-building project. Realizing the importance of race as a legacy of the apartheid regime, the term non-racialism became a buzz word on the eve of 1994 and continues to be so in the present day. One would agree with Everatt (2012: 5) that "while many social scientists demand rejection of race and ethnicity as mere social constructs, both carry significant weight in South Africa, both are real in the lives of citizens, and far too many politico-economic heavyweights are invested in race for it to disappear." Previous citizenship projects focused on the delivery of citizenship to a minority population and exclusion of the majority from the nation, instead providing them with partial or constrained citizenship or, for the black majority, reducing them to the status of denizens and allocating them citizenship of ethnic homelands (Hammet 2012: 74). However, the transition from apartheid to a democratic state in 1994 saw the granting of full citizenship to all, something which made it seem as if "the non-racial society had been born" (Taylor 2012: 41).

Over the years, the term non-racialism as it is applied in the South African context has become the object of study in both theoretical and empirical research (Baines 1998; Bentley and Habib 2008; Swartz 2006; Everatt 2012; Abrahams 2012). It is important to mention that non-racialism had been used during the apartheid era as a rallying cry for liberation movements such as the Congress Alliance (CA) and the United Democratic Front (UDF) before it eventually became the founding principles of the country's democratic constitution regardless of the view that it has no 'real meaning' (Everatt 2012: 6). Although it fought racism in the apartheid era, the African National Congress (ANC) held changing views regarding non-racialism such that even in practice it was only until the late 1960s that other races were permitted to join the party. In the 1950s, the Freedom Charter also made reference to non-racialism as the crux of ending apartheid. Often ANC leaders had preferred multiracialism as compared to non-racialism up until the transition to democracy in 1994. Mandela as leader of ANC and president of the new South Africa personally encouraged the ritual celebration of the 'rainbow nation' especially at international sports events such as the 1995 Rugby World Cup (Baines 1998). Recognizing the role of sports in uniting different racial groups, the state introduced legal instruments, such as quotas for national teams in order to effect the transformation of the sporting environment (Desai and Ramjettan 2008).

The reality is that there are ambiguities in South Africa's transitional democracy regarding the official view and ordinary citizens' thoughts about a future non-racial society (Everatt 2012). Depending on race, class, gender and disability among other categories, "South Africanness" means different things to different people. Bentley and Habib (2008: 110) argue that:

“It is choice and consciousness that defines one as a South African. A person is a South African because they want to be a South African—they live here and see this as home. People describe themselves as South Africans to the outside world by carrying this country’s passport and holding its citizenship. South Africanness is an identity constructed by political choice, even though it is manifested through geographic boundaries and national symbols”

Despite the consensus that emerged earlier on that South Africans potentially constituted one nation, several questions with respect to race, identity and agency remain unresolved (Cachalia 2012). Bentley and Habib (2008: 110) rightfully argue that addressing the national question is about the liberation of the African majority in South Africa, and that “South Africa’s transition was never about freeing the minority from oppression. It was about liberating a majority who were denied basic political and socio-economic rights.”

## 6. FRACTURED DEMOCRATIC EXPERIMENTS IN NIGERIA AND SOUTH AFRICA: RESPONSES AND REACTIONS

Perhaps, more than any other period in its post-colonial history, the return to civilian rule has opened up the public space and unleashed a host of hitherto suppressed and dormant ethnic forces in the country. Several studies have pointed to a noticeable upsurge in the outbreak of ethnic, communal and religious conflicts, which has had dire consequences for Nigeria’s national security and nascent democracy (Akinyele 2001: 264-5; Nolte 2004: 61; Adebawwi 2004; Agbu 2004). These developments have been closely linked to the emergence of both ethno-nationalist and religious groups within the expanded ‘democratic’ space, with each group staking its claims and driving a hard bargain against the state and its appurtenances of governance at the local and national level. Despite the variations in their struggles against the perceived exclusion from access to power and resources, these groups are similar to the extent that they incarnate salient strands of self-determination. This minimally translates into a quest for the de-centralization of power, group autonomy, and devolution of authority as presently constituted in Nigeria, and maximally into separatist agitations to exit from the Nigerian state into separate political and administrative arrangements.

The emergent scenario in both cases is one in which the failure to address the citizenship- deficit, either on its own terms or as part of the broader national question has compounded the challenge of nation-building. The contemporary version of these crises as it currently unfolds in South Africa and Nigeria must be viewed against the backdrop of Ake’s (2000: 167) argument that while political democracy and the opening up of the democratic space

have been achieved, the social transformation of society and the social conditions conducive to that democracy remain elusive. The state in both contexts, as in most African countries has failed to provide a full citizenship. One that would guarantee that all groups within the nation-state are given a platform and opportunity to fundamentally engage, or if need be, challenge and restructure the state in a manner that would guarantee the building of local democracy, develop strategies and mechanisms to continuously engage with citizens, and establish an equitable basis of belonging in the nation-state project.

In South Africa, popular uprisings for empowerment and inclusion, and social action remains a highly complex occurrence, and ranges from protests against lack of service delivery, periodic xenophobic outbursts against perceived non-citizens (outsiders), to protests against official government policy and the widening gap between citizens and their elected political representatives. As Southall (2010: 15) notes, a whole range of factors involved point the apparent dissatisfaction with the current system. These popular uprisings reflect a collective manifestation of the broader challenge in the South African society, and it reinforces the argument that South Africa, despite its recent democratic experience, is yet to resolve its citizenship-deficit as its democracy continues to disempower and offer its people no real choice.

As Southall (2010: 15) points out,

“Amongst the factors that would seem to be involved are feelings of relative deprivation, high levels of inequality within an increasing consumerist society, the failures of the educational system, high unemployment among blacks (notably young men), a lack of entrepreneurship and capital among South African black urban dwellers which is often visibly exposed by more successful foreign migrants, resentments against perceived corruption in government, and the lack of accountability of politicians and of officials”

Interesting to note is that while the majority of these voices of dissent are black who therefore constitute probably the most credible challenge to order in the democratic government, the issue of race appears to be more or less absent from the agenda. Rather, these protests revolve around very particular, local, bread-and-butter issues such as municipal service delivery rather than the broad ideological and emotional concerns that characterised politics during the transition and first decade of democracy (Terre Blanche 2006). This completely ignores issues of structural racism and structured power relations in the South African society that produces fundamentally distinct advantages and opportunities for different segments of the population. These social actions reflect a collective manifestation of the broader challenges in South Africa society, and reinforce the argument that South Africa is yet to resolve its citizenship-deficit as it remains divided along class, racial and ethnic lines.

## 7. CONCLUSION

No doubt, since the advent of their respective democratic dispensations, South Africa and Nigeria have witnessed interstices of democratic gains accompanied by remarkable levels of violence, tension and insecurity. Hence, it is clear that the struggle for democracy in Africa is far from being over in spite of the "Fourth Wave" of democracy which has continued even beyond the Arab Spring. Since the 1990s, the various waves of democratic experiences on the continent have carried their own seeds of inequality, poverty and exclusion, even in the context their so-called anchorage on popular participation. Granted that democracy is intrinsically universal and good appropriate for all, it must be realized that its anchorage on local conditions and realities is crucial in the bid to "modifying and particularizing the universal" (Obi 2008: 24). This is not an attempt to tropicalize democracy, but one geared towards making democracy relevant for the masses of the people in Africa.

Central to this objective is a rethink of the democratic agenda in a manner that makes actual meaning and impacts positively on the quality of lives of African peoples and strengthens the critical constituencies in African communities. This means that the democratic project must not just incorporate 'political democracy', but also 'economic democracy' (equal economic opportunities and a redistribution of wealth within Africa) and 'social democracy' (empowerment, inclusion and participation). These are necessary components of the democratic agenda which are currently being counteracted in the light of the contrasting experiences of South Africa and Nigeria.

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