

The African Small Island Developing States and normative coherence for sustainable development: The quality of civil rights and liberties

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Summary

Motivation: The literature on small states suggests that small island states are more likely than larger states to support regional and international democratic norms, but is this true of the six African small island developing states (ASIDS), an underexplored regional grouping? This article explores the ASIDS' normative commitment to regional democratic norms of civil rights and liberties.

Purpose: This article aims to answer the question: how normatively coherent are ASIDS with the normative development of regional civil rights and liberty norms promoted by the African Union (AU) through the Banjul Charter?

Methods and approach: The article adopts a normative conceptual lens in its outlook and uses quality of democracy methodology to compare the quality of selected regional civil rights and liberty norms across the ASIDS grouping.

Findings: The article finds that procedurally all ASIDS are coherent with the Banjul Charter norms on civil rights and liberties, but that local realities mean that substantive coherence to these norms is often slow or, in some cases, ineffectual. Cultural context, agency and capacity are equally important as size and 'islandness' in determining small island state democratic quality.

Policy implications: It suggests that political will for normative coherence for sustainable development (NCSD) within a region is not enough, at least for these island states. A real lack of capacity warrants greater regional support from continental Africa in the form of, among other things, financing, capacity building, expertise, peer review, and monitoring. Only through reinforcement of NCSD can the AU fulfil its rights-based mission.

Keywords: African Small Islands Developing States (ASIDS), civil rights, democracy, liberties, normative coherence for sustainable development (NCSD)

1 INTRODUCTION

This article falls within the broader literature on small states through its focus on small island developing states in Africa (ASIDS) and their adherence to the norms of democratic governance as outlined by their regional normative framework, the Banjul Charter. Growing literature suggests that many small states can be regarded as pro-democracy, norm entrepreneurs in world politics, and Sanchez, Cheeseman, Veenendaal, and Corbett (2021) contend that small island states, especially, are much more likely to be democratic than large continental states. This trend is supported by data from the Varieties of Democracy (V-DEM) project which offers several democracy indexes varying from low to high and which indicates that in 2019 all island states outperformed the regional average scores in the electoral democracy index and in the liberal democracy index.

Through a combination of inherited political, geographical and cultural characteristics, small island states would appear to have adopted a formula for democratic success. This is certainly borne out by the 2021 regional and international democracy and governance indices which score the ASIDS for civil rights and liberties. According to Freedom House (2020a), three of the ASIDS score highly out of 60 possible points for civil liberties (Cabo Verde (54), Mauritius (50) and Seychelles (43)), whereas Comoros and Guinea-Bissau rank poorly with 26/60 and 27/60. Freedom House does not rank São Tomé and Príncipe. Similarly, the Mo Ibrahim Index (2020), which scores African states in terms of good governance, places Comoros and Guinea-Bissau lower than the other ASIDS in terms of protection and promotion of rights. Cabo Verde is ranked first out of Africa's 54 states in this category, followed by Mauritius in third place and Seychelles and São Tomé and Príncipe tied in fifth place.

The reasons for this apparent democratic achievement amongst small island states more broadly have become an increasing point of interest in comparative and other studies. Sanchez et al. (2021) focus on size and geography in their analysis of five of the six ASIDS, arguing that 'smallness' and 'islandness' (insularity) have helped to maintain democracy in these islands and prevent authoritarian excess. However, Srebrnik (2004, p. 329), contends that there are wider examples of small island states where patronage and nepotism are degrading the degree of democracy and, "'islandness' has proved little protection against severe ethno-cultural cleavages and ... secessionist movements." Furthermore, Cheeseman (2021) adds that while size is important, so too are political leadership and socio-economic

context and so “for democracy then, just as in other areas of life, it is not just size that matters, but what you do with it.” Adherence to democratic governance norms, therefore, is a potentially important avenue of continued exploration to contribute to democracy and normative policy coherence for development debates in small state literature. Among the ASIDS, for example, Mauritius and Seychelles are lauded as role models for democratic success in Africa, but are they in a position to be seen as normative contributors in a wider framework of the AU’s normative commitments (as other small states have been in their respective regions, see Zupančič (2011))?

In this article, we ask to what degree do the ASIDS adhere to norms of democracy and especially the safeguarding of civil rights and liberties. This article brings together, for the first time, quality of democracy studies and normative coherence for development, in an assessment of the ASIDS and their adherence to civil liberty norms as outlined by the Banjul Charter to which they are all signatories.

The most important human rights norm document for Africa is the African Union’s Banjul Charter, also known as the African Charter on Human and Peoples’ Rights, which is an international human rights instrument that promotes and protects human rights and basic freedoms (liberties) across Africa. The Charter came into effect on 21 October 1986 and was inspired by various existing international human rights instruments. Like its European and American counterparts, the Charter creates a regional human rights system for Africa. Although it shares many features with other regional instruments, it has unique normative characteristics that are responsive to African circumstances. The Charter was inspired by African legal philosophy and it aims to respond to African needs while relying upon historical tradition and values of African civilization. For example, a communal approach to human dignity and values is promulgated.

Six of the 54 African states that have ratified the charter are small island developing states: the Comoros, Guinea-Bissau, Cabo Verde, Mauritius, the Seychelles and São Tomé and Príncipe. Apart from Mauritius, the other five island states are relatively new to democracy having transitioned in the early 1990s (Graham & Graham, 2016). As members of the AU, the ASIDS are bound by AU values, principles, and norms, among which are democracy and development. Since the adoption of the 2030 Agenda for Sustainable Development in 2015, the ASIDS have re-committed themselves to a shared global vision towards sustainable development for all. Arguably sustainable human development can only be achieved through the realization of human rights and fundamental freedoms. For clarity, human rights are fundamental rights that belong to every human being by virtue of the fact that they are human. Civil rights, on the other hand, are rights that one obtains by being a legal member/citizen of a certain political state. Civil rights require a government to act to ensure equal treatment for all, for example, to ensure non-discrimination. Civil liberties are freedoms guaranteed by the constitution.

Normative coherence for sustainable development (NCSD) is defined as the “coherent implementation of ... norms across development and non-development policies” (Häbel, 2020). Quality of democracy (QoD) studies emerged when scholars began to move away

from analysing the consolidation of democracies towards examining their health and sustainability. When one assesses the quality of democracy within states, one is attempting to ascertain the degree to which democracy is upheld in practice, for example, the degree to which civil rights and liberties are guaranteed and enjoyed by people in everyday life. Therefore, QoD is a framework or tool for assessing norm implementation just like NCSD. NCSD and QoD speak to each other but there is an absence in the development literature specifically linking the two. Quality of democracy (QoD) can be viewed as NCSD because democracy is a norm to which all ASIDS are committed. A common feature of many states is that rights that appear completely secure in legal or constitutional terms are not always upheld in practice. In other words, there is a significant incoherence between the *de jure* protection and *de facto* realization of these rights. While the Policy Coherence for Development (PCD) lens looks at states' formal and substantive commitment to regional norms (see Koff, 2020), QoD studies are similar in that they focus on the formal incorporation of these norms through constitutions and law (known as procedure) as well as the substantive implementation of policy (democratic outcomes).

The research question that this article aims to answer is how normatively coherent are ASIDS with the regional civil rights and liberty norms promoted by the AU through the Banjul Charter. It intends to do this by adopting a normative conceptual lens in its outlook and using quality of democracy methodology to compare the quality of selected regional civil rights and liberty norms in the ASIDS grouping. This study supports Veenendaal and Corbett's (2015) call to make better use of small states as case studies for larger questions in comparative studies.

2 REVIEWING THE LITERATURE

Defining small states is conceptually problematic (Sutton, 2011; Thorhallsson, 2018) and within small state literature definitions remain "imprecise and often pejorative" (Graham, 2017, p. 133). Generally, SIDS are "characterized by their smallness, remoteness, oceanic nature, insularity, and small population size, among other defining traits" (Wong in Neale, 2011). There is growing literature that contends that geographical smallness of states does not detract from their ability to adhere to norms, nor indeed to become advocates of norms promotion, in the international system (Corbett et al., 2019). Small state literature reveals that small states are not only implementers of regional norms but that they can also be norm entrepreneurs. Ingebritsen (2002) offers analysis on the role of Scandinavian countries as small states that, despite their weak militaries and economic dependence, actively exercise "social power" by promoting global norms related to eco-politics, aid provision and conflict resolution.

Scobie (2019) offers an exploration of the Caribbean SIDS and the link between regional and local contexts and global governance architectures and norms, to determine the nature of SIDS' environmental policies. Siitonen's (2017, p. 54) comparison of the Benelux and Nordic states, in reference to regional and sub-regional effects on development policies, finds that "norm diffusion takes place through the major international institutions but also that cooperation in sub-regional schemes may mould states' role perceptions and policies."

Much of the existing literature on the ASIDS as a regional grouping refers to their adherence to universal norms, particularly in relation to climate change and the blue economy (see for example United Nations Economic Commission for Africa, 2014) however, the ASIDS' normative commitment to regional democratic norms generally and in the area of NCS D more specifically is understudied, as is the application of QoD frameworks to assess this coherence (see Graham & Graham, 2016; 2019). From the above discussion on small states generally there is evidence to suggest that here is room for small island states to gain advantage from their adherence to accepted regional and international norms such as human rights, democracy, and development. As noted above, it is argued that sustainable human development can only be achieved through the integration and realization of basic rights and fundamental freedoms, which are democratic norms. The ASIDS have long acknowledged, via various international platforms, that observance of human rights is a key tool for promoting sustainable development and therefore place great value in the protection of the universal values of democracy (Human Rights Committee, Mauritius, 2017). Therefore, arguably, democracy (and the quality thereof) is normatively coherent with sustainable development.

As defined above, NCS D refers to the alignment of policies with core values on which democratic political systems are established, such as human rights and democracy (Koff & Maganda, 2016; Häbel, 2020). Developed by the European Union (EU) and the Organization for Economic Co-operation and Development (OECD) in the 1990s, policy coherence for development (PCD) was originally aimed at promoting development through international organizations and their member states (Koff, 2020). Since then, as contexts have evolved, so too has PCD's central role in the governance of sustainability partnerships for achievement of the Sustainable Development Goals (SDGs). Mbanda and Fourie (2019, p. 2) refer to five levels in which policy coherence for sustainable development aims to create policy coherence. One of these is particularly relevant to the focus of this article, namely, the coherence between regional agendas and national development priorities, in particular how commitment to regional democratic norms can add value to domestic sustainability.

This article contributes to the body of knowledge on policy coherence for development by examining normative coherence for sustainable development in relation to the African SIDS and the link to quality of democracy, in particular, to civil rights and liberties policy frameworks and implementation. It is important to note that this article cannot investigate all of the civil rights and liberties deemed important in ascertaining the quality of these freedoms in the ASIDS, for example, freedom of religion, privacy and property rights are excluded from this discussion. Therefore, only a certain number have been selected for review across the ASIDS.

3 METHODOLOGY

As noted above, this article uses a QoD framework in its assessment of ASIDS normative coherence with the Banjul Charter. When assessing the quality of democracy in a state, questions of degree are asked regarding the strengths and weaknesses that exist with the

goal of determining how democracies can be improved and deepened (Graham, 2015). That is, to what degree are state democratic procedures experienced and the essential democratic principles realized? This assessment of the quality of democracy is essentially qualitative. Data is obtained from a comprehensive review of the ASIDS' constitutions, legislation, official documents, official statistics, non-governmental and international organization reports, media, secondary literature, and expert reports. In addition, already existing universally acknowledged surveys, such as Freedom House, Afrobarometer, and the Mo Ibrahim Index, are also consulted.

This article examines the extent to which civil rights and liberties are upheld in these states and are therefore normatively coherent with regional norms espoused in the Banjul Charter. The following QoD indicators are examined: the existence and performance of National Human Rights Institutions; Freedom from intimidation and physical violation of the person (torture); Freedom of expression and in information and degree of interference by government; Freedom of assembly and association; Freedom for all to practice their own religion; and Women's rights, gender equality and freedom from discrimination. Two aspects are assessed in each indicator of democracy: procedure and democratic outcome. Procedural aspects refer to, for example, constitutional directives in place and legislation; whereas outcomes refer to the degree to which such constitutional directives and legislation have been upheld in practice. Both procedure and democratic outcome are represented using a (+) or (-) sign to indicate presence or lack of presence and implementation or lack of implementation, respectively. This simultaneously assesses how normatively coherent the ASIDS are with regional civil rights and liberty norms promoted by the AU.

4 THE NORMATIVE FOUNDATIONS OF THE AFRICAN CHARTER ON HUMAN AND PEOPLE'S RIGHTS (BANJUL CHARTER)

When the Organisation of African Unity, now the African Union (AU), was founded in 1963, its Charter did not explicitly obligate its member states to protect human rights. However, flagrant human rights violations by several brutal regimes following independence prompted African leaders to draw up the African Charter on Human and Peoples' Rights (also known as the Banjul Charter or the Charter). The Charter is a set of rules, called Articles, guaranteeing normative human rights principles and fundamental freedoms, with compliance monitored by the African Commission on Human and Peoples' Rights. This normative framework has expanded through a variety of protocols, such as the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (the Maputo Protocol). Even though it contains what could be termed "western adaptations," the Charter professes the "communal nature and spirit that characterised early African societies" and remains inarguably the continent's most authoritative human rights document (see Uwazuruike, 2017, p. 18). This is shown clearly in its emphasis on peoples' rights and duties. Also, as the predominant representation of Africa's normative standards, the Charter acts as the most appropriate tool for analysis based on the nature of its origin and continental buy-in (all African states have ratified it).

Articles 1–14 (and other relevant articles) in the Banjul Charter refer specifically to civil and political rights. While some scholars argue that its coverage of these rights in particular is inadequate (see Patrick-Patel, 2014), the Charter nevertheless remains the key normative source for the continent. These articles speak to the rights and freedoms (or liberties) that protect people from any other member of society, including governments, social organizations or private individuals, from infringing on their rights as well as being able to participate in political society, within the law, and without being discriminated against or repressed. In addition to civil rights, the assurance of overall equality in society is equally important. As such, it is necessary to note the existence of gender, cultural and ethnic discrimination, among others. This article cannot investigate the normative coherence of the ASIDS to all rights and liberties outlined in the Banjul Charter and its protocols but will focus on selected civil rights and liberties.

5 NCSD AND THE ASIDS

As stated above, the scholarship on small states contends that these countries are firmly committed to regional norms. This article examines this premise by analysing the implementation of civil rights and liberty norms amongst ASIDS. The following sections will examine ASIDS coherence for civil rights and liberties as promoted in the Banjul Charter. As noted in the methodology, the QoD indicators that will be used to assess this normative coherence are: the existence and performance of National Human Rights Institutions; Freedom from intimidation and physical violation of the person (torture); Freedom of expression and in information and degree of interference by government; Freedom of assembly and association; Freedom for all to practice their own religion; and Women’s rights, gender equality and freedom from discrimination.

5.1 Normative Commitment to Existence and Performance of National Human Rights Institutions (NHRIs)

Article 26 of the Banjul Charter declares that state parties have a duty to allow for the establishment and improvement of appropriate national institutions entrusted with the promotion and protection of the rights and freedoms guaranteed by the Charter. Therefore, National Human Rights Institutions (NHRIs) are statutory bodies established by governments in Africa, in accordance with this article, whose mandate is to promote and protect human rights institutions in their respective countries (Iroanya, Dzimiri, & Phaswana, 2018). From Table 1, it is apparent that while most ASIDS have NHRIs in place, many are not functioning optimally. São Tomé and Príncipe is not fully aligned with its regional normative commitments in this regard primarily because the institution overseeing human rights in that ASID is not, yet, independent.

Table 1: ASIDS and NHRIs

Pr = Procedure; DO = Democratic Outcome

	Regional Treaties/Instruments Signed and Ratified	Domestic Constitutional/Policy Frameworks	Pr and DO
Cabo Verde	Banjul Charter (BJ); African Commission on Human and People's Rights (ACHPR)	A draft of a revised statute of its National Commission for Human Rights and Citizenship which would ensure the Commission full independence from the Ministry of Justice and ensure adequate resources has not yet been adopted.	+ -
Comoros	BJ; ACHPR	The governmental National Commission for Human Rights and Liberties is mandated to investigate human rights abuses and to make recommendations to concerned authorities. For almost the whole of 2018, this Commission was non-functioning as the President had failed to swear in new commissioners.	+ -
Guinea-Bissau	BJ; ACHPR	The National Commission on Human Rights) is underfunded and rather ineffectual, although in 2018 it did recommend, considering evidence of inhuman conditions, the closure of four detention centres.	+ -
Mauritius	BJ; ACHPR	A National Human Rights Commission (NHRC) presents an annual report on its functioning and process. In 2019, the NHRC was able to conduct various activities, thanks to European Union funding, in which the promotion of the respect for human rights, as well as the universality and reciprocity of human rights, was promoted.	++
São Tomé and Príncipe	BJ; ACHPR	Although there is no independent human rights commission, a Human Rights Committee, under the Ministry of Justice and Human Rights, exists This committee is "moderately effective" proposing an inter-ministerial Human Rights Institute to address human rights concerns fully, but its lack of independence and neutrality is a concern.	--
Seychelles	BJ; ACHPR	A Human Rights Commission was established in 2018 by the Seychelles Human Rights Commission Act. Neutral and independent, this body checks the country's compliance with international conventions, treaties and charters but continues to face financial and human resource challenges.	++

Sources: National Human Rights Commission Mauritius Annual Report (2019); US Department of State, Comoros (2019); US Department of State, Guinea-Bissau (2019); US Department of State, São Tomé and Príncipe (2019).

From Table 1 it is evident that in the Seychelles and Mauritius, procedural elements are in place and implementation is also apparent; whereas Cabo Verde, Comoros and Guinea-Bissau are procedurally compliant but visible outcomes are lacking, so these latter three ASIDS are partially coherent in their normative commitment to the Banjul Charter. São

Tomé and Príncipe appears to be procedurally and substantively non-compliant and is therefore normatively incoherent in relation to this regional norm.

Table 2: ASIDS' Commitments to Freedom from Torture and Right to Liberty

	Regional Treaties/Instruments Signed and Ratified	Domestic Policy Frameworks and Implementation	Pr and DO
Cabo Verde	Banjul Charter; 2002 Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT)	Article 29 of the constitution prohibits torture. Torture was criminalized and was classified as a crime against human dignity. It carried sentences ranging from two to six years in prison, or from five to 12 years in cases of aggravated crime.	++
Comoros	Banjul Charter	Article 20 of the constitution prohibits torture and Article 22 guarantees citizens the right to liberty.	+ -
Guinea-Bissau	Banjul Charter	Article 37 states that “No one shall be submitted to torture or to cruel, inhuman or degrading treatment”.	+ -
Mauritius	Banjul Charter; OPCAT	Section 7 of the constitution prohibits torture and Article 78 of the state’s criminal code makes torture a crime with those liable being subject to a fine not exceeding 150,000 rupees and to imprisonment for a term not exceeding 10 years. Established under the country’s National Human Rights Commission, Mauritius’ National Preventive Mechanism Division investigates any complaints made by a detainee.	++
São Tomé and Príncipe	Banjul Charter	Article 23 of its constitution prohibits torture and Article 215 of the country’s Criminal Code includes provisions on torture and other cruel, degrading, and inhuman treatment.	+ -
Seychelles	Banjul Charter	In Article 16 of the constitution, every person has a right to be “treated with dignity worthy of a human being and not to be subjected to torture, cruel, inhuman or degrading treatment or punishment”.	+ -

Sources: Ninth to Tenth Combined Periodic Report of the Republic of Mauritius on the Implementation of the African Charter on Human and People’s Rights (2019, p. 59); Human Rights Council (2015, p. 4).

5.2 Normative Commitment to human dignity: Freedom from intimidation and physical violation of the person (torture) and the right to liberty and security of the person

Article 5 of the Banjul Charter pertains specifically to human dignity and the prohibition of threats, such as torture, to liberty and security of the individual: “Every individual shall have the right to the respect of the dignity inherent in a human being and to the recognition of his legal status. All forms of exploitation and degradation of man, particularly slavery, slave trade, torture, cruel, inhuman or degrading punishment and

treatment shall be prohibited.” This Article is reinforced and supplemented by other Charter provisions, such as guarantees of equal protection under the law, the right to life and integrity, including liberty and security and fair trial and due process guarantees. Citizens are entitled to feel secure and protected in their daily lives. However, while a country may embrace *de jure* constitutional rights, this does not guarantee *de facto* enjoyment of these rights. Are there transgressions by the state in the form of torture or other cruel, inhumane, or degrading treatments or punishments?

As seen in Table 2, in their commitments to freedom from torture and right to liberty, Mauritius and Cabo Verde are normatively coherent with the Banjul Charter. Moreover, only Cabo Verde and Mauritius have ratified the 2002 Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT). OPCAT establishes a monitoring mechanism to prevent torture and other cruel, inhuman, and degrading treatment or punishment. Ratification, and subsequent legislation of OPCAT, would be a critical indication and commitment of the government to the eradication of torture. Comoros, Guinea-Bissau, São Tomé and Príncipe and the Seychelles have found it more difficult to uphold this democratic outcome in practice. The Seychelles, for example, has yet to adopt legislation that expressly criminalizes torture and it has not yet established a National Preventive Mechanism in compliance with international standards (Report of the Human Rights Promotion Mission to the Republic of Seychelles, 2015, p. 67).

5.3 Normative Commitment to Freedom of Expression

Article 45 (1) of the Banjul Charter requires the African Commission to promote human and peoples’ rights by laying down principles and rules to solve legal problems relating to human and peoples’ right and fundamental freedoms upon which African states may base their legislation. In pursuit of this Article, the Declaration of Principles on Freedom of Expression in Africa was adopted by the Commission in 2002. In 2019, to conform with emerging issues in relation to Article 9 of the African Charter which guarantees individuals the right to receive information as well as the right to express and disseminate information, this 2002 Declaration was replaced by the Declaration of Principles of Freedom of Expression and Access to Information in Africa.

For the most part, the ASIDS abide by this Declaration of Principles on Freedom of Expression in Africa with regard to media freedom and people’s right to free expression. From Table 3, it is apparent that ASIDS also struggle with finding the balance between adhering to these normative commitments in practice and ensuring that these freedoms do not come at the expense of the guaranteed freedoms of others. Of all ASIDS, São Tomé and Príncipe is the only state that is visibly compliant with both procedure and outcome and is coherent with this Banjul norm. Although Mauritius’ Constitution protects freedom of expression, this has been threatened by an amendment of the Information and Communication Technologies (ICT) Act, in late 2018, which some critics believe allows for the Mauritian government to systematically silence Internet users. Increased penalties of up to 10 years’ imprisonment for wrongdoing is clearly disproportionate. Similarly, in

Table 3: ASIDS' Commitments to Freedom of Expression

	Regional Treaties/Instruments Signed and Ratified	Domestic Policy Frameworks and Implementation	Pr and DO
Cabo Verde	Banjul Charter; AU's Declaration of Principles on Freedom of Expression in Africa (2002) (The Declaration)	Constitutionally protected, procedural policies and institutions are in place that ensure that freedom of expression is promoted, namely: an independent press, a democratic political system that is operational, and a working judiciary. Evidence of censorship within the press is generally self-imposed and linked to career goals in the public sector media or social connections which makes exposés difficult.	+ -
Comoros	Banjul Charter; The Declaration	Constitutionally guaranteed, however, nobody can criticize the government or share unrestricted public opinion contrary to the goals of the state and libel is punishable. Independent media are active but restricted and self-censorship is evident.	+ -
Guinea-Bissau	Banjul Charter; The Declaration	Constitution protects a free press and allows for media diversity. Although in the past journalists have been intimidated and harassed for any negative reporting on politicians, this and other forms of censorship have decreased in recent years.	+ -
Mauritius	Banjul Charter; The Declaration	Chapter II of the Constitution protects the freedom of expression of individuals, for example the right to hold opinions and receive information without interference.	+ -
São Tomé and Príncipe	Banjul Charter; The Declaration	Constitutionally guaranteed freedoms of expression.	++
Seychelles	Banjul Charter; The Declaration	Public Assembly Regulations 2019 Act: Speaker's Corner, in Freedom Square in the capital city Victoria, where citizens can exercise their fundamental right to freedom of expression, but citizens are expected to use and not abuse this platform.	+ -

Sources: AU's Declaration of Principles on Freedom of Expression in Africa (2002); US Department of State, Cabo Verde (2019); US Department of State, Comoros (2019).

the Comoros, there is also concern that the penalty for defamation is disproportionate—a custodial sentence of 18 months—and yet there is also a recognition of the need to balance freedom of expression with the protection of other rights (US Department of State, Comoros, 2019). Journalists have been arrested for allegedly insulting government officials and inciting hatred and public disorder through defamation. Daily newspapers have been blocked from printing stories concerning the harassment of journalists. The same is evident in Cabo Verde, where freedom of speech is generally upheld, but the government does not permit hate speech. In a recent development the Media Regulatory Authority (ARC) and the Cabo Verdean Association of Journalists (AJOC) responded in protest to a

newly published Code of Ethics and Conduct, attributed to the Cabo Verde Television and Radio (RTC) board of directors, considering it an abuse of freedoms of the press and expression. The code undermines journalist freedoms and violates the constitution, according to the ARC and the Community of Portuguese-Speaking Countries (CPLP) Federation of Journalists. AJOC characterized the code as censorship and called for its suspension (US Department of State, Cabo Verde, 2019).

Table 4: ASIDS’ Commitments to Freedom of Assembly and Association

	Regional Treaties/Instruments Signed and Ratified	Domestic Policy Frameworks and Implementation	Pr and DO
Cabo Verde	Banjul Charter; Guidelines on Freedom of Association and Assembly	The constitution allows for assembly and association if they are peaceful.	++
Comoros	Banjul Charter; Guidelines on Freedom of Association and Assembly	Article 23 of the Constitution speaks to freedom of assembly and association. There is evidence of the government preventing the right of groups to gather.	+ -
Guinea-Bissau	Banjul Charter; Guidelines on Freedom of Association and Assembly	Article 45 speaks to freedom of association. The right of groups to gather freely has often been restricted in the past.	+ -
Mauritius	Banjul Charter; Guidelines on Freedom of Association and Assembly	Article 13 of the Constitution speaks to freedom of assembly and association.	++
São Tomé and Príncipe	Banjul Charter; Guidelines on Freedom of Association and Assembly	Articles 33 and 34 of the Constitution articulate the right to meet and to demonstrate and freedom of association respectively.	+ -
Seychelles	Banjul Charter; Guidelines on Freedom of Association and Assembly	Article 23 of the Constitution speaks to freedom of assembly and association; Seychelles, civil servants have also reported feeling intimidated and victimised for attending opposition party activities.	+ -

Sources: US Department of State, Comoros (2019); Freedom House (2020); Guidelines on Freedom of Association and Assembly in Africa (2017)

5.4 Normative Commitment to Freedom of Assembly and Association

Articles 10 and 11 of the Banjul Charter guarantee people’s rights to association and assembly, respectively. In Table 4 it is evident that procedurally, the ASIDS have constitutional directives in place that reaffirm their commitment to regional norms on these civil liberties, however, only Mauritius and Cabo Verde appear to be upholding these in practice. In the Comoros, marching protestors, unhappy with “irregularities” in the March 24, 2019 presidential elections, were dispersed by police using tear gas, gunfire, and barricades. Throughout the year, the Interior Ministry banned all union and social demonstrations and when public school teachers planned a peaceful protest for March 7, 2019, the area was blocked by security forces (US Department of State, Comoros, 2019). Similarly, in Guinea-Bissau a student march in protest of striking teachers and school closures in February 2019 was violently suppressed by police. Moreover, similar planned

marches for May 2019 were prevented from taking place. However, despite these incidents, political rallies linked with the elections were carried out peacefully, suggesting some improvements in the right of people to assemble freely (Freedom House, 2020b). It is evident that four of the ASIDS are partially normatively coherent with Banjul Charter and two are coherent.

Table 5: ASIDS’ Procedural Commitments to Freedom for all to Practice their own Religion

	Regional Treaties/Instruments Signed and Ratified	Domestic Policy Frameworks and Implementation	Pr and DO
Cabo Verde	Banjul Charter	All citizens are protected by the constitution in relation to choice of religion. In accordance with the constitution and international law, there is freedom of religion and worship and the state and religion are separate.	++
Comoros	Banjul Charter	The constitution states that Islam is the official religious reference of the state and its citizenry and, in particular, the Shafi’i school of Sunni Islam which outlines the principles and rules regulating life in the Comoros.	+ -
Guinea-Bissau	Banjul Charter	The constitution protects legally recognised religious groups.	+ -
Mauritius	Banjul Charter	The Mauritian constitution protects its citizens from discrimination based on religious beliefs. Low level tensions continue between Hindu and Muslim groups but in practice, Mauritian society reflects a multicultural, diverse heritage, with roots in Africa, Asia, and Europe.	++
São Tomé and Príncipe	Banjul Charter	São Tomé and Príncipe is a secular state and its constitution protects freedom of religion.	+ -
Seychelles	Banjul Charter	The constitution protects freedom of religion as well as prohibits compulsory religious education.	+ -

Sources: Human Rights Council (2019, p. 15); US Department of State (2019b); US Department of State (2019c); US Department of State (2019d); US Department of State (2019f); US Department of State (2019e); US Department of State (2019a).

5.5 Normative Commitment to Freedom for All to Practise their own Religion

According to Article 8 of the Banjul Charter, the profession and free practice of religion are guaranteed, and these freedoms are protected “subject to law and order.” In Table 5, it is evident that all the ASIDS are procedurally aligned and therefore partially coherent with this Banjul norm. However, there are substantive challenges in the implementation of this norm. While there may be some low-level religious tensions in all the ASIDS, the Comoros, Guinea-Bissau and Seychelles have experienced more overt religious-based conflict. To avoid the threats of terrorism or radical proselytism as well as the inclination

by some “to use religion to sow division,” in the Comoros the Sunni religion is upheld by the government as the backbone of social harmony. Nevertheless, foreigners are permitted to worship in specific places, for example, there are two Christian churches in Moroni and Mutsamudu. However, freedoms of religion and belief have been violated before despite constitutional protections and so, in practice, there is inconsistency between domestic laws, which are enforced, and the regional treaties and conventions to which the Comoros has become a party. The laws regulating religion are strict and heavily reinforced by penalties such as imprisonment, substantial fines (100,000 to 500,000 Comorian francs), and deportation, if non-Sunni religious practices are promoted in public spaces (US Department of State, 2019b).

In Guinea-Bissau, the religious tolerance that has been evident in the society, for the most part, has recently been threatened by “imams’ concerns about the increase in Salafist Quranic schools, new mosques with ‘unvetted’ imams, [and] online recruitment of youth to religious radicalism.” For example, in 2018, the government failed to address a call from the governor of Gabu Region, to respond to a perceived increase in “stricter” Islamic practices in that region (US Department of State, 2019c). In São Tomé and Príncipe, in particular, it has proven difficult to align indigenous practices with universal norms. For example, a cultural belief in witchcraft in the community is prevalent and this belief is targeted as the cause for the delay in treatment of children or treatable ailments in adults, through Western medical means, causing unnecessary suffering to individuals. The government of São Tomé and Príncipe has received recommendations from the United Nations (UN) to examine its legislation on these issues and other harmful traditional practices (Human Rights Council, São Tomé and Príncipe, 2015, p. 5). Although a secular state, the Seychelles government frequently consults with an interfaith group, the Seychelles Interfaith Council (SIFCO), on issues directly affecting religious groups such as a possible amendment to the Registration Act as well as broader issues such as prison reform, substance abuse, and national unity. A note of concern exists in relation to some public schools offering Catholic instruction only, where the non-Catholic students in those schools have no recourse to other forms of instruction (US Department of State, 2019e).

5.6 Normative Commitment to Women’s Rights and Gender Equality

As AU members, the ASIDS have all reaffirmed their commitment to gender equality through their ratification of the 2003 Protocol to the African Charter on Human and Peoples’ Rights on the Rights of Women in Africa, widely known as the Maputo Protocol. Procedurally, there has been progress in improving *de jure* gender equality across the ASIDS (see Table 6). Women are protected from discrimination through provisions in their constitutions and through various gender-relevant pieces of legislation, however, challenges of implementation remain, and this therefore indicates only partial normative coherence with this Banjul norm.

Table 6: ASIDS' Commitments to Women's rights and gender equality

	Regional Treaties/Instruments Signed and Ratified	Domestic Policy Frameworks and Implementation	Pr and DO
Cabo Verde	Banjul Charter; Maputo Protocol	Article 1.2 of the Constitution goes beyond a general acknowledgement of equality to prohibit, specifically, discrimination based on sex, and actively mandates the government to remove the obstacles to equal opportunity; See also Articles 47 and 54.	+ -
Comoros	Banjul Charter; Maputo Protocol	Articles 30, 34 and 36 guarantee women the right to protection, the right to stand for election and the fair and equitable representation of men and women in the government; A national strategy exists to combat violence against women and minors.	+ -
Guinea-Bissau	Banjul Charter; Maputo Protocol	Articles 24 and 25 of Guinea-Bissau's constitution. The Institute for Women and Children is responsible for advancing gender equality and women's empowerment with oversight and guidance from the Ministry of Women, Family and Social Cohesion; Landmark law against domestic violence (2013), and another banning the practice of Female Genital Mutilation (2011).	+ -
Mauritius	Banjul Charter; Maputo Protocol	Article 16 in the Constitution. National gender machinery exists to oversee the implementation of gender policies, most prominently, the Ministry of Gender Equality, Child Development and Family Welfare (MGECDFW).	+ -
São Tomé and Príncipe	Banjul Charter; Maputo Protocol	Article 15 of the Constitution states that women are equal to men in rights and obligations. Women are entitled to fully participate in political, economic, social, and cultural life; law strengthening the legal protection mechanisms for victims of crimes and domestic and family violence (Act No. 12/2008).	+ -
Seychelles	Banjul Charter; Maputo Protocol	Preamble of the Seychellois constitution. Domestic Violence Act 2020, which criminalizes domestic violence as well as provides protection to male victims of domestic violence.	+

Sources: AGDI (2018, p. 53); African Development Bank (2015, pp. 16, 17).

Substantive normative commitment to *de facto* gender equality across the ASIDS is more varied and much work needs to be done to improve gender equality. Despite some limited success, various concerns remain. It seems a slow task to eradicate the cultural norms and

traditions that impose gender roles and contribute to *de facto* gender-based discrimination. In Guinea-Bissau, for example, women’s basic rights are still violated by limiting access to education, health, justice services, and inheritance (African Development Bank, Guinea-Bissau, 2015, p. 17). In Cabo Verde, São Tomé and Príncipe, Comoros, and Mauritius too, patriarchal attitudes and stereotypes concerning the roles of women and men tend to prevail (UN Committee on the Rights of the Child, 2019; The World Bank, 2019, p. 28). In Mauritius “prevailing norms, values and culture constitute barriers to the promotion of and realisation of gender equity in the country. The lack of expertise at the level of institutions, especially regarding gender issues, has resulted in a slower implementation of gender sensitive policies, projects, and activities” (AGDI, 2018, p. 7). Although the Seychelles’ Domestic Violence Act of 2020 is a promising step forward for women’s rights protection, there is a long history of abuse to correct. For example, more than 5,400 cases were registered between 2009 and 2019. This situation would need to be revisited in a few years to ascertain the efficacy of this new Act (The Commonwealth, 2020). A common theme also emerging across the ASIDS manifests in women’s economic inequality, lack of agency and limited access to wealth-generating opportunities (US Department of State, Cabo Verde, 2019, p. 22).

5.7 Normative Commitment to Non-Discrimination

Article 19 of the Banjul Charter states that “All peoples shall be equal; they shall enjoy the same respect and shall have the same rights. Nothing shall justify the domination of a people by another.” Among the ASIDS (see Table 7), Mauritius leads the way in promoting inclusive equality and protecting vulnerable groups from discrimination. Citizens who believe their rights to be contravened because of discrimination may apply to the Supreme Court for redress (Section 17). This is supported by the Mauritian Criminal Code which also makes provisions for offences, and related penalties, in relation to discrimination in general. Mauritians found guilty of “stirring up racial hatred” are subject to a fine not exceeding 100,000 rupees and penal servitude for a term not exceeding 20 years. Most Mauritians show tolerance for people of a different ethnicity, religion, or nationality and increasing public tolerance of the Lesbian, Gay, Bisexual, Transgender, Queer/Questioning (LGBTQ) community finds expression in public respect for the right to conduct legally authorized marches annually (Afrobarometer, 2018). When it comes to discrimination against the LGBTQ community, the ASIDS face a dilemma manifesting in a clash of values: international norms promoting non-discrimination on the basis of sexual orientation, and arguments promulgated by Africans that homosexuality contravenes African values and traditions (Viljoen, 2019). Polling by Afrobarometer between 2016 and 2018 found that 78% of Africans across 34 countries were still intolerant of homosexuality (Council on Foreign Relations, 2020). Regardless of feelings among some African governments and citizens, the African Commission on Human and People’s Rights, to which the ASIDS are party, espouses the protection of sexual minority rights (Resolution 275).

Table 7: ASIDS' Commitments to Non-Discrimination

	Regional Treaties/Instruments Signed and Ratified	Domestic Policy Frameworks and Implementation	Pr and DO
Cabo Verde	Banjul Charter	Cabo Verde's constitution prohibits discrimination on certain grounds. However, comprehensive anti-discrimination legislation that covers all the grounds prohibited under the ICCPR, including the protection, and safeguarding of human rights of lesbian, gay, bisexual, and transgender persons, is lacking.	+ -
Comoros	Banjul Charter	Consensual same-sex sexual activity is criminalised through Article 318 of the 1981 Penal Code.	--
Guinea-Bissau	Banjul Charter	Laws no longer criminalize consensual same-sex sexual activity, but antidiscrimination laws do not explicitly extend protections to the LGBTIQ community based on their sexual orientation, gender identity, or sex characteristics. Activist groups such as 'Big Mamas' fight for the rights of LGBTIQ people.	+ -
Mauritius	Banjul Charter	Constitution prohibits discrimination on, inter alia, the ground of caste, colour, creed, sex, and race (Section 16).	++
São Tomé and Príncipe	Banjul Charter	Laws no longer criminalize consensual same-sex sexual activity, but antidiscrimination laws do not explicitly extend protections to the LGBTIQ community based on their sexual orientation, gender identity, or sex characteristics. There are no known LGBTIQ organizations in São Tomé and Príncipe.	+ -

Sources: Human Rights Committee, Cabo Verde (2019, p. 3); US Department of State, Cabo Verde (2019); Committee on Elimination of Discrimination against Women, Seychelles (2019)

The majority of the ASIDS grouping has aligned their legislation in support of this normative regional commitment but practical implementation remains challenging. In Cabo Verde, for example, the United Nations Human Rights Committee (UNHRC) expressed concern that individuals belonging to certain groups continue to face forms of discrimination, in particular, persons living with HIV/AIDS, persons with disabilities, and lesbian, gay, bisexual, and transgender persons (Human Rights Committee, Cabo Verde 2019:3). Despite very few reports of actual discrimination against LGBTQ persons in the Seychelles, activists argue that discrimination and stigma are common especially in interpersonal interactions and on social media with some still refusing to accept changing social and sex roles and diverse sexual minorities (US Department of State, Seychelles, 2019). Some progress has been made by the Seychellois government to allow LGBTQ organizations to join the government's civil society platform and greater efforts have been made to emphasize the human rights of sexual minorities on mass media, through documentaries, live discussion programmes and forums.

The Comoros remains the only ASID where the LGBTQ community is discriminated against in law. Consensual same-sex sexual activity is criminalized through Article 318 of the 1981 Penal Code. Anyone found guilty of committing “improper or unnatural” acts faces a penalty of up to five years’ imprisonment and a fine of 50,000 to one million Comorian francs. In practice, this law is not generally enforced, and no arrests or prosecutions have taken place in years. However, heavy societal pressure and government’s preference for regarding sexual orientation as a “private matter and thus not a priority” has meant that many in the community choose not to publicly reveal their sexual orientation and there are no local LGBTQ organizations (Human Rights Council, 2019; US Department of State, Comoros, 2019).

6 SUMMARIZING KEY FINDINGS

The aim of this article was to answer the question: how normatively coherent are ASIDS with regional civil liberty norms promoted by the AU through the Banjul Charter? It did so by adopting a normative conceptual lens in its outlook and using quality of democracy methodology to compare the quality of selected regional civil liberty norms among ASIDS.

Table 8: Civil Liberties: Regional Normative Commitments Across the ASIDS

	Cabo Verde	Comoros	Guinea-Bissau	Mauritius	São Tomé and Príncipe	Seychelles
	Pr; DO	Pr; DO	Pr; DO	Pr; DO	Pr; DO	Pr; DO
Existence and performance of Human Rights Commissions	+-	+-	+-	++	--	++
Human dignity: Freedom from intimidation and physical violation of the person (torture)	++	+-	+-	++	+-	+-
Freedom of expression	+-	+-	+-	+-	++	+-
Freedom of assembly and association	++	+-	+-	++	+-	+-
Freedom for all to practice their own religion	++	+-	+-	++	+-	+-
Women’s rights and gender equality	+-	+-	+-	+-	+-	+-
Non-Discrimination	+-	--	+-	++	+-	+-
TOTAL Procedure	7/7	6/7	7/7	7/7	6/7	7/7
TOTAL Democratic Outcome	3/7	0/7	0/7	5/7	1/7	1/7

Source: the authors

The following civil right and liberties were compared in terms of how ASIDS align with their normative regional commitment in relation to democratic procedure and outcome: the existence and performance of National Human Rights Institutions (NHRIs); freedom from intimidation and physical violation of the person (torture); freedom of expression;

freedom of assembly and association; freedom for all to practice their own religion; women's rights and gender equality; and freedom from discrimination. The results are compared in Table 8.

From Table 8, it is evident that there is consistency among the ASIDS in their formal commitments to regional civil liberty norms (almost all receive top scores of 6/7 or 7/7) and this is encouraging for regional efforts to promote NCSD. Mauritius is by far the most normatively aligned with regional civil liberty norms (in both procedure and outcome). However, the rest of the ASIDS have been less than successful in implementing these commitments domestically. A possible reason for this difference could simply be that, of the ASIDS, Mauritius has been a democracy the longest and has therefore had the opportunity to confront challenges and revise and refine policy more successfully to improve its democratic health. Nonetheless, these scores seem to contradict small state theory which contends small states illustrate a propensity for normative coherence for development.

7 CONCLUSION

This article finds that cultural context, agency and capacity are vital components in the ability of ASIDS to adhere to their normative commitments to democratic governance. In their study of small state implementation of water norms in Central America, Koff et. al (2020) illustrated how small states formally supported integrated regional norms but undermined them in practice. This article similarly illustrates how ASIDS formally support the Banjul Charter but undermine normative coherence for development domestically. While policy is normatively coherent, substantive implementation is not. Procedurally, all ASIDS are aligned with the Banjul Charter. However, persistent cultural traditions continue to play a role in preventing full realization of rights in practice. Local realities mean that substantive coherence to these norms is often slow or, in some cases, ineffectual. ASIDS are expected to comply with African regional norms, and they do, but predominantly in the formal (procedural) space. Most have difficulty with implementation and, as a result, *de facto* freedoms, experienced by people at grassroots level, are still a challenge. This suggests that political will for NCSD within a region is not enough. A real lack of capacity warrants greater regional support from continental Africa in the form of, among other things, financing, capacity building, expertise, peer review, and monitoring. Two key points emerge: First, only through reinforcement of NCSD can the AU fulfil its rights-based mission via the Banjul Charter; and second, within small state literature, cultural context, agency and capacity are equally as important as size and 'islandness' in determining small island state democratic quality.

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DATA AVAILABILITY STATEMENT

These data were derived from resources available in the public domain (See references for urls).

REFERENCES

- African Development Bank. (2015). Guinea-Bissau: Country Gender Profile. <https://www.afdb.org/en/documents/document/guinea-bissau-country-gender-profile-2015-85067>
- AGDI (African Gender and Development Index). (2018). Mauritius Report. [http://gender.govmu.org/English/Documents/2018/AGDI%20report%20-%20Final%20\(1\)_30032018.pdf](http://gender.govmu.org/English/Documents/2018/AGDI%20report%20-%20Final%20(1)_30032018.pdf)
- Afrobarometer. (2018). AD225: Mauritius strong – but far from perfect – on gender equality and social tolerance. <https://afrobarometer.org/publications/ad225-mauritius-strong-far-perfect-gender-equality-and-social-tolerance>
- AU's Declaration of Principles on Freedom of Expression in Africa (2002). <http://hrlibrary.umn.edu/achpr/expressionfreedomdec.html>
- Cheeseman, N. (2021). Smaller is beautiful: Smaller African states do not necessarily make better democracies. The Africa Report. <https://www.theafricareport.com/98933/smaller-african-states-do-not-necessarily-make-better-democracies/>
- Committee on the Elimination of Discrimination against Women, Seychelles. (2019). In dialogue with Seychelles, Committee on the Elimination of Discrimination against Women urges better funding of gender equality machinery. <https://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=25215&LangID=E>
- Corbett, J., Xu, Y., & Weller, P. (2019). Norm entrepreneurship and diffusion 'from below' in international organisations: How the competent performance of vulnerability generates benefits for small states. *Review of International Studies*, 45(4), 647–668. <https://doi.org/10.1017/S0260210519000068>
- Council on Foreign Relations. (2020). Same-Sex Marriage: Global Comparisons. <https://www.cfr.org/backgrounders/same-sex-marriage-global-comparisons>
- Freedom House. (2020a). Countries and Territories. <https://freedomhouse.org/countries/freedomworld/scores?sort=asc&order=Civil%20Liberties>
- Freedom House. (2020b). <https://freedomhouse.org/country/guinea-bissau/freedom-world/2020>
- Graham, V. (2015). *Pass or fail? Assessing the quality of democracy in South Africa*. P.I.E. Peter Lang.

-
- Graham, S. (2017). Drivers of the foreign policies of southern African small states. *Politikon*, 44(1), 133–155. <https://doi.org/10.1080/02589346.2017.1279802>
- Graham, S., & Graham, V. (2016). The quality of elections in African small island developing states. *Journal of Comparative Politics*, 14(1). <http://www.jofcp.org/>
- Graham, S., & Graham, V. (2019). Quality political participation and the SDGs in African small island developing states, *Regions & Cohesion*, 9(2), 1–30. <https://doi.org/10.3167/reco.2019.090202>
- Guidelines on Freedom of Association and Assembly in Africa. (2017). <https://www.icnl.org/post/tools/guidelines-on-freedom-of-association-and-assembly-in-africa#:~:text=The%20Guidelines%20on%20Freedom%20of,international%20law%20and%20best%20practices.>
- Häbel, S. (2020). Normative policy coherence for development and policy networks: EU networks in Vietnam. *Regions & Cohesion*, 10(1), 1–21. <https://doi.org/10.3167/reco.2020.100102>
- Human Rights Council. (2015). São Tomé and Príncipe: National report submitted in accordance with paragraph 5 of the annex to Human Rights Council resolution 16/21. <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G15/259/10/PDF/G1525910.pdf?OpenElement>
- Human Rights Committee, Mauritius. (2017). Human Rights Committee considers the report of Mauritius. <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=22287&LangID=E>
- Human Rights Committee, Cabo Verde. (2019). Concluding observations on the initial report of Cabo Verde. https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/CPV/CCPR_C_CPV_CO_1_Add-1_38627_E.pdf
- Ingebritsen, C. (2002). Norm Entrepreneurs: Scandinavia's role in world politics. *Cooperation and Conflict*, 37(1), 11–23. <https://doi.org/10.1177/0010836702037001689>
- Iroanya, R., Dzimiri, P., & Phaswana, E. (2018). Human rights-based service delivery: Assessing the role of national human rights institutions in democracy and development in Ghana and Uganda. *Regions & Cohesion*, 8(2), 1–26. <https://doi.org/10.3167/reco.2018.080202>
- Koff, H. (2020). Perpetuating crises at the source?: (Inter)regionalism and normative incoherence for sustainable migration in Africa. *Politikon*, 47(4), 400–421. <https://doi.org/10.1080/02589346.2020.1840026>
- Koff, H., & Maganda, C. (2016). The EU and the human right to water and sanitation: Normative coherence as the key to transformative development. *The European Journal of Development Research*, 28(1), 91–110. <https://doi.org/10.1057/ejdr.2015.77>

-
- Koff, H., Maganda, C., & Kauffer, E. (2020). Transboundary water diplomacy among small states: A giant dilemma for Central American regionalism. *Water International*, 45(4), 275–291. <https://doi.org/10.1080/02508060.2020.1734758>
- Mbanda, V., & Fourie, W. (2019). The 2030 Agenda and coherent national development policy: In dialogue with South African policymakers on Policy Coherence for Sustainable Development. *Sustainable Development*, 28(4), 751–758. <https://doi.org/10.1002/sd.2025>
- Mo Ibrahim Index. (2020). Ibrahim Index of African Governance: Explore the data. <https://iiag.online/>
- National Human Rights Commission Mauritius Annual Report. (2019). <http://nhrc.govmu.org/English/Documents/Annual%20Report/NHRC%20ANNUAL%20REPORT%202019.pdf>
- Neale, K.C. (2020). Global environmental governance and small states: Architectures and Agency in the Caribbean. *Politics and the Life Sciences*, 39(1), 122–124. <https://doi.org/10.1017/pls.2020.2>
- Ninth to Tenth Combined Periodic Report of the Republic of Mauritius on the Implementation of the African Charter on Human and People's Rights. (2019). <https://www.achpr.org/public/Document/file/English/Mauritius%209th-10th%20Combined%20Periodic%20Report%202016-2019.pdf>
- Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment. (2002). https://treaties.un.org/doc/Treaties/2002/12/20021218%2002-38%20AM/Ch_IV_9_bp.pdf
- Report of the Human Rights Promotion Mission to the Republic of Seychelles. (2015). https://www.achpr.org/public/Document/file/English/report_of_achpr_promotion_mission_to_seychelles__6_10_april_2015.pdf
- Sanchez, E.R., Cheeseman, N., Veenendaal, W., & Corbett, J. (2021). African exceptions: democratic development in small island states. *Journal of International Relations and Development*. <https://doi.org/10.1057/s41268-021-00223-1>
- Scobie, M. (2019). *Global environmental governance and small states: architectures and agency in the Caribbean*. Edward Elgar Publishing.
- Sitonen, L. (2017). Regional and sub-regional effects on development policies: The Benelux and the Nordic countries compared. *Regions & Cohesion*, 7(2), 34–69. <https://doi.org/10.3167/reco.2017.070203>
- Srebrnik, H.F. (2004). Small island nations and democratic values. *World Development*, 32(2), 329–341. <http://doi.org/10.1016/j.worlddev.2003.08.005>
- Sutton, P. (2011). The concept of small states in the international political economy. *The Round Table*, 100(413), 141–153. <https://doi.org/10.1080/00358533.2011.565625>
- The African Charter on Human and Peoples' Rights. https://au.int/sites/default/files/treaties/36390-treaty-0011_-_african_charter_on_human_and_peoples_rights_e.pdf

-
- The Commonwealth. (2020). Commonwealth Secretariat welcomes new domestic violence law for Seychelles. <https://thecommonwealth.org/media/news/commonwealth-secretariat-welcomes-new-domestic-violence-law-seychelles>
- Thorhallsson, B. (2018). Studying small states: A review. *Small States & Territories*, 1(1), 17–34. <https://www.um.edu.mt/library/oar/handle/123456789/44443>
- UN Committee on the Rights of the Child. (2019). <http://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2fPPRiCAqhKb7yhslnBTpuuAw%2f%2b74cgBUuvp98ixU1BnIBw2XvKuz%2boZhvpu3frlJYR3qLMOOAJLG%2bHbp8qvThVvhusU7wjqqVZDtjH5qFG7JaN5wIum7H13UJN>
- United Nations Economic Commission for Africa. (2014). Climate change in the African small island developing states: from vulnerability to resilience – the paradox of the small. <http://hdl.handle.net/10855/22515>.
- US Department of State. (2019a). 2019 Report on International Religious Freedom: Cabo Verde. <https://www.state.gov/reports/2019-report-on-international-religious-freedom/cabo-verde/>
- US Department of State. (2019b). 2019 Report on International Religious Freedom: Comoros. <https://www.state.gov/reports/2019-report-on-international-religious-freedom/comoros/>
- US Department of State. (2019c). 2019 Report on International Religious Freedom: Guinea-Bissau. <https://www.state.gov/reports/2019-report-on-international-religious-freedom/guinea-bissau>
- US Department of State. (2019d). 2019 Report on International Religious Freedom: State, São Tomé and Príncipe. <https://www.state.gov/reports/2019-report-on-international-religious-freedom/sao-tome-and-principe/>
- US Department of State. (2019e). 2019 Report on International Religious Freedom: State, Seychelles. <https://www.state.gov/reports/2019-report-on-international-religious-freedom/seychelles/>
- US Department of State. (2019f). 2019 Report on International Religious Freedom: State, Mauritius. <https://www.state.gov/wp-content/uploads/2020/06/MAURITIUS-2019-INTERNATIONAL-RELIGIOUS-FREEDOM-REPORT.pdf>
- US Department of State, Cabo Verde. (2019). Country Reports on Human Rights Practices: Cabo Verde. <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/cabo-verde/>
- US Department of State, Comoros. (2019). Country Reports on Human Rights Practices: Comoros. <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/comoros/>
- US Department of State, Guinea-Bissau. (2019). Country Reports on Human Rights Practices: Guinea-Bissau. <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/guinea-bissau/>

-
- US Department of State, Seychelles. (2019). Country Reports on Human Rights Practices: Seychelles. <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/seychelles/>.
- US Department of State, São Tomé and Príncipe. (2019). Country Reports on Human Rights Practices: São Tomé and Príncipe. <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/sao-tome-and-principe/>
- Uwazuruike, A.R. (2017). An Immanent Critique of the African Human Rights System: Theory, Practice, And Reforms, [Doctoral thesis, University of Central Lancashire].
- Varieties of Democracy. (2019). <https://www.v-dem.net/en/>.
- Veenendaal, W.P., & Corbett, J. (2015). Why small states offer important answers to large questions, *48*(4), 527–549. <https://doi.org/10.1177/0010414014554687>
- Viljoen, F. (2019). Africa’s rights commission can – and should – do more for sexual minorities. <https://theconversation.com/africas-rights-commission-can-and-should-do-more-for-sexual-minorities-116601>
- World Bank. (2019). Comoros – Towards a More United and Prosperous Union of Comoros: Systematic Country Diagnostic (English). <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/354101559590231457/comoros-towards-a-more-united-and-prosperous-union-of-comoros-systematic-country-diagnostic>
- Zupančič, R. (2011). Normative power as a means of a small state in international relations: the role of Slovenia within ‘the EU concert’ of normative power in the Western Balkans. *Lithuanian Foreign Policy Review*, *25*, 56–76.