

## Traditional Forms of Social Protection in Africa: Selected Examples from Ethiopian and Eritrean Societies

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### Abstract

The range of actors involved in providing social protection in Africa is considerably more diverse than is reflected in the current round of policy formulation. Accordingly, a fairly comprehensive view of social protection should be considered. Since scholarly research and institutional stakeholders have been primarily concerned with Western concepts of formal statutory programs, insights to traditional community based forms have been widely neglected on the international agendas of development co-operation. Questions on how people without access to top-down approaches cope with contingencies have to be addressed. Therefore, the discourses' focus has to transcend the apparently ideal typical point of reference for discussing social policies. In respect thereof, the following paper illustrates selected customary mechanisms of social protection in Ethiopia and Eritrea.

### A. Introduction: Social Protection in Africa

In recent years, social protection issues have gained unprecedented momentum in the broader African context. Upon a closer look at initiatives of the African Union (AU),<sup>1</sup> of African national governments and their international donor community,<sup>2</sup> most African countries have either introduced or are considering social protection measures.<sup>3</sup> One of the critical policy questions for long-term strategies seems to be the identification of appropri-

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1 Cf. among others, African Union, Social Policy Framework for Africa (First session of the AU Conference of Ministers in charge of social development, Windhoek, Namibia, 27-31 October 2008), CAMSD/EXP/4(I), Addis Ababa: African Union 2008, p. 17; African Union, Strengthening Social Policy Action towards Social Inclusion (Second Session of the AU Conference of Ministers of Social Development, Khartoum 12-25 November 2010), CAMSD/EXP/3(II), Addis Ababa 2010.

2 See, for example, European Communities, The 2010 European Report on Development, Social Protection for Inclusive Development: A new Perspective in EU-Cooperation with Africa, Robert Schuman Centre for Advanced Studies, European University Institute, San Domenico di Fiesole 2010, pp. 2f.

3 Stephen Devereux / Melese Getu, The Conceptualisation and Status of Informal and Formal Social Protection in Sub-Saharan Africa, in: Stephen Devereux / Melese Getu (eds.), Informal and Formal Social Protection in Sub-Saharan Africa, Kampala 2013, p. 1.

ate roles for state action versus community-based social security concepts.<sup>4</sup> Here, the European welfare state seems to provide the ideal typical point of reference for discussing social policies.<sup>5</sup> Accordingly, social protection has mostly been defined in terms of the specific instruments of public intervention that have been important in the historical build-up of the Western welfare states.<sup>6</sup>

## B. Critical Reflection on Social Protection Policies in Africa

In critical reflection, a “transplant” of European social protection/security policies should, however, be evaluated cautiously. Because of the very different political, economic and social contexts, the Western social security approach is not altogether useful when devising appropriate social protection programmes within developing countries.<sup>7</sup> Among other issues, difficulties result from a high proportion of rural inhabitants – not only – but in particular on the African continent. Subsistence farmers usually do not earn a stable monetary income, but mainly focus on self-sufficient food production for their families. These groups rely on mutual self-help initiatives of village community or extended families.<sup>8</sup> Naturally, the realization that macro-economic measures alone do not automatically lead to a trickle-down of economic and social development, but instead contribute to rising poverty rates, challenge the welfare-state-concepts of social policy and social security.<sup>9</sup> In a development context and, once again, especially in the African context, it is therefore more appropriate to take a fairly comprehensive view of social protection.<sup>10</sup> An essential factor is, generally

- 4 Joachim von Braun, *Social Security in Sub-Saharan Africa: Reflections on Policy Challenges*, in: Ehtisam Ahmad / Jean Drèze/ John Hills / Amartya Sen (eds.), *Social Security in Developing Countries*, Oxford / New York 1991, p. 395-414 (on p. 396).
- 5 See, among others, Dunja Zwanecki, *Social Security Arrangements in sub-Saharan Africa* (Kölner Schriften zur Sozial- und Wirtschaftspolitik, Bd. 42), Regensburg 2001, p. 4; Adriette Hendrina Dekker, *Informal Social Security: A Legal Analysis* (unpublished doctoral thesis at the University of South Africa), Kapstadt 2005, pp. 2-5.
- 6 Rika Verpoorten / Gert Verschraegen, *Formal and informal social protection in sub-Saharan Africa: A complex welfare mix to achieve poverty and inequality reduction*, Working Paper University Leuven 2008, p. 3.
- 7 Ahmad, Ehtisham, Drèze, Jean, Hills, John and Sen, Amartya (eds.). *Social Security in Developing Countries* Oxford 1991; Gough, Ian and Wood, Geof (eds.), *Insecurity and Welfare Regimes in Asia, Africa and Latin America. Social Policy in Development Contexts*. Cambridge: University Press 2004.
- 8 Dunja Zwanecki, *Social Security Arrangements in sub-Saharan Africa* (Kölner Schriften zur Sozial- und Wirtschaftspolitik, Bd. 42), Regensburg 2001, p. 23; Pierre Mouton / J.V. Gruat, *Die Erstreckung der sozialen Sicherheit auf selbständige Erwerbstätigkeit in Afrika*, in: 41 *Internationale Revue für Soziale Sicherheit* 1 (1988), pp. 45-62.
- 9 Barbara A. Rohregger, *Shifting Boundaries: Social Security in the Urban Fringe of Lilongwe City, Malawi*, Aachen 2006, p. 10.
- 10 Rika Verpoorten / Gert Verschraegen, *Formal and informal social protection in sub-Saharan Africa: A complex welfare mix to achieve poverty and inequality reduction*, Working Paper University Leuven 2008, p. 3.

speaking, the perception that Sub-Saharan Africa is ‘poor’ in state institutions, but ‘rich’ in community institutions for social-security approaches. These are not confined to rural areas but reach out into peri-urban and urban areas as well, partly by maintained urban-rural linkages.<sup>11</sup> Account should be taken of the fact that “transplanted” European social security systems mostly have a risk-based approach covering risks typically found in developed countries. It is not suitable to simply apply it unmodified, in Sub-Saharan Africa’s developing countries with usually a large number of people living in rural areas, working in an informal sector, and with the extent of poverty that prevails in the countries. In addition, the traditional European social security model (used to) assume(s) the existence of a nuclear family, *i.e.* a family headed by a male breadwinner with one wife and children. This concept of the nuclear family does not accurately reflect the family context in most areas of the African continent.<sup>12</sup> In South Africa, for example, the number of households headed by women is increasing, the extended family continues to play a substantial role, and, especially with the increasing number of adults dying of HIV/AIDS, households headed by children are becoming a reality. The boundaries of the family, and even the direct household, has to be seen in its fluid nature. The household is in many cases larger than the biological core family. Extended family members, such as unmarried siblings or nieces and nephews, the families of brothers and sisters and one’s aged parents, usually make up an integral part of a household. Sometimes, a household may also include family members who are no longer present; or, at least not on a permanent basis, but who are part of a household for whom support is budgeted, such as married children living in close spatial proximity. Additionally, the shifting size of households is another aspect that contradicts the modernist nuclear family model.<sup>13</sup> A household, a family and its different degrees of kinship as socio-economic units are playing a much more important role, since they regulate access to productive and reproductive resources. Moreover, in the traditional European social security model, social assistance is seen as a temporary aid for assisting people until they gain formal employment and receive social insurance protection.<sup>14</sup> In effect, some of the labour force in African set-

11 Joachim von Braun, *Social Security in Sub-Saharan Africa: Reflections on Policy Challenges*, in: Ehtisam Ahmad / Jean Drèze/ John Hills / Amartya Sen (eds.), *Social Security in Developing Countries*, Oxford / New York 1991, p. 395-414 (on p. 404); James Clyde Mitchell, *Cities, Society and Social Perception: A Central African Perspective*, Oxford 1987.

12 Deborah Kasente, *Gender and Social Security Reform in Africa*, in: 53 *International Social Security Review* 3 (2000), pp. 27-41 (on p. 30); Barbara A. Rohregger, *Shifting Boundaries: Social Security in the Urban Fringe of Lilongwe City, Malawi*, Aachen 2006, p. 143; Ambe J. Njoh, *Culture, Tradition and Development in Africa: Historical Lessons for Modern Development Planning*, Aldershot / Burlington 2006, pp. 51ff.

13 Barbara A. Rohregger, *Shifting Boundaries: Social Security in the Urban Fringe of Lilongwe City, Malawi*, Aachen 2006, p. 143.

14 Wouter van Ginneken, *Overcoming Social Exclusion*, in: Wouter van Ginneken (ed.), *Social Security for the Excluded Majority – Case Studies for Developing Countries* Geneva 1999, p. 3.

tings, namely the unemployed, the self-employed, the informally employed *etc.* are then being excluded from the protection and its benefits.<sup>15</sup>

When this is taken into consideration, family or community mutual support and solidarity concepts, often with pre-colonial roots, remain important for welfare and, by design or by default, are frequently interlinked with government efforts to reduce poverty or vulnerability.<sup>16</sup> Each of them, the community-based and state based social-security concepts, has their strengths and weaknesses,<sup>17</sup> and should be assessed in the context of a specific local or regional setting. A narrow focus on Western constructs of social security systems would therefore be inappropriate to any account of social protection, particularly in several communities on the African continent where mutual support has been a central pillar of community life for centuries.<sup>18</sup>

### C. Views on Traditional Forms of Social Protection in Africa

Accordingly, the organizers' concept note of the Joint Conference on *Law for Development: Strengthening Social Protection Systems in Africa*, held at the German Federal Ministry for Economic Cooperation and Development (*Bundesministerium für Wirtschaftliche Zusammenarbeit und Entwicklung*) in Berlin (Germany) on the 10<sup>th</sup> and 11<sup>th</sup> November 2016, emphasize that

*“traditional forms of social protection may become the predominant regulating normative tool for providing social services, where state agencies are not or marginally present on the ground. Social protection in Africa should therefore not only look at approaches of the state, but also customary systems.”*

This paper, presented at the aforementioned conference as well as at the Max Planck Institute for Social Law and Social Policy (*Max-Planck-Institut für Sozialrecht und Sozialpolitik*) in Munich (Germany) on the 13<sup>th</sup> April 2017, picks up the latter. It will illustrate selected customary mechanisms of social protection, or, more precisely, forms of social security, of people known through classical historical literature as “Abyssinians” or (in the languages

15 Adriette Hendrina Dekker, *Informal Social Security: A Legal Analysis* (unpublished doctoral thesis at the University of South Africa), Kapstadt 2005, pp. 3f. and p. 72.

16 European Communities, *The 2010 European Report on Development, Social Protection for Inclusive Development: A new Perspective in EU-Cooperation with Africa*, Robert Schuman Centre for Advanced Studies, European University Institute, San Domenico di Fiesole 2010, p. 73.

17 Joachim von Braun, *Social Security in Sub-Saharan Africa: Reflections on Policy Challenges*, in: Ehtisam Ahmad / Jean Drèze/ John Hills / Amartya Sen (eds.), *Social Security in Developing Countries*, Oxford / New York 1991, p. 395-414 (on p. 410).

18 William Ahadzie / Francie Lund / Stephen Devereux / Ian Macauslan, *Social Protection in Africa* (Workshop Paper published by the Institute of Development Studies, Sussex), Brighton 2006, p. 1.

of origin) *Habäša* or *Abäša*.<sup>19</sup> Although those mechanisms and even terms can, in reality also be identified in other communities of the region, the unbiased focus of the paper lies in the Amhara and *Təgrāñña* people<sup>20</sup> and their communities on the highland plateaus.<sup>21</sup> In this context, the overall objective of the paper is to describe traditional mutual aid associations including the rotating saving and credit associations (*Roscas*)<sup>22</sup>, similar to other concepts in the regional cultural setting such as *gama tya* (جمعة)<sup>23</sup> in Egypt and Sudan, but also to some extent to *Roscas* in West Africa such as *susu*<sup>24</sup> in Ghana, *esusu*<sup>25</sup> or *ato* in

- 19 See, among others, Yohannēs Gäbrä-Ēgzi’abəher, መዝገበ-ቃላት ትግርኛ-አምራርኛ, Asmara 1948/1949; Tākästä Tākälä et al. መዝገበ ቃላት ትግርኛ ብትግርኛ ed. by የኢትዮጵያ ቋንቋታት አካዳሚ, Addis Ababa 1989, p. 76; Tākko’ä Täsfay, ዘመናዊ መዝገበ ቃላት ትግርኛ, Asmara 1999, ሐበሻ, p. 77; Ludolf Hiob: *Historia Aethiopica*, Frankfurt a.M. 1681, ch. 1,1,1; Moreover, Rainer Voigt, Abyssinia, in: Siegbert Uhlig (ed.), *Encyclopaedia Aethiopica*, Vol. 1 (A-C), Wiesbaden 2003, pp. 59-65.
- 20 William A. Shack, *The Central Ethiopians: Amhara, Tigriña and related People (Ethnographic Survey of Africa ed. by Daryll Forde, Part IV: North-Eastern Africa)*, London 1974, p. 15-50; Wolbert Smidt, *The Term Habäša: An Ancient Ethnonym of the „Abyssinian“ Highlanders and its Interpretations and Connotations*, in: Hatem Elliesie (ed.), *Multidisciplinary Views on the Horn of Africa: Festschrift in Honour of Rainer Voigt’s 70<sup>th</sup> Birthday*, Cologne 2014, pp. 37-69; Donald N. Levine, Amhara, in: Siegbert Uhlig (ed.), *Encyclopaedia Aethiopica*, Vol. 1 (A-C), Wiesbaden 2003, pp. 230-232; Wolbert Smidt, *Təgrāñña*, in: Siegbert Uhlig / Alessandro Bausi (ed.), *Encyclopaedia Aethiopica*, Vol. 4 (O-X), Wiesbaden 2010, pp. 908-911.
- 21 In detail (also on the topic of customary law in the region), cf. Hatem Elliesie, *Der zweite Band der Encyclopaedia Aethiopica im Vergleich*, in: 102 *Orientalistische Literaturzeitung (OLZ)* 4-5 (2007), pp. 397-407 (on p. 399f.).
- 22 *Nota bene*: The definition of the term with an in-cash overemphasize in some of the relevant literature tend to be oblivious to their history and delivers the false impression that these entities exists to do no more than provide a source of credit and an avenue for saving to their members. Largely, evolved in pre-colonial *époque*, contributions of the in-kind genre stands behind the logic of saving and credit associations, since *Roscas* encompass the provisioning of additional services to their members.
- 23 See Heike Roggenthin, „Frauenwelt“ in Damaskus: Institutionalisierte Frauenräume in der geschlechter- getrennten Gesellschaft Syriens, Münster 2002, p. 86f.
- 24 Cf. Sena A. Gabianu, *The Susu Credit System: An Ingenious Way of Financing Business Outside of the Formal Banking System*, in: *The Long-Term Perspective Study of Sub-Saharan Africa*, Volume 2: Economic and Sectoral Policy Issues, Worldbank: Washington D.C. 1990, pp. 122-128; Ferdinand D. Tay, *Sparen, Investition und finanzielle Intermediation im Kontext der Untereentwicklung: Zum Problem der Institutionalisierung der Kapitalbildung in Entwicklungsländern*, dargestellt am Beispiel Ghanas, Institut für Entwicklungsforschung und Entwicklungspolitik der Ruhr-Universität Bochum: Bochum 1990, p. 345; Goski Alabi / Joshua Alabi / Stephen Tei Akrobo, *The Role of “Susu” A Traditional Informal Banking System in the Development of Micro and Small Scale Enterprises (MSEs) in Ghana*, in: *International Business & Economics Research Journal*, Volume 6, Number 12 (December 2007), pp. 99-115.
- 25 Likewise in Trinidad and the Bahama’s *esu*.

Nigeria,<sup>26</sup> *osusu* in Sierra Leone, *tontines*<sup>27</sup> in Senegal, *njanges*<sup>28</sup> in Cameroon, *temo ikelemba* of the Democratic Republic of the Congo,<sup>29</sup> *chilemba* or *chiperegani* in Malawi,<sup>30</sup> and *upatu* or *mchezo* in Tanzania.<sup>31</sup>

### *I. Selected Forms of Customary Social Security in Ethiopia and Eritrea*

Despite their important role in social and economic life especially for the majority of people in Eritrea and Ethiopia living in rural areas, often quite far away from banks, relatively little attention has been given to it.<sup>32</sup> There are different types of such kind of associations which represent traditional cooperatives, savings and credit as well as insurance institutions. In the following, the paper will illustrate the three prominent ones, namely (1) እድር *addər*, (2) ስቁብ *'əqqub* and (3) ማኅበር *mahbär*.

26 Anthony Nwabughuogu, The "Isusu": An Institution for capital formation among the Ngwa Ibo; its Origins and Development to 1951, in: 54 *Africa: Journal of the International African Institute* 4 (1984), pp. 46-58.

27 See Michel Lelart, L'épargne informelle en Afrique: les tontines béninoises, in: 30 *Revue tiers monde* 118 (1989), pp. 271-298; Bruno Bekolo-Ebe, Le système des tontines: liquidité, intermédiation et comportement d'épargne, 99 *Revue d'économie politique* 4 (1989), pp. 616-638; Philippe Callier, *Informal Finance: The Rotating Saving and Credit Association: An Interpretation*, in: 43 *Kyklos: International Review for Social Sciences*, Fasc. 2 (May 1990), pp. 273-276; Bernd Balkenhol / E H Gueye, Tontines and the Banking System: Is there a Case for Building Linkages (Poverty-Oriented Banking (INT/92/M01/FRG), No. 2), International Labour Office, Enterprise and Cooperative Development Department, Geneva 1994; Dunja Zwanecki, Social Security Arrangements in sub-Saharan Africa (Kölner Schriften zur Sozial- und Wirtschaftspolitik, Bd. 42), Regensburg 2001, p. 142-143.

28 Cf. Ben Rogaly, *Microfinance and Poverty Reduction*, Oxford 1997, p. 23; Steven Haggblade, *Africanization from Below: the Evolution of Cameroonian Savings Societies into Western-Style Banks*, in: *Rural Africana: Current Research in the Social Sciences* (1978), n.s., 2. pp. 35-55.

29 Jean Marc Dutrénit, *Sociologie et compréhension du travail social*, Toulouse 1980, p. 23; Victor Gerdes, *Precursors of Modern Social Security in Indigenous African Institutions*, in: 13 *Journal of Modern African Studies* (1975), pp. 209-228 (on p. 211).

30 Cf. Marcel van der Linden, *Workers of the World: Eine Globalgeschichte der Arbeit*, Frankfurt a.M. 2017, p. 116 (esp. footnote 19).

31 Timothy Besley / Stephen Coate / Glenn Loury, The Economics of Rotating Savings and Credit Associations, in: *The American Economic Review*, Volume 83, Number 4 (September 1993), pp. 792-810; Ambe J. Njoh, *Culture, Tradition and Development in Africa: Historical Lessons for Modern Development Planning*, Aldershot / Burlington 2006, p. 131; Kwabena Nyarko Otoo & Clara Osei-Boateng, *Social Protection Schemes in Africa*, in: Trywell Kalusopa / Rudi Dicks / Clara Osei-Boateng (eds.), *Social Protection Schemes in Africa*, Accra n.d., p. 17; Temesgen Teshome, *Role and Potential of 'Iqqub' in Ethiopia* [unpublished thesis for the degree of Masters in Science in Accounting and Finance at Addis Ababa University], Addis Ababa 2008, p. 1.

32 Girma Begashaw, The Economic Role of Traditional Savings and Credit Institutions in Ethiopia / Le rôle économique des institutions traditionnelles d'épargne et de crédit en Ethiopie, in: 2 *Savings and Development* 4 (1978), pp. 249-264 (on p. 249).

## 1) አድር

*Iddar* is a term referring to associations of mutual help. Even though there are similar association elsewhere on the African Continent such as the aforementioned, *addar* is considered to be of indigenous origin.<sup>33</sup> Tracing the precise origins of *addar* has, however, remained controversial.<sup>34</sup> In this regard, many of the literatures on *addar* claim that it started as an ethnic-based association and was later transformed into a multi-ethnic association with various forms due to both internal and external factors. Some give emphasis to the external factor by stating that both the imperial and the *Därg*<sup>35</sup> governments discouraged – and in certain cases even forced – ethnic-based *addars* to change their names and reconsider their membership. Others put emphasis on the fluid nature of *addars* which they consider a quality that has made them adaptable to the multi-ethnic context of the urban setting in which multiethnic based membership was a natural result.<sup>36</sup> Alemayehu, however, asserts that *addars* started as neighbourhood associations and, later on, formed into “occupation and tribal” *addars*.<sup>37</sup>

Regardless of its very local provenance, originally *addar* was established to provide mutual aid in burial matters and also for other community based concerns.<sup>38</sup> In the context of urban migration *addar* developed into a voluntary multifunctional institution of self-help

- 33 Alula Pankhurst, The Role and Space of Iddirs to Participate in the Development of Ethiopia, in: Alula Pankhurst (ed.), *Iddirs: Participation and Development*. Proceedings of the Ethiopian National Conference, 20-21 December 2001, Addis Ababa 2003, pp. 2-41; Yenehun Taye Engida, The Role of Iddirs for Family Welfare at Kebele 02, Dire Dawa City Administration, Ethiopia, in: 4 The International Journal of Humanities & Social Studies 6 (2016), pp. 143-152 (on p. 144).
- 34 Dejene Aredo, The *iddir*: An Informal Insurance Arrangement in Ethiopia, in: *Savings and Development* Volume 34 (2010), No. 1, pp. 53-72 (on p. 58).
- 35 The Provisional Military Administrative Council (Amharic: ጊዜያዊ፣ ወታደራዊ፣ አስተዳደር፣ ደርግ, *gizeyawi wätaderawi astädadär därg*) was Ethiopia’s ruling body between 1974 and 1987.
- 36 Cf. Fecadu Gedamum, Urbanisation, Polyethnic Group Voluntary Associations and National Integration in Ethiopia, in: 1 Ethiopian Journal of Development Research 1 (1974), pp. 71-79; Alula Pankhurst / Damen Haile Mariam, The Iddir in Ethiopia: Historical Development, Social Function, and Potential Role in HIV/AIDS Prevention and Control, in: 7 Northeast African Studies 2 (2000), pp. 35-58; Shiferaw Tesfaye Mengesha, The Role of Civil Society Organization in Poverty Alleviation, Sustainable Development and Change [unpublished thesis for the degree of Masters in Social Anthropology at Addis Ababa University], Addis Ababa 2002; Solomon Dejene, Exploring *iddir*: Toward developing a Contextual Theology in Ethiopia, in: Svein Ege / Harald Aspen / Birhanu Teferra and Shiferaw Bekele, Proceedings of the 16th International Conference of Ethiopian Studies, Vol. 2, Trondheim 2009, p. 538.
- 37 Alemayehu Seifu, Iddir in Addis Ababa: A Sociological Study, in: 12 Ethiopia Observer 1 (1968), pp. 8-33.
- 38 Yenehun Taye Engida, The Role of Iddirs for Family Welfare at Kebele 02, Dire Dawa City Administration, Ethiopia, in: 4 The International Journal of Humanities & Social Studies 6 (2016), p. 144.

and solidarity.<sup>39</sup> It is the most widespread association in Ethiopia<sup>40</sup> but its compositions, procedures, approaches and sizes may differ from place to place.

In the rural areas the following three aspects should be considered:

- (1) that written by-laws are not very common,
- (2) that the size of the contributions and collection (compensation) are relatively small
- (3) that they rarely have links with the formal sectors (particularly banks).<sup>41</sup>

In the urban areas, *addars* serve different purposes such as insurance-type, recreation or community development. For example, in Addis Ababa, where there are at least ten types of *addars*,<sup>42</sup> community-based *addars* are registered in accordance to written regulations at the relevant government department from which they receive certificates entitling them to rights of legal personalities. Being more precise, *addars* are usually registered at city or sub-city level administration in Addis Ababa and at municipalities in regional and zonal level. The license is not given at federal level. By implication, there are no federal laws existing on which claims may legally be enforced. Here, criteria to register in *addar* associations are

- signed minutes of the founders,
- memorandum of association and
- photos of three elected representatives as chairman secretary and treasurer.

In addition, there is a requirement that *addar* associations adhere and submit

- an annual plan,
- an activity report and

39 Richard Pankhurt / Endrias Eshete, Self-Help in Ethiopia, in 2 Ethiopian Observer 1 (1958), p. 358; Thomas Killion, Workers, Capital and the State in the Ethiopian Region: 1919-1974, PhD thesis, Stanford University 1985, pp. 145ff.; Fekadu Gedamu, Urban Polyethnic Group Association and National Integration, Addis Ababa 1993; Dirk Bustorf / Charles G. H. Schneider, *Eddar*, in: Siegbert Uhlig, *Encyclopaedia Aethiopia*, Vol. 2 (D-Ha), Wiesbaden 2005, pp. 225-227 (on p. 225).

40 According to Gebreyesus Abegaz Yimer / Gebrehiwot Hadush Abera / Mehreteab Ghebremeskel Ghebre-gergis / Gidey Halibo Seyoum / Wim Decock, Customary Laws Regulating Traditional Financial Institutions in Tigray Regional State (Ethiopia): A Brief Introduction to Eqqub and Iddir [Paper presented on a joint project meeting of the School of Law at Mekelle University (Ethiopia) and the Faculty of Law at the Catholic University Leuven (Belgium) at Axum Hotel Mekelle on 15-16 September 2014], p. 4, “empirical research have confirmed that more than 90% of the population of Ethiopia belong to at least one [*addar*]”.

41 Dejene Aredo, The *iddir*: An Informal Insurance Arrangement in Ethiopia, in: Savings and Development Volume 34 (2010), No. 1, pp. 53-72 (on p. 62).

42 Cf. Dejene Aredo, 2002, NGOs and Self-Help Organizations in Addis Ababa: The Case of *Iddir*, in: Agedew Redie / Isabel Hinrichsen / Yirga Gabre Direta (eds.), Self-help Initiatives in Ethiopia: Prospects and Challenges (Proceedings of the Conference on Self-help Initiatives in Ethiopia, held at the ERCTC, Addis Ababa, May 14 and 15, 2001 [GTZ-Open Self-help Project], Addis Ababa 2002).

- an audited financial reports annually.<sup>43</sup>

It appears that the number and types of *addars* increase with demographic shifts from rural to (peri-) urban areas. Similarly, the number of *addar* per person or per household increase with the degree of urbanization.

All over, it can be said that nowadays *addars* are community oriented and mostly religiously and ethnically heterogeneous unless the vicinity is homogenous.<sup>44</sup> They are based more on vicinity than kinship and the number of members can vary from 100 to more than 1,000 people. Every (full) member<sup>45</sup> has to pay either a certain amount of money monthly or annually or contributes on special calls to be made to the *addar*. In the case of death, sickness, house-fires, accidents and other kinds of misfortune, an *addar* provides money, predominately for the support of those facing a problem or hardship. In defined cases such as death of a member, an extra fee is collected from all members for the arrangement of the funeral. In addition to these payments, all members are expected to attend the burial.<sup>46</sup> These days, some *addar* even use their accumulated money for social service and self-development activities like road construction, the establishment of new schools and clinics that serve the communities in rural areas. As a matter of fact, some *addars* have started to do business by renting its properties to non-members or to those members who are not entitled to use the property.<sup>47</sup> Here, community *addars* are often linked to the formal sector with function to deposit members' funds in banks.<sup>48</sup>

43 Mekibib Teshome, The Role of Self-help Groups in enhancing Urban Livelihood Assets: A Case of Lideta-Kirkos Sub-Cities' Self-help Groups [unpublished master thesis in Public Management and Policy with a specialization in Development Management at the School of Graduate Studies at Addis Ababa University], Addis Ababa (December) 2016, p. 33.

44 Solomon Dejene, Exploring *iddir*: Toward developing a Contextual Theology in Ethiopia, in: Svein Ege / Harald Aspen / Birhanu Teferra and Shiferaw Bekele, Proceedings of the 16th International Conference of Ethiopian Studies, Vol. 2, Trondheim 2009, pp. 535-547 (on p. 535).

45 Originally full membership was limited to men, wives being only indirect members. In kin-based *addar*, one reason for this was that the wives, due to exogamy, were considered external to the group. Today, some changes can be observed in the position of women: In many *addar* they form their own sub-committees for addressing their own issues, but also those on behalf of the whole *addar* by organizing food for events, for example.

46 Girma Begashaw, The Economic Role of Traditional Savings and Credit Institutions in Ethiopia / Le rôle économique des institutions traditionnelles d'épargne et de crédit en Ethiopie, in: 2 Savings and Development 4 (1978), pp. 249ff.; Dirk Bustorf / Charles G. H. Schneider, *Addar*, in: Siegbert Uhlig (ed.), Encyclopaedia Aethiopia, Vol. 2 (D-Ha), Wiesbaden 2005, p. 225.

47 Gebreyesus Abegaz Yimer / Gebrehiwot Hadush Abera / Mehreteab Ghebremeskel Ghebre-gergis / Gidey Halibo Seyoum / Wim Decock, Customary Laws Regulating Traditional Financial Institutions in Tigray Regional State (Ethiopia): A Brief Introduction to Eqqub and Iddir [Paper presented on a joint project meeting of the School of Law at Mekelle University (Ethiopia) and the Faculty of Law at the Catholic University Leuven (Belgium) at Axum Hotel Mekelle on 15-16 September 2014], p. 5.

48 Dejene Aredo, The *iddir*: An Informal Insurance Arrangement in Ethiopia, in: Savings and Development, Volume 34 (2010), No. 1, pp. 53-72 (on p. 64).

After what has been illustrated before, *addar* provides multidimensional support for its members which is not purely “in-cash” but also “in-kind” and socio-psychological assistance.<sup>49</sup> The concept of assisting members encountering hardship became what was tantamount to insurance companies covering such items as medical expenses, loss of property and short term disabilities. It is therefore considered by some authors being an “informal insurance system” that functions based on risk pooling and risk sharing mechanisms.<sup>50</sup> Virtually, this applies to the (peri-) urban environment of *addar*’s imitation of formal insurance sector services. For instance, the “Ethiopian Teachers Association Iddir”<sup>51</sup> and one run by employees of the Telecommunication Authority have accrued significant capital reserves and have bridged the gap between the banking system and financial transactions that take place beyond the functional scope of various countries’ banking and other financial sector regulation, the so called “formal” and “informal” sectors in two ways: First, by offering insurance-company-type services and second, by depositing their capital in the National Bank. In the case of the “Telecommunication Authority Iddir” that amounted to more than 12 million *Bərr*,<sup>52</sup> thus tying the two sectors together.<sup>53</sup>

## 2) ዕቁብ

Since *addar* co-exists with other forms of mutual support networks,<sup>54</sup> one should look at ‘*əqqub*,<sup>55</sup> a popular traditional credit association, which is widely spread in Ethiopia and Eritrea, mainly in the urban, and to a certain extent, in the rural areas. ‘*əqqub* has perhaps

49 Cf. footnote 22 of this article.

50 Gebreyesus Abegaz Yimer / Gebrehiwot Hadush Abera / Mehreteab Ghebremeskel Ghebregergis / Gidey Halibo Seyoum / Wim Decock, Customary Laws Regulating Traditional Financial Institutions in Tigray Regional State (Ethiopia): A Brief Introduction to Eqqub and Iddir [Paper presented on a joint project meeting of the School of Law at Mekelle University (Ethiopia) and the Faculty of Law at the Catholic University Leuven (Belgium) at Axum Hotel Mekelle on 15-16 September 2014], p. 4.

51 Dejene Aredo, *The iddir: An Informal Insurance Arrangement in Ethiopia*, in: *Savings and Development*, Volume 34 (2010), No. 1, pp. 53-72; Susan Johnson / Ben Rogaly, *Microfinance and Poverty Reduction*, Oxford 1997, p. 23.

52 The word ብር, originally for silver in Amharic, became the official designation of Ethiopia’s currency after the revolution of 1974 and has continued so to be present.

53 Tirfe Mammo, *The Paradox of Africa’s Poverty: the Role of Indigenous Knowledge, Traditional Practices and Local Institutions – the Case of Ethiopia*, Lawrenceville 1999, pp. 193-194; Dirk Bustorf / Charles G. H. Schneider, *Āddər*, in: Siegbert Uhlig (ed.), *Encyclopaedia Aethiopica*, Vol. 2 (D-Ha), Wiesbaden 2005, pp. 225-227 (on p. 226).

54 Dejene Aredo, *The iddir: An Informal Insurance Arrangement in Ethiopia*, in: *Savings and Development*, Volume 34 (2010), No. 1, pp. 53-72 (on p. 58).

55 Victor Gerdes, *Precursors of Modern Social Security in Indigenous African Institutions*, in: 13 *Journal of Modern African Studies* (1975), pp. 209-228 (on p. 214).

evolved over centuries out of ancient customary institutions,<sup>56</sup> although some writers<sup>57</sup> attempted to trace its origins to the period of the Italian occupation, 1936-41. Moreover, it is possible that 'əqqub pre-dates the emergence of the modern banking system in the countries. It most likely started with the Gurage people, who have had a long practice of collecting money from villagers in order to aid a person in time of need. The recipient then either returns the money at a later date, or gives assistance to another in distress. This practice, it is believed, led to the development of the 'əqqub.<sup>58</sup> It evolved from a trust-based union of acquaintances into large associations that mobilize considerable financial resources. Although the proliferation of 'əqqub has made it difficult to generalize the institution, inherent values and procedure have prevailed. Correspondingly, it earmarks a strong social and economic value since it brings people of common interest together for the main purpose of saving money.<sup>59</sup> 'Əqqub is usually administered by a secretary person and payments are made to a chairperson, both elected from the members due to their high integrity, commanding respect and trust of all members whereas the chairperson is considered to be the most respected individual in the neighbourhood; often an elderly person with a high social and economic status.<sup>60</sup> The basic principle upon which 'əqqub is organized is that a fixed amount of money is collected from each participant. This fund is, afterwards, given to one of the participants in turn. In its simplest form 'əqqub consists of a certain number of individuals (shares) usually 12, 26 or 52, depending on whether the contribution is made monthly, bi-weekly or weekly.<sup>61</sup> These numbers represent 'effective shares' in the sense that if two people want to participate in 'əqqub but cannot individually afford to contribute a full share, each contributes a certain fraction of the share.<sup>62</sup> For example, one could contribute  $\frac{1}{3}$  of a share while the other contributes  $\frac{2}{3}$ , or any other combination. Accordingly, more than two people are able to create an 'effective share'. As a result, the actual number of people in an

56 E.g. community-level labour exchange arrangements.

57 Such as Richard Pankhurt / Endrias Eshete, *Self-Help in Ethiopia*, in 2 *Ethiopian Observer* 1 (1958), p. 355-356; Jean Comhaire, *Wage Pooling as a form of Voluntary Association in Ethiopian and other African Towns*, in: *Proceedings of the Third International Conference of Ethiopian Studies*, Addis Ababa 1966.

58 Victor Gerdes, *Precursors of Modern Social Security in Indigenous African Institutions*, in: 13 *Journal of Modern African Studies* (1975), pp. 209-228 (on p. 213).

59 Charles G. H. Schneider / Amsalu Aklili, 'Əqqub, in: Siegbert Uhlig, *Encyclopaedia Aethiopica*, Vol. 2 (D-Ha), Wiesbaden 2005, pp. 346-347 (on p. 346).

60 Charles G. H. Schneider / Amsalu Aklili, 'Əqqub, in: Siegbert Uhlig, *Encyclopaedia Aethiopica*, Vol. 2 (D-Ha), Wiesbaden 2005, pp. 346.

61 Cf. Donald N. Levine, *Wax and Gold: Tradition and Innovation in Ethiopian Culture*, Chicago 1972, p. 278; Dejene Aredo, *The Informal and the Semi-Formal Financial Sectors in Ethiopia: A Study of the Iqqub, Iddir, and Savings and Credit Co-Operatives* [Research Paper 21, African Research Consortium / Consortium pour la recherche économique en Afrique], Nairobi (December) 1993, p. 18.

62 Girma Begashaw, *The Economic Role of Traditional Savings and Credit Institutions in Ethiopia / Le rôle économique des institutions traditionnelles d'épargne et de crédit en Ethiopie*, in: 2 *Savings and Development* 4 (1978), pp. 249-264 (on p. 253f.).

'*aqqub* is not limited to 12, 26 or 52. This allows an '*aqqub* to be made up by people from different income classes.

To give you a simple example, let us think of a hypothetical ideal '*aqqub* which consist of 12 participants (shares). We further assume, for simplicity, that all the participants have the same intensity of demand for the fund; thus, the person who is the luckiest gets the first fund and the process of drawing lots goes on until the end of a year. Suppose the fixed amount of contribution by each member per month is 10 Euro. The total fund is then 120 Euro (10 Euro x 12 people). The participant who wins the first fund receives 120 Euro including her/his contribution. In effect she/he is borrowing 110 Euro from the rest of the group at zero nominal interest rate<sup>63</sup>. The first month she/he receives 110 Euro, during the second month the first winner contributes 10 Euro to the next fund, and is left with 100 Euro for that period. In the third month the first winner will have a 90 Euro-month, after contributing 10 Euro to the third fund. The first winner's net fund use becomes zero only during the 12<sup>th</sup> months. In the first month the fund use of the second winner is 10 Euro whereas in the second month it is 100 Euro. This is because during the first month the second winner contributes 10 Euro whereas in the second month the total contribution to the fund is 20 Euro and, thus, subtracting this amount from 120 Euro gives us 100 Euro. In the third month, the net fund use of the second winner reduces to 90 since 10 Euro must be contributed to the fund by the third winner. Accordingly, each month as the second winner contributes 10 Euro to the funds to be given to subsequent winners, his net fund use reduces and it becomes zero during the twelfth month.<sup>64</sup>

The essential principle involved here is therefore the rotating access to a continually re-constituted fund. The person who receives the fund first becomes a debtor to all members, while the person who receives it last is a creditor to the rest until the last contribution is made. The person who receives the fund at a particular meeting is determined by drawing a lot. The drawing of the lot, however, may not coincide with the credit needs of the members. In order to channel the funds to the person who needs the credit, various alternative approaches may be employed:

- (1) One is that the needy member approaches the group through the chairperson before the lot is drawn explaining his/her problems. If the group agrees, this person gets the fund.
- (2) The second alternative is that the lot is drawn to determine the entitled person. If the winner of the fund doesn't have a pressing need for the fund, the persons with credit needs approaches the winner. The winner decides who gets the fund depending on the

63 Putting aside a deeper economic perspective, namely, if inflation is considered, the real estate rate may be negative.

64 Cf. Table 1 and its description in Girma Begashaw, *The Economic Role of Traditional Savings and Credit Institutions in Ethiopia / Le rôle économique des institutions traditionnelles d'épargne et de crédit en Ethiopie*, in: 2 *Savings and Development* 4 (1978), on p. 257, adapted from Douglas G. Norvell / James S. Wehrby, *A Rotating Credit Association in the Dominican Republic*, in: 9 *Caribbean Studies* 1 (April 1969), pp. 45-52.

monetary return offered by the needy member or some other social factors such as personal relationships.

A monetary reward to the winner is, however, becoming more common in (peri-)urban areas and towns,<sup>65</sup> whereas the non-economic criteria are commonly used in rural areas. The 'əqqub continues until each member has been a winner, and then a fresh start is often made. However, an 'əqqub may also last indefinitely, with no person being able to win a second time until each has done so once. Membership will remain the same throughout the 'əqqub, unless a participant is unable to pay the full agreed contribution each period, in which case additional or replacement member(s) may be admitted. In case of death, the deceased's heirs, usually his wife or children, may continue in the 'əqqub.<sup>66</sup>

### 3) ግጥር

Just as in the aforementioned two generally described mechanisms *mahbär* is a term nowadays referring to a wide range of arrangements, depending on the specific context. There are often overlaps with the already mentioned institutions. Thus, a clear and general definition in contemporary Eritrea and Ethiopia is hard to establish. The Orthodox Christian *Mahbär*'s original purpose was to collect money to host feasts on church saints' days. Membership was restricted to the Orthodox Christians and specific *mahbär* were formed by people who felt an affinity to a particular saint. Members would meet on the saint's day, which was once a month, in the house of each member in turn. The host member provides a meal. The organization provides mediation and all members must help each other on any hardship, such as assisting to rebuild a house destroyed by fire, assist a widow etc.<sup>67</sup> Generally speaking, those self-help church associations are not savings organizations in the strict sense of the word, as money is not put aside for future use. Rather, it is the relationships which are cultivated in the *mahbär* that provide for the smoother functioning of rotating saving and credit associations.<sup>68</sup>

65 Gebreyesus Abegaz Yimer / Gebrehiwot Hadush Abera / Mehreteab Ghebremeskel Ghebre-gergis / Gidey Halibo Seyoum / Wim Decock, Customary Laws Regulating Traditional Financial Institutions in Tigray Regional State (Ethiopia): A Brief Introduction to Eqqub and Iddir [Paper presented on a joint project meeting of the School of Law at Mekelle University (Ethiopia) and the Faculty of Law at the Catholic University Leuven (Belgium) at Axum Hotel Mekelle on 15-16 September 2014], p. 7.

66 Victor Gerdes, Precursors of Modern Social Security in Indigenous African Institutions, in: 13 Journal of Modern African Studies (1975), pp. 209-228 (on p. 214).

67 Stéphane Ancel, Mahbär et sänbäte: associations religieuses en Ethiopie, in: 8 Aethiopia: International Journal for Ethiopian and Eritrean Studies (2005), pp. 95-111; Charles Schaefer, Mahbär, in: Siegbert Uhlig (ed.), Encyclopaedia Aethiopia, Volume 3 (He-N), pp. 649-650.

68 Girma Begashaw, The Economic Role of Traditional Savings and Credit Institutions in Ethiopia / Le rôle économique des institutions traditionnelles d'épargne et de crédit en Ethiopie, in: 2 Savings and Development 4 (1978), on p. 252.

## II. Review on ኢ.ድ.ር, ዕቁብ and ማኅበር

To sum it up, self-help associations such as *əddər* and *‘əqqub*, often also labelled with the term *mahbär*, are flourishing in both countries as social and economic institutions. Despite the changes in social, economic and legal frameworks, *‘əqqub* is expanding and attracting more people from diversified social groups and the amount of capital they transact is significant. Nowadays *‘əqqub* span the social ladder from poor shoeshine boys to wealthy import-exporters.<sup>69</sup> *‘Əqqub* have been recognized as viable capital-generating mechanisms by both the governments and NGOs. It can be stated that *‘əqqub* did not reduce its importance in the informal financial sector in times of growth of the modern financial sector. It is beyond doubt that especially *‘əqqub* now serves as the engine of small and medium scale business activity in most of the cities.

The expansive nature of the informal financial institutions has started to be an element of friction with the governments. Such tension exists, so far, when the institutions administer large amounts of capital or have a large number of members. However, countermeasures have been sporadic and were not based on fully-fledged studies on the adverse effects of any of the institutions, which institutions are involved in illegal activities or against the interest of the ruling regime and to what extent is yet to be researched. Despite all these controversies and lack of clarity on the future of these “informal” financial institutions, they are trying to catch up with the changing internal and external factors. The fact that they have hitherto survived these changes provides *prima facie* evidence that they are successfully evolving into directions that enable them to address these changes adequately. However, it will not be possible to make definitive conclusions until further research has clarified their evolving nature.

The amount of capital accumulated by some *‘əqqubs* has brought along with it some issues of concern. Legal security is the main one. What security does the *‘əqqub* give to its members that a member who has won a lottery will continue to pay his contributions? The fact that in the traditional arrangements, the members know each other at work or in other fields of life was by itself assurance enough that everyone would get what he/she is entitled to. In fact, one advantage of these institutions has been that they help uphold the societal values of honesty and integrity. However, with the diversity of members and increment of capital, these values may not warrant adequate security. There is still a claim that such values work in addressing the issue.<sup>70</sup> For example, many large *‘əqqubs* transpose the check laws provided in the commercial laws into an effective security system in governing the in-

69 Charles G. H. Schneider / Amsalu Aklili, *‘Əqqub*, in: Siegbert Uhlig, *Encyclopaedia Aethiopia*, Vol. 2 (D-Ha), Wiesbaden 2005, pp. 346.

70 Gebreyesus Abegaz Yimer / Gebrehiwot Hadush Abera / Mehreteab Ghebremeskel Ghebregergis / Gidey Halibo Seyoum / Wim Decock, *Customary Laws Regulating Traditional Financial Institutions in Tigray Regional State (Ethiopia): A Brief Introduction to Equb and Iddir* [Paper presented on a joint project meeting of the School of Law at Mekelle University (Ethiopia) and the Faculty of Law at the Catholic University Leuven (Belgium) at Axum Hotel Mekelle on 15-16 September 2014], p. 9.

formal 'əqqub system. This means a member who wins the lottery shall give a valid check with value that equals the money he won in the 'əqqub as a condition to be paid by the 'əqqub leader.<sup>71</sup> Therefore, in case the member fails to pay as he is required they would collect the money from his/her bank or if he/she does not have sufficient balance in his/her account they would easily force the member to immediately pay the unpaid money under the threat that they would report to police for giving a check with insufficient funds<sup>72</sup> which is a crime under the state laws in both countries.<sup>73</sup>

Having said that, there are indices stating that courts provide judicial recognition for certain constellations of 'əqqubs and they force the defaulter to pay back the 'əqqub money she/he has taken. Empirical data collected from more than 30 court decisions from Təgray state in northern Ethiopia revealed that 'əqqub money is increasingly enforceable at court.<sup>74</sup> With regard to using the formal laws in the informal context, a good example is the fact that the intention of the laws that criminalizes the drawing of a check without sufficient funds is different from the purpose for which 'əqqub leaders use a check, namely as a bank guarantee paper. There are some court cases that show the difficulties that emanate from the use of checks by 'əqqub leaders.<sup>75</sup> Hence, I would like to bring to your attention, especially from a policy point of view final aspects on the subject: When 'əqqubs become more complex and institutionalized there are some pertinent legal issues that need to be answered:

- Are 'əqqubs required to be registered?
- Are they legal persons?
- If not, how do they conduct activities such as depositing money in banks, bringing actions in courts?

71 Gebreyesus Abegaz Yimer / Gebrehiwot Hadush Abera / Mehreteab Ghebremeskel Ghebregergis / Gidey Halibo Seyoum / Wim Decock, Customary Laws Regulating Traditional Financial Institutions in Tigray Regional State (Ethiopia): A Brief Introduction to Eqqub and Iddir [Paper presented on a joint project meeting of the School of Law at Mekelle University (Ethiopia) and the Faculty of Law at the Catholic University Leuven (Belgium) at Axum Hotel Mekelle on 15-16 September 2014], p. 6f. (footnote 16) and p. 9.

72 Temesgen Teshome, Role and Potential of 'Iqqub' in Ethiopia [unpublished thesis for the degree of Masters in Science in Accounting and Finance at Addis Ababa University], Addis Ababa 2008, p. 54.

73 **ገበየሁ ሕገ ሃገረ-ኤርትራ** (Penal Code of the State of Eritrea), Asmara 2015, Art. 349; **የኢትዮጵያ ፌዴራላዊ ዲሞክራሲያዊ ሪፐብሊክ የወንጀል ሕግ** (The Criminal Code of the Federal Democratic Republic of Ethiopia), Federal Nāgarit Gazeta, Proclamation No. 414/2004 / Addis Abāba **፲፱፻፺፯ ዓ.ም.** (9 May 2005), Art. 693.

74 Cf., inter alia, Court of Cassation, Dässalāw Fanta *versus* Mulugeta Dässalāw and Ayyälä Däbāla, cassation file number 46019.

75 See Haḡos Kaḡsay *versus* Gäbrä-Şadəq Näḡaš, Qādamay Wäyyanā Court, File number 16474.

#### **D. Conclusion**

When dealing with social protection in Sub Saharan Africa, a very important policy challenge remains to design programmes that are complementary. In many countries where social protection programmes have been implemented, they are often fragmented at the institutional, sectoral and programme levels. Several implementing agents, even in the same ministry, deliver programmes in isolation. A fertilizer support programme implemented by the ministry of agriculture may have nothing to do with a micro-finance programme implemented by the ministry for social development, or a school-feeding programme implemented by donors. This scenario often leads to duplication or inefficient use of efforts. A more integrated approach would require that a fertilizer subsidy be delivered together with extension services, basic skills training, access to markets and credit where possible. Policy-makers must begin to move away from trying to replicate the European models of social security. There is certainly no problem in learning from what others have been doing, but the ‘cut and paste’ approach can actually do more harm. Apart from the prohibitive cost implications, social protection models from developed countries require sufficient records, administrative capacity and particular socioeconomic conditions, which may not exist in many countries in Sub-Saharan Africa. Developing policy and instruments based on the local conditions will not only result in effective interventions, but will also enhance the unlocking of the much needed local creativity in dealing with complex issues of risks and vulnerability.<sup>76</sup> Equally there might be inherent strength in prevailing modes and systems that need only to be reinforced, which will likely be accepted on taken on with much more ease due to its familiarity.

76 Horman Chitonge, *Social Protection Challenges in Sub-Saharan Africa: ‘Rethinking Regimes and Commitments*, in: *71 African Studies* 3 (2012), pp. 323-346 (on p. 342); European Communities, *The 2010 European Report on Development, Social Protection for Inclusive Development: A new Perspective in EU-Cooperation with Africa*, Robert Schuman Centre for Advanced Studies, European University Institute, San Domenico di Fiesole 2010, p. 19.