

Article

The Critical Need for Land Reform in Relation to the Development of Inclusive Citizenship in South Africa

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Introduction

The advent of political democracy in South Africa must be applauded as a tremendous achievement for the nation. Centuries of racial oppression under slavery, colonialism and apartheid ended when full citizenship and equal rights were extended to previously excluded 'African', 'Coloured', and 'Indian' South Africans,¹ effectively a transition from an exclusionary to an inclusionary citizenship. The Founding Provisions in the opening chapter of South Africa's 1996 Constitution express commitment to the values of 'human dignity, the achievement of equality and the advancement of human rights and freedoms' as well as, inter alia, 'non-racialism and non-sexism' and 'a multi-party system of democratic government'.² The Constitution's Bill of Rights is considered a consummate expression of inclusive citizenship. The document formally grants an array of civil, political, and social rights to all South African citizens, as well as inclusively affording non-citizens entitlement to basic human rights, including adequate housing, access to health care, sufficient food and water, and social security.³ At the time, the nation's post-apartheid and democratic transition was regarded as a beacon of hope to other struggles for justice, freedom and peace.

However, despite the 1996 Bill of Rights' exemplary articulation of an inclusive citizenship, post-apartheid South Africa remains a country characterised by deepening inequality, widespread poverty, violent crime and social unrest. Economic and social inequality entrenched by the country's racialised history continues to divide the rich from the poor. According to an annual report released by the South African government's National Planning Commission, in 2009 the Gini coefficient used to measure inequality was calculated at 0.679 on a scale of 0-1, with 1 being absolute economic inequality, giving South Africa the dubious distinction of having the most unequal economy in the world.⁴ As of 2009, 65 percent of South Africa's population subsisted beneath a poverty line of R551.78 per capita per month, while a quarter of South Africans survived on less than R149.08 per person, per month.⁵ The combined problems of HIV/AIDS, corrupt bureaucracy, the slow pace of land redistribution and widespread poverty linked to high unemployment frustrate efforts by citizens to access the social rights to which they are entitled. The momentous 1994 transformation that extended political equality and citizenship to all South Africans has not resulted in an extension of socio-economic equality.

In post-apartheid South Africa, the 'land question'—rooted in a long history of colonial conquest and dispossession—remains a major challenge for the achievement of a just and equitable society with inclusive social and economic

citizenship. Relatively recent land occupations in neighbouring Zimbabwe in the early 2000s have struck fear into the hearts of many white farmers who remain in the region.⁶ These events have contributed to intensified anxiety surrounding discussions of land reform in South Africa, so much that arguments for widespread land redistribution are dismissed. In the South African context, legacies of dispossession and economic marginalisation of rural Africans under apartheid and colonialism have created severe challenges to, and dilemmas of, the development of inclusive citizenship. While post-apartheid legislation and government policy has been—in theory—committed to an ambitious process of land reparation and land reform, the actual outcomes in practice have been frustratingly ineffective and limited.⁷

My study entailed a literature-based investigation of prospects for, and dilemmas of, the development of inclusive citizenship within the context of post-apartheid South Africa, in light of the reality of socio-economic inequality. For the purposes of this paper, I will focus particularly on the problem of land reform and its relation to the development of inclusive citizenship in post-apartheid South Africa. I have three objectives: (1) to briefly introduce the concept of citizenship and the notion of inclusive citizenship; (2) to explore the legacy of unequal land distribution as one of many historical developments that particularly complicate or obstruct the development of inclusive citizenship in post-apartheid South Africa; and (3) to suggest possible ways forward towards equitable land distribution and inclusive citizenship.

What is citizenship?

Citizenship is about the recognition of civic status, assertion of rights, and entitlement to access scarce public resources. The concept involves both the entitlements conferred by, and the obligations inherent in, membership of a specific political community. In the Lockean liberal conception of citizenship, civil and political rights are associated with membership of the political community in relation to the state, while economic and social rights relate to civil society. During the rise of democratic welfare states in the early 20th century, British sociologist T.H. Marshall articulated the seminal notion of *social citizenship* and its associated social rights, which entail the right to a 'minimum provision of welfare' and may include rights to education, housing, food and water, etc.⁸ Marshall's concept of social citizenship suggested that a level of socio-economic provision fell within the domain of the state and that socio-economic rights *ought* to be a necessary component of citizenship in a democratic society.⁹ The aim was not to achieve *equality of income*, but rather an *equality of status* as citizens characterised by 'a general enrichment of the concrete substance of civilised life' and 'a general reduction of risk and insecurity'.¹⁰ By mitigating the debilitating effects of poverty and inequality, citizens would be enabled to participate more fully in democratic politics.

Marshall's argument for social citizenship centred on his belief that welfare provision was essential to citizenship in the modern democratic state. At the time of Marshall's writing, the economic philosophy of Keynesianism lent support to the creation of welfare programmes and the expansion of social citizenship. The

Keynesian theory held that an active government fiscal policy could solve economic problems in the short run without harming the long run economy.¹¹ However, following a post-World War II period of economic expansion, severe economic crises in the 1970s provoked re-evaluation of Keynes's ideas in favour of a conservative free market approach.¹² Championed by Washington-based think tanks and global financial institutions, 'neo-liberal' policy recommendations brought about the 'restructuring and retrenching of social programmes' and a rollback of state provisions for social citizenship.¹³

Contemporary discourses of citizenship

In recent years, in an effort to counter the marginalisation and social exclusion experienced by numbers of citizens in modern liberal democratic states, contemporary discourses have engaged with two distinct, alternative conceptions of citizenship. The first alternative approach focuses primarily on the vertical relationship between civil society and the state. *Active citizenship* 'moves beyond formal citizenship to a substantive one that concerns an array of civil, political social and economic rights...'¹⁴ This response calls for an active citizenry, engaged in political participation – such as protest, petitioning and lobbying – with the ultimate aim of shaping their economic, political and social environment.¹⁵ *Insurgent citizenship* is a strategic approach utilised by citizens and civil society organisations to demand access to their social rights. For example, in South Africa, citizens involved in the Western Cape Anti-eviction Campaign (AEC) resist evictions in assertion of their constitutional right to housing.¹⁶ Through community discussions, peaceful protest, sit-ins and other grassroots activities, the AEC has successfully resisted evictions and service disconnections.¹⁷

The second alternative approach focuses on the horizontal aspect of citizenship. This response challenges the traditional state-centred approach to citizenship and advocates a broader society-centred approach to citizenship.¹⁸ *Horizontal citizenship* emphasises 'that the relationship *between* citizens is at least as important as the more traditional 'vertical' view of citizenship between the state and the individual'.¹⁹ Whereas previously citizenship status in the nation-state primarily determined inclusion and/or exclusion of citizens, horizontal citizenship suggests that membership of an array of social communities may be the appropriate means for achieving authentic inclusion. The Abahlali baseMjondolo (AbM) movement in Durban is one expression of horizontal citizenship. The chairperson S'bu Zikode describes AbM as a 'non-political social movement'.²⁰ The movement unites 14 informal settlements whose leaders meet weekly. Each individual settlement gathers once a week and all members vote on decisions affecting the community.²¹ In line with the Hobbesian version of the social contract, the movement emphasises the horizontal relationship *between* citizens, rather than the vertical relationship of individual citizens with the state. This dimension of citizenship is particularly important when the government is largely unresponsive to the needs of impoverished and marginalised citizens.²² Thus, organisations such as AbM have an important role in the development of a more inclusive society.

The concept of *inclusive citizenship* takes the importance of horizontal relationships between citizens a step further and aims to understand the meaning of citizenship 'from the perspective of the excluded' due to poverty and other forms of marginalisation.²³ This conception of citizenship is thus concerned with grassroots meanings of citizenship expressed by individuals and local communities. The values of inclusive citizenship are, inter alia, justice, recognition, self-determination and solidarity.²⁴ The development of inclusive citizenship thus requires a correction of past injustices; the recognition of members of oppressed classes as fully human individuals; provision for a degree of self-determination for individual citizens (e.g. access to land, rights of property, rights of political participation, access to resources such as education and health care); and the allowance of space for collective self-determination and solidarity among the oppressed.²⁵

The 'land question' in South Africa

The 'land question' in South Africa stems from a history of conquest and dispossession of indigenous lands at the hands of European settlers.²⁶ Following the 1913 Natives Land Act, black South Africans were effectively restricted from land ownership outside designated ethnic 'homelands'.²⁷ Land allocated to black South Africans under the Land Act amounted to a mere 7.13% of the land.²⁸ In relation to citizenship the significance of the Land Act was that it established the notion that, for Africans, the rights and obligations of citizenship were to be based in 'ethnic homelands'. Colonial land policy thus provided the foundation for the post-1948 apartheid policy of 'separate development' of Africans in designated homelands also referred to as 'Bantustans'.²⁹ In 1970, the Bantu Homelands Citizenship Act effectively revoked black South African citizenship by transferring it to the ten separate Bantustans, which served as labour pools for the migrant labour system. Though theoretically autonomous, in practice the homelands were completely dependent on economic and fiscal support from the South African state. In relation to agriculture, the effect of the apartheid 'separate development' policy was to create a fortified, white-dominated commercial sector and an extremely neglected black 'subsistence' sector.³⁰ The Homelands Citizenship Act remained in effect until 1986, when citizenship rights began to be reinstated for some black South Africans. In the early 1980s, the increasing failure of the apartheid state to enforce the pass laws and the removal of squatter settlements signaled the impending repeal of the pass laws and abolition of influx control.³¹ In terms of citizenship, this constituted a successful assertion by black South Africans of their rights to freedom of movement and access to land.

In the 1990s, the emergence of a 'new' and democratic South Africa involved a period of transition characterised by intense political struggle, widespread political violence and a set of difficult compromises. Developing a new Constitution and Bill of Rights proved particularly challenging, especially in relation to economic provisions. In particular, the clause relating to private property rights was highly contentious and continues to be disputed as to its effects on much-needed land reform. While the African National Congress (ANC) insisted that constitutional provisions for property 'should not impede

legislative programmes addressing the massive disparities of wealth in society', the National Party (NP) aimed to protect existing property rights, in particular the rights of white South African farmers to their land.³² The final property clause in Section 25 of the 1996 Constitution makes the provision that "no law may permit arbitrary deprivation of property," although property may be expropriated 'for a public purpose or in the public interest' providing that compensation is agreed upon by affected parties.³³ By requiring compensatory payment for transactions related to land restitution, the property clause effectively limits the means of property expropriation.³⁴ In practice, this has resulted in land restitution programmes based on a 'willing buyer, willing seller' policy, which has been criticised for artificially inflating land prices in situations where the seller is reluctant to sell.³⁵

Post-apartheid land reform has been slow to bring about more equitable land distribution. The original target to transfer 30% of agricultural land to black farmers by 1999 has been pushed back several years to 2014.³⁶ At the end of September 2009, only 6.9% of agricultural land had been transferred to black beneficiaries, who were often unable to use the land due to lack of infrastructure and support.³⁷ The reasons for the slow pace of land transfer include lack of funds to purchase land, a lack of capacity to disburse available funds as well as declining budgets for operational costs including salaries of those employed to disburse the funds.³⁸ Even if the target of 30% is reached within the proposed timeframe—an impossibility given the current pace of redistribution—the fact remains that a higher percentage of land in South Africa—closer to 80%—needs to be transferred to black South Africans for purposes of justice and equity. "Until landholding is more evenly distributed between black and white in proportion to their numbers in the population at large, this fundamental injustice will remain alive."³⁹ The correction of past injustices through land redistribution is required for the development of inclusive citizenship in South Africa.

The process of land reform has been complicated by the challenging context of the South African agricultural industry. Frequently the basic objective of land reparation has been linked to the objective of profitable commercial farming within the context of the capitalist economy rather than restoring land to communities for their own customary uses.⁴⁰ Following the post-apartheid liberalisation of trade, commercial farming in South Africa became increasingly destabilised by market forces, with the result of extensive job losses and increasing casualisation of labour.⁴¹ Both permanent and casual farm labourers were subject to displacement—particularly through eviction from farms—as farmers shifted from traditional paternalist models to free market capitalism. Despite these negative consequences, rural labour has remained politically quiescent. Lack of rural civil society organisations (CSOs) hinders the ability of the majority of farm labourers to actively organise themselves to influence critical policy decisions related to agriculture and land restitution. "CSOs with land and agriculture amongst their priorities are overwhelmingly products either of the activities of donor-funded non-governmental organisations or the government itself."⁴² There are few spaces for active citizenship in regard to policy decisions in the sphere of rural development and land reform, which tends

to be influenced heavily by agribusiness. In general, rural development programmes have maintained structures that disseminate power and wealth between a small elite. Thus, land reform processes and rural development programmes in their current form constitute a serious impediment to the development of inclusive citizenship.

Ways forward towards equitable land distribution and the development of inclusive citizenship

Certainly, increasing the pace and extent of land transfer is an integral part of achieving a more equal distribution of land among citizens. The question of exactly how to redistribute the land has been at the centre of public discourse in recent months. At a conference in early 2011, African National Congress Youth League (ANCYL) President Julius Malema declared that the time for economic transformation in South Africa had come and suggested that black South Africans ‘must take land without payment’ in a call to end the ‘willing buyer, willing seller’ approach.⁴³ Malema’s statement provoked a flurry of responses from agricultural organisations, including Agri SA, the Transvaal Agricultural Union (TAU), and the African Farmers’ Association of South Africa (Afasa). While most agricultural bodies acknowledged that land reform has been widely unsuccessful, the organisations did not support expropriation without compensation for a variety of reasons, including its affect on foreign investor confidence, perceived ‘unfairness’ to land owners, consequences for food safety and the ubiquitous worry that South Africa is ‘going down the same path [as] Zimbabwe.’⁴⁴ These statements express the underlying fears of existing landowners and farmers that emerge in discussions around land redistribution and reform.

Though arguments against land expropriation are dominant in the mainstream media, a number of academics, non-governmental organisations and community organisations support the general principle of land transfer without compensation as a necessary measure to achieve a just and equitable South Africa.⁴⁵ In a recent editorial, academic and political researcher Xolela Mangcu argues that land redistribution with a focus on small-scale farming has resulted in more productive use of agricultural land in a number of cases.⁴⁶ “Evidence from around the world showed that when there was equitable provision of infrastructure and inputs, small-scale farmers performed better than large-scale farmers.”⁴⁷ Mangcu suggests a three-pronged strategy to facilitate and increase the pace of land transfer from white South Africans to black South Africans:

- 1) Continue to allow land transfer via the ‘willing buyer, willing seller’ approach in instances where the funds are available;
- 2) Consider expropriation with compensation for farms with less-than-optimal productivity;
- 3) Consider expropriation without compensation in circumstances when farms are being ‘underutilised ... for hedging or speculative reasons.’⁴⁸

Mangcu’s suggestions have the potential to speed up the process of land redistribution, which addresses one problem related to land reform. Furthermore,

the success of land redistribution is closely linked to the ability of beneficiaries to use the land in ways that meet their needs. Stephen Greenberg, a researcher who specialises in land, agriculture and rural development, argues for creative thinking around land use.⁴⁹ One suggestion refers to the development of smallholder agriculture, similar to what Mangcu advocates, as a means to reach greater numbers of beneficiaries. Greenberg suggests that rather than focusing on the transfer of large farms to private individual owners, these farms could be broken down to allow more people to benefit.⁵⁰ Another suggestion relates to the use of funds. Currently a significant portion of government funds allocated for land reform are earmarked for purchasing property through the 'willing buyer, willing seller' approach. Instead, upon improving the land transfer policy by allowing some expropriation with minimal or no compensation, government funds could be diverted 'to provide practical and material support to those getting land through the reform programme.'⁵¹ Thirdly, the 'productive use of land' must incorporate the concept of 'food sovereignty', which calls for 'the priority of local agricultural production to feed people locally' among other rights-based claims related to food and agriculture.⁵² The primary concerns of agriculture must include food production and food security of the local population, with agricultural exports as an additional means to income generation.

The realisation of an inclusive approach to land reform requires mobilisation and organisation of the rural population. This includes both addressing the vertical relationship between individual citizens and the state, as well as horizontal relationships *between* citizens. Methods of active citizenship must be employed to exert political pressure on the government to speed up the pace of land transfer and implement creative and ecologically sustainable approaches to land use, such as smallholder farming. Community-based forums must allow for discussion and communal decision-making in regards to land and rural development issues. The Anti-Eviction Campaign and Abahlali baseMjondolo may be considered as potential models of activism structures, although these movements operate primarily in urban areas. The challenge will be to unite citizens in rural areas. To date, South African civil society has been largely unsuccessful in mobilising the rural population to effect change on issues of land reform. In 2004, the South African Communist Party (SACP) proposed strategies for land and agrarian reform that included 'mass-based people's land committees' as well as 'land forums that include women, the landless and farm workers.'⁵³ However, more than five years on, the SACP has not succeeded in effectively organising rural South Africans. The mobilisation and organisation of the rural population thus remains a serious hindrance to effective, inclusive land reform processes.

Conclusion

The 'land question' is one of many dilemmas that have yet to be resolved to the detriment of multitudes of South African citizens. Land restitution has been slow and rural development programmes have in general been exclusionary. Land reform has the potential to uphold the values of inclusive citizenship: justice, recognition, self-determination and solidarity. Equal access to land and basic

agricultural support will provide previously oppressed South Africans with a degree of self-determination, a place to live and the potential for smallholder farming as a means of subsistence and employment. An inclusive land reform process requires an innovative approach that simultaneously increases the pace and extent of land transfer, while ensuring that beneficiaries are able to use the land in ways that meet their needs. A few possible ways forward include an emphasis on the development of smallholder agriculture, provision of practical agricultural support and a prioritisation of food production to feed the local population. The realisation of land reform requires civil society involvement. Rural populations must be mobilised and organised through the creation of community forums and spaces for democratic exchange. This constitutes the greatest challenge in achieving effective, inclusive land reform. Until the 'land question' is addressed in a just and equitable matter the development of inclusive citizenship in South Africa remains highly improbable.

Notes

¹ Racial terminology and classifications during the colonial and apartheid period in South Africa were variable and contested, which complicates the writing of an historical account. My aim is to conceptualise 'race' as a social construct emerging from political discourses of power. There is a complex history of terminology in itself as well as a critical need to recognise the nuances between the ascriptive and official classifications and the political self-identification of individuals and communities. For the purposes of this paper, I will use the term 'white' to identify South Africans who were classified as such under apartheid and the term 'black' when referencing South Africans given the classifications of 'African', 'Asian/'Indian', and 'Coloured' under apartheid legislation. (The choice to utilise the term 'black' as an inclusive reference to 'Africans', 'Coloureds', and 'Asians' is associated with the Black Consciousness Movement from the mid-1970s.) In addition, I have put several terms in quotation marks at first use in an effort to indicate the derogative use of language to ascribe identity and maintain categories of difference during the apartheid and colonial eras. I am aware of the tension between re-inscribing racial categories and acknowledging the inequalities that persist beneath the categories.

² Government of South Africa, *Constitution of the Republic of South Africa, Act no. 108 of 1996* (1996) s1.

³ *Constitution* s26-27.

⁴ Government of South Africa, *Development Indicators*, (Minister in the Presidency: National Planning Commission, 2010); p. 25. Available online: <http://www.thepresidency.gov.za/pebble.asp?relid=2876>.

⁵ *Development Indicators* (2010); p. 26.

⁶ Sara Berry, 'Debating the Land Question in Africa,' *Comparative Studies in Society and History*, 44 (2002) pp. 638-668.

⁷ Stephen Greenberg, 'Status report on land and agricultural policy in South Africa,' (PLAAS: Institute for Poverty, Land and Agrarian Studies - University of the Western Cape, 2010).

⁸ Thomas Marshall & Tom Bottomore, *Citizenship and Social Class and other essays*, (London: Pluto Press, 1992) pp. 5-48.

⁹ D.S. King & Jeremy Waldron, 'Citizenship, Social Citizenship and the Defense of Welfare Provision,' *British Journal of Political Science*, 18 (1988) pp. 422.

¹⁰ Marshall & Bottomore (1992) pp. 33.

¹¹ Siravn Karimi, 'Liberal Democracy, Citizenship and Class: Unresolved Contradictions of Capitalism,' *International Journal of Criminology and Sociological Theory*, 2 (2009) p. 270.

¹² This approach is often called *neo-liberal* for its revival of classical liberal ideals, though the term itself has acquired a pejorative meaning. In general, citizenship in the liberal tradition is concerned primarily with the role of civil liberties and political rights associated with membership of the nation-state. Within both the classical liberal and neo-liberal paradigms, the social and economic provisions inherent in social citizenship fall within the domain of civil society.

¹³ Karimi (2009); p 274.

¹⁴ Faranak Miraftab & Shana Wills, 'Insurgency and Spaces of Active Citizenship: The Story of the Western Cape Anti-eviction Campaign in South Africa,' *Journal of Planning Education and Research*, 25 (2005); p. 201.

¹⁵ Andrea Cornwall and Vera Schattan P. Coelho (eds), *Spaces for Change? The politics of participation in new democratic arenas*, (London: Zed Books, 2007); p. 2.

- ¹⁶ Miraftab & Wills (2005); p. 201.
- ¹⁷ Miraftab & Wills (2005); p. 207.
- ¹⁸ Naila Kabeer, 'IDS Working Paper 171: Citizenship and the boundaries of the acknowledged community: identity, affiliation and exclusion,' *Development Research Centre on Citizenship, Participation and Accountability*, (Sussex: Institute of Development Studies, 2002) p. 2.
- ¹⁹ Naila Kabeer, *Inclusive Citizenship: Meanings and Expressions*, (New York: Zed Books, 2005)p. 23.
- ²⁰ S'bu Zikode, 'We are the Third Force,' (Abahlali baseMjondolo, 2006) para. 14. Available online: <http://www.abahlali.org/node/17>.
- ²¹ Zikode (2006) para, p. 11.
- ²² Kabeer (2005),p. 23.
- ²³ Kabeer (2005) p. 1.
- ²⁴ Kabeer (2005)p. 3-6.
- ²⁵ Kabeer (2005) p.3-6.
- ²⁶ André Du Toit & Hermann Giliomee, *Afrikaner Political Thought: Analysis & Documents, Volume 1: 1780-1850*, (Cape Town: David Philip, 1983). And P.J. Van der Merwe, *The Migrant Farmer in the History of the Cape Colony, 1657-1842*, (Athens: Ohio University Press, 1995).
- ²⁷ Sol Plaatje, *Native Life in South Africa*, (Northlands: Picador Africa, 2007)p. 21.
- ²⁸ Mahmood Mamdani, *Citizen and Subject: Contemporary Africa and the Legacy of Late Colonialism*, (Princeton: Princeton University Press, 1996)p. 143.
- ²⁹ Cameron & Spies (eds), *An Illustrated History of South Africa*, (Johannesburg: Jonathan Ball Publishers, 1991)p. 235.
- ³⁰ Stephen Greenberg, 'Land reform and transition in South Africa, *Transformation* 52 (2003) 43.
- ³¹ Cameron & Spies (1991) p. 319.
- ³² Matthew Chaskalson, 'Stumbling Towards Section 28: Negotiations over the protection of property rights in the interim Constitution,' *South African Journal on Human Rights (SAJHR)* 11 (1995) 223-224.
- ³³ *Constitution* s25.
- ³⁴ Cyril Ramaphosa, 'Negotiating a New Nation: Reflections on the Development of South Africa's Constitution,' in Andrews, P. & Ellmann, S. (eds), *Post-Apartheid Constitutions: Perspectives on South Africa's Basic Law*, (Johannesburg: Witwatersrand University Press & Athens: Ohio University Press, 2001) 83.
- ³⁵ Greenberg (2010) p. 4.
- ³⁶ Greenberg (2010)p. 4.
- ³⁷ Greenberg (2010) p. 4.
- ³⁸ Greenberg (2010) p. 5.
- ³⁹ Greenberg (2010) p. 6.
- ⁴⁰ Greenberg (2010) p. 1.
- ⁴¹ Greenberg (2010) p. 16.
- ⁴² Greenberg (2010)p. 16.
- ⁴³ Fienie Grobler, 'Anger at Malema's 'insane' land-grab comments,' *Mail & Guardian Online* 20 June (2011) para. 2.
- ⁴⁴ Fienie Grobler (2011) pp. 19-20.
- ⁴⁵ Stephen Greenberg, 'Land Nationalisation,' *Sacsis: The South African Civil Society Information Service* 5 July 2011: para. 25. Available online: <http://sacsis.org.za/site/article/702.1>.
- ⁴⁶ Xolela Mangcu, 'No easy answers to land reform questions,' *BusinessDay* 12 July 2011: para. 2-3.
- ⁴⁷ Mangcu (2011) para. 3.
- ⁴⁸ Mangcu (2011) para. 9.
- ⁴⁹ Greenberg (2011).
- ⁵⁰ Greenberg (2011) para. 14.
- ⁵¹ Greenberg (2011) para. 15.
- ⁵² Greenberg (2010)p. 30.
- ⁵³ Greenberg (2010) p. 12-13.