

TUTELAGE AND REGIME SURVIVAL IN DEMOCRACY PROTECTION IN  
REGIONAL ORGANIZATIONS  
The Case of Mercosur and Unasur

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**S**INCE the 1990s, South American regional organizations have adopted, formalized and reinforced additional provisions to their constitutive treaties, sanctioning members that do not respect democracy. These ‘democracy clauses’ have played a central role in recent episodes of political unrest, either by being applied formally – as in the suspension of the membership rights of Paraguay by Mercosur and Unasur (June 2012), and Venezuela by Mercosur (August 2017) – or merely by being invoked, as during the impeachment procedures against President Rousseff in Brazil (in May 2016). Far from being an exceptional case, South American organizations are part of a wider trend, along with intergovernmental organizations in the rest of the Americas, Europe and Africa, all adopting formal democracy clauses.

This trend presents a puzzle: *a priori*, states are eager to retain their sovereignty unfettered. However, by adopting clauses of this kind, states subject their sovereignty to monitoring and even possible sanctions. This article addresses this conundrum by explaining why states decide to formalize binding and enforceable democracy clauses?

We argue that South American governments formalized democracy clauses as a reaction to concrete domestic threats with a specific goal in mind: to reduce political uncertainty and ensure government survival. Going beyond the existing literature, we also argue that governments have an asymmetric perception of the usefulness and enforceability of democracy clauses, and that those asymmetric perceptions decisively influence decisions to adopt formal clauses. Decision makers support the adoption of democracy clauses taking into consideration the perceived stability of their own government and that of other member states, and the likelihood of future enforcement of the clauses against their own countries.

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Governments which perceive themselves as unstable thus support the adoption and formalization of clauses to the extent that the provisions act to shield their own regimes. Moreover, they perceive that other states within the organization can effectively enforce these provisions if the former so demand. Conversely, governments which perceive themselves as stable and/or *too big to be sanctioned* support the formalization of clauses because they expect to be their future enforcers and not their targets. We argue that such governments understand democracy clauses as *tutelage mechanisms*<sup>1</sup> for third parties which are perceived as unstable governments. Motivation for tutelage can emerge from various reasons, such as the desire to protect regional stability or to project an image of being a regional leader or to defend ideologically like-minded governments. Despite these various possible motivations, the structural logic of tutelage remains: some governments perceive themselves as enforcers, while others perceive themselves and are perceived by others as requiring protection.

The literature on international institutions for human rights and democracy protection has overlooked the importance of *tutelage* to explain the formalization of international commitments. Former theorizing based on the European case argue that the agreement between consolidated democracies and new democracies explains the formalization, for instance, of human rights regimes. However, in regional environments in which almost all states transited to democracy simultaneously (e.g. South America), considerations of stability and enforcement capacity deriving from structural conditions such as size gain particular salience. The existent scholarship also fails to note that, differently from human rights protection through *supranational* courts, democracy clauses remain *intergovernmental* provisions. Lacking delegation to a supra state agent, enforcement of these provisions relies on states' own capacities. Governments' expectations of the capacity to provide tutelage play, thus, a crucial role in the decision to adopt formal democracy clauses.

We systematically test competing hypotheses to explain the adoption and formalization of democracy clauses. We do so by following the epistemological and methodological requirements of process-tracing analysis.<sup>2</sup> We use evidence drawn from interviews with decision makers from two South American regional organizations, Mercosur and Unasur, which have formalized and enforced their democracy clauses over the last two decades. These interviews reveal the motivations of the decision makers who participated in the design and adoption of Mercosur's and Unasur's clauses. The relative youth of the two organizations enabled us to reach the protagonists in this institutionalization process, and construct an original corpus of 34 interviews with top-level decision makers, including former heads of state and foreign ministers.

Our findings explain the design of these instruments in the specific case of South American regional organizations. The configuration of circumstances in this case permits us to draw some theoretical insights which orientate future research. Generalization beyond this case, however, requires further testing and evidence from other cases.

We develop this argument as follows. The second section discusses alternative theoretical explanations for the adoption of democracy clauses drawing on the broader literature about the design of international institutions for democracy and human rights protection.<sup>3</sup> We derive testable hypotheses from each theory. Next section presents the research design, case selection and methodology, and the fourth section tests the hypothesis against empirical data. Finally, we discuss the implications for theory and future research and the conclusion summarizes the thesis.

#### THEORETICAL EXPLANATION OF DEMOCRACY CLAUSES IN REGIONAL ORGANIZATIONS

Democracy clauses comprise a set of rules and procedures formalized into an international legal instrument (normally a treaty or protocol) through which international organizations

require states to be and to remain democracies as conditions of membership. These provisions define – with varying degrees of precision – their activation and verification procedures, as well as sanctions (economic and diplomatic sanctions and in some cases, suspension of membership) should any member state breach the democracy condition.<sup>4</sup>

Although the trend for adopting democracy clauses by intergovernmental organizations started immediately after the end of the Cold War, scholars have only recently begun to discuss the phenomenon systematically. Early attempts approached the trend as it became entrenched and shaped by the processes of integration and democratization unfolding in Latin American and Eastern Europe.<sup>5</sup> The fact that regions with a higher number of democratic states correlated significantly with democratic consolidation<sup>6</sup> paved the way for more systematic attempts to explain why governments agree to delegate democracy-protection competences to intergovernmental and supranational organizations, as well as to define what effects this has on democratic transition and consolidation.<sup>7</sup>

Despite the increasing number of studies on the adoption and enforcement of democratic norms at the regional level, few studies have tried to test competing theories. Furthermore, most studies tend to apply starkly different hypothesis-testing methods, ranging from Large N probabilistic analysis to individual case studies, complicating the assessment of the explanatory leverage of competing approaches and thus impeding theory-building. This article assesses and refines existing theories by deriving hypotheses suitable for testing through a process-tracing analysis.

We focus on three main competing explanations of the adoption of democracy clauses: diffusion mechanisms, societal-demand and regime survival. Students of the design of international institutions, and more specifically, those concerned with the institutional design of international democracy and human rights regimes apply them frequently.<sup>8</sup> To these well-established approaches, we have added a fourth based on the notion of tutelage. Taken

together, these explanatory accounts conflate two underlying theoretical dimensions: normative versus rational action logics on the one hand, and extra-regional versus intra-regional drivers on the other,<sup>9</sup> leaving us confident that the four explanatory approaches are comprehensive. For each theory we formulate hypotheses and test them against the empirical evidence.

#### DIFFUSION

As early as the in the 1990s, and motivated by the ‘third way’ of democratization, international legal scholars and institutional sociologists suggested the emergence of a global repertoire of norms which provide models and guidelines for emulation by states and organizations.<sup>10</sup> Thomas Franck argued that internationally shared expectations would positively reinforce the interests at stake in gaining legitimacy through the adoption of principles, rules and democratic procedures implemented and formalized through multilateral and regional institutions.<sup>11</sup> From a sociological institutionalist perspective, John W. Meyer pointed out that the existence of any such international standards provides a script for the emergence of a ‘world society’.<sup>12</sup> More recently, Tanja Börzel and Vera van Hüllen – drawing on Meyer’s insights – have argued that regional organizations adopt and adapt liberal normative standards (respect of democracy, human rights and the Rule of Law) contributing to patching together a ‘global script’.<sup>13</sup>

In this theoretical account, diffusion comes about because of the normative appeal of global values which lead governments to accept binding international norms and standards, rather than resulting from specific agency.<sup>14</sup> Hence, Franck sees compliance with international law as a function of the normative acceptance of international rules, which in turn reflects their consistency with domestic values.<sup>15</sup> We can translate this normative influence into a first diffusion hypothesis:

—H1.1. Normative emulation hypothesis: decision makers formalize democracy clauses to be congruent with global norms considered legitimate.

The previous hypothesis presupposes a non-directed diffusion process led by the emulation of norms in which domestic actors play a central role. Alternatively, external actors may play a prominent causal role as diffusers of norms and institutions. The key causal mechanism in these diffusion processes are incentives which normally take the form of conditionality. For instance, extra-regional actors reward the introduction of a democracy clause with market access (e.g. through a preferential trade agreement), financial or technical assistance, or development aid. They can also exert direct influence by supporting or empowering domestic actors to push for the adoption of certain norms and governance standards.<sup>16</sup>

In a different interpretation, external actors may promote certain institutions and norms because these fit the universal values to which those actors adhere. In this case external actors must engage in processes of persuasion and socialization<sup>17</sup> to convince intra-regional actors about the appropriateness of adopting those norms.<sup>18</sup> Socialization and persuasion do not entail rewards and sanctions, but are based on argument and justification, and require sustained interaction between the promoters and the recipients of a norm.<sup>19</sup> The EU's external policies, which have typically included democracy promotion<sup>20</sup> in bilateral agreements, exemplify direct-influence diffusion, particularly in the case of EU's strategic partnership and association agreements with South American countries.<sup>21</sup> In either case, formalization happens because of the action of external actors and this inspires the formulation of a direct-influence diffusion hypothesis:

—H1.2. Direct-influence diffusion: decision makers formalize democracy clauses because of the influence (through incentives or persuasion) of extra-regional actors.

#### SOCIETAL DEMAND

Focusing on internal or endogenous processes, the most prominent explanation argues that national decision makers agree on ‘tying their hands’ through formal commitments, such as democracy clauses, because they expect those commitments to be functional to their own goals, such as the solution of issue-specific problems.<sup>22</sup> Beyond this basic agreement, however, approaches differ on the causal mechanism which causes governments to ‘tie their hands’ through a democracy clause.

A first approach focuses on the demands of societal, mostly economic, constituencies. Following the liberal tradition of new-institutionalism, it contends that states adhere to international organizations to make a credible commitment vis-à-vis societal constituencies that they will preserve pro-market policies. Through membership in these organizations, states lock-in the preferences of domestic constituencies – mainly firms and economic elites – which deem democracy as a better regime to protect their economic interests and rights, especially property rights and liberalization reforms crucial for ‘doing business’.<sup>23</sup> Domestic actors perceive international agreements as powerful tools to reduce transaction costs and to commit credibly to liberal economic policies.<sup>24</sup> By-and-large, this literature has not theorized specifically on the reasons for the formalization of democracy clauses, Genna and Hiroi<sup>25</sup> being an exception. Accordingly, we propose the following societal-demand hypothesis:

—H2.1. Societal-demand hypothesis: Decision makers formalize democratic clauses to respond to domestic demands for locking-in liberal pro-market preferences.

#### REGIME SURVIVAL

A different body of scholarship suggests that decision makers seek to reduce political uncertainty and therefore, lock-in regime survival rather than liberal policies. The literature on international regimes for democracy and human rights protection has focused on how the membership in a regional organization can help states dissuade potential domestic destabilizers. By acceding to regional organizations, national democratic actors raise the cost of potential disruptive acts, thus dissuading other actors who might be motivated to seek power outside the democratic rules and procedures.<sup>26</sup> Surprisingly, this logic is not exclusive of democratic regimes since students of the international aspects of authoritarianism have identified a similar one: authoritarian regimes also engage with regional organizations and alliances to protect themselves from potential internal or external destabilizers.<sup>27</sup> Like in the case of societal demands, these arguments are notably indifferent to whether or not regional organizations adopt certain provisions such as clauses and sanctions, directly linking membership in an organization with the outcome, i.e. regime survival.<sup>28</sup> Despite lack of specific attention to formalized clauses and in parallel to the previous hypothesis, we can infer from this theory that governments will push for the formalization of clauses and sanctions, to increase the costs of destabilizing behaviour, further reducing uncertainty and ultimately increasing the likelihood of regime survival

Furthermore, the more immediate the threats against a certain regime become, the more intense the government's preferences to enhance domestic stability and hence the greater the pressure to adopt provisions at the international level.<sup>29</sup> These threats alter the



calculations of decision makers, enhancing the probabilities that the preference for a collective commitment – e.g. a democracy clause – will outweigh the potential losses of sovereignty: in other words, under the influence of the occurrence of domestic threats, governments will be prone to tie their hands and increase the odds of regime survival.

H.3 Regime-survival hypothesis: decision makers adopt democracy clauses as a reaction to political uncertainty.

#### TUTELAGE

When introducing the regime-survival hypothesis, the literature overlooked a crucial theoretical issue. The effects of domestic threats on regime survival do not translate automatically into the decision to adopt a formal instrument, such as a democracy clause: decision makers' present perceptions and future expectations mediate between the events and effective formalization. These asymmetric perceptions and expectations generates a relation of tutelage in which some decision makers conceive their states as “protectors” and “enforcers”, while others as “protected” and “demanders” of a certain provision, such as a democracy clause. We operationalize tutelage in two final hypotheses.

First, actors have different perceptions of the relative stability of their own regimes, and these perceptions may have an influence on their preference for adopting democracy clauses. Given a certain critical domestic threat, governments which perceive themselves as *unstable* will demand the adoption of a democracy clause for the sake of its own usefulness, while governments which perceive themselves as *stable* will support such adoption as functional for ‘others’. While the motivation of less stable governments can be easily deduced (i.e. to shield themselves from domestic threats), the motivation of self-perceived stable governments can vary, combining utilitarian and normative reasons. Accordingly, they

can be moved by self-interest, promoting a stable regional environment or to project an image of regional leadership.<sup>30</sup> However, they might also pursue normative or ideational motivations, such as to preserve a certain regional identity (e.g. a concertation of consensus-seeking and peaceful nations),<sup>31</sup> or to defend ideologically like-minded governments.<sup>32</sup> The following hypothesis captures the differences between these two types of actors while assuming that the motivations of self-perceived stable democracies can originate according to different logics, while leading to the same outcome.

—H.4.1. Asymmetric self-perceptions: decision makers formalize democracy clauses as functional for themselves or functional for others, depending on their self-perception of stability.

Second, government expectations of the future enforcement of such clauses – and not just present perceptions – can also have implications on the decision to adopt them.<sup>33</sup> The enforcement expectations play a pivotal role when *intergovernmental coordination*, rather than *supranational delegation*, enforces binding institutional commitments. The distinction between these two types of institutional design is crucial when we move from the study of “human rights protection” to the study of “democracy protection”.<sup>34</sup> For instance, Moravcsik’s thesis on the protection of human rights through the European Convention on Human Rights relied on an institutional design in which states delegated authority to a court. When states delegate the implementation of a norm to a supranational body (e.g. a regional court or tribunal), its enforcement relies at least to a larger extent on the body’s capacities. On the contrary, in intergovernmental designs, such as democracy clauses, enforcement becomes subject to inter-state bargaining and therefore, asymmetric enforcement capabilities play a larger role.<sup>35</sup> Existing cases of regional organizations protection of democracy rely, in almost all cases, on intergovernmental mechanisms.<sup>36</sup>

Larger states face easier enforcement conditions than smaller ones. For the latter, enforcement on large states may be too costly. In fact, research into the enforcement of democracy-protection norms has shown that the interests of regional powers (along with the external pressures of extra-regional powers) and the presence of competing geopolitical interests are key factors explaining variation in enforcement.<sup>37</sup>

Even though this article does not deal with actual enforcement, we suspect that different enforcement expectations can influence the decision to adopt formal democracy clauses. Actors anticipate enforcement probabilities and position themselves accordingly. Thus, governments facing domestic threats which believe that the clause can be enforced for their protection will support them. Anticipating the possibility of enforcing sanctions, decision makers from smaller member states would be relatively sceptical about their ability to do so. Governments in larger member states will feel confident about their ability to enforce democracy clauses should any breach of democracy happen in smaller and less stable members.

These likely enforcers (large and more stable member states) perceive themselves as ‘protectors’ or ‘guardians’ of smaller and less stable members, creating a tutelage relationship. This departs from the theoretical insights derived from the European case in which the existence of consolidated democracies alongside less stable or new democracies allows to refer to an agreement between the two as the basis of institutional formalization.<sup>38</sup> In an environment in which states transited practically simultaneously from authoritarianism to democracy, and with notable differences in size among them, the expectations of effective enforcement capacity plays a significant role to explain formalization.

Accordingly, we propose this final hypothesis:

—H.4.2. Asymmetric enforcement-expectations hypothesis: decision makers will support or oppose the adoption of democracy clauses depending on their expectations regarding the future enforcement of these norms against their own countries.

#### SUMMARY OF THE HYPOTHESES AND OBSERVABLE IMPLICATIONS

Even though these four theoretical explanations (diffusion, societal-demand, regime survival, and tutelage) entail different assumptions and scholars conceive them of as competing explanations of international norms adoption, we believe that the hypotheses do not necessarily exclude each other. On the one hand, more than one causal mechanism can intervene to explain why the governments in a particular region adopt and formalize democracy-protection norms in the form of democracy clauses. On the other hand, actors often explain their decisions by appealing simultaneously to different explanatory factors with different theoretical foundations. Explanations deriving from different theoretical approaches thus provide elements for explaining the outcome of interest: the adoption and formalization of democracy clauses.

Table 1 summarizes the hypotheses and their respective observable implications. Observable implications are the specific pieces of evidence which we would observe *if* a specific hypothesis is confirmed.<sup>39</sup>

#### RESEARCH DESIGN, METHODS, AND DATA

This article investigates the adoption and formalization of democracy clauses in South American intergovernmental organizations. We follow the methodological and epistemological assumptions of process tracing analysis.<sup>40</sup> Process tracing consists of the identification of ‘causal variables said to conduce to a specific type of outcome to be

explained as well as an accompanying account, which may be more or less formal, about how those and other variables interact in the causal chain that leads to the outcome'.<sup>41</sup> Process-tracing analysis seeks to explain a certain outcome of interest *causally*, rather than correlate the systematic variation of an independent and a dependent variable as in co-variation methods. In our case the outcome to be explained is the adoption of formal democracy clauses. For each theory discussed in the second section we infer a hypothesis and its observable implications regarding this outcome *as if* each of the causal factors were in place. Then we search for the evidence needed to discriminate between the competing explanations.<sup>42</sup>

#### CASE SELECTION

We have traced the process of adoption and formalization of the democracy clauses in two regional organizations in South America: Mercosur and Unasur. Mercosur originated in the restoration of bilateral relations between Argentina and Brazil after the end of the military governments in the 1980s. Initially, it comprised four states (Argentina, Brazil, Paraguay and Uruguay) but Venezuela became the fifth member state in 2012 (although suspended since December 2016), whilst the other South American countries (Chile, Colombia, Ecuador, Guyana, Peru and Surinam) are associated members. Unasur in turn comprises the twelve countries in South America (including the five full members and the associated states of Mercosur). Its original purpose was limited to infrastructure integration and to the ill-fated attempt to make Mercosur and the Andean Community converge into a South American Free Trade Area.<sup>43</sup>

Even though decisions to create the two regional organizations occurred against very different historical backgrounds, their democracy clauses are interlinked. In fact, Unasur builds on and expands the Mercosur acquis regarding democracy protection. Furthermore, both organizations have created coordination mechanisms and have in fact concerted their

actions in cases of democratic crisis such as the impeachment of President Fernando Lugo of Paraguay in 2012. Finally, their membership tends to overlap and in fact, the Unasur members associated to Mercosur are also subscribed to the latter's democratic clause.

We selected these two organizations because, first, both have been particularly active in democracy protection and have concentrated the most recent cases of crisis-management in South America in recent years. In fact, Mercosur intervened in four democracy-related crises in Paraguay (1996, 1999, 2000 and 2012) and Unasur intervened in four other events (Bolivia 2008, Ecuador 2010, Paraguay 2012 and Venezuela 2013–2016).

Second, Mercosur and Unasur are relatively underexplored cases of regional democracy governance and most of the literature on the issue remains descriptive rather than explanatory. Exceptionally, Andrea Ribeiro Hoffmann and Ann van der Vleuten<sup>44</sup> have identified causal explanations for the *intervention* by regional organizations including Mercosur and Unasur. However, they have not explained why regional organizations adopt democracy clauses, which is the primary object of the present article. This limited range of works contrasts with the relatively recent formalization of their respective clauses, which means that the key decision makers remain accessible. This is the first paper researching the motivations of decision makers to adopt democracy clauses in South America.

## METHODS

We consider decision makers as the units for analysis. To generate evidence on their reasons for the decisions taken, we conducted semi-structured interviews with them. Such interviews 'shed light on the hidden elements of political action that are not clear from an analysis of political outcomes or other primary sources'.<sup>45</sup> Semi-structured interviews allow interviewees freely to express their own views on the subject. This diminishes the margin for the interviewer to manipulate data by imposing interpretative schemes when asking questions. Interviewees were free to provide or to refrain from providing arguments which support any

or none of the hypothesis informing the research. The actors' claims permit us to verify if the actors' various actions and statements at each stage of the causal process are consistent with the image of the world implied by the theory.<sup>46</sup> The actors may also suggest alternative explanations. In practical terms, the question which informed the interviews was 'why did you decide/agree to the formalization of this provision?'

We conducted 34 interviews with senior decision makers comprising Presidents, Foreign Ministers, Secretaries of State, Ambassadors and other high officials within the national administrations (Annex I lists the interviews). We selected them applying positional sampling<sup>47</sup> and, for this, we used their participation in the design and adoption of the democracy protection protocols in Mercosur and Unasur as the criteria for their inclusion in the sample. We conducted interviews during two periods of fieldwork (March and July 2015) in Asunción, Buenos Aires, Florence, Madrid, Montevideo, Quito, Rio de Janeiro and Sao Paulo. Only one interviewee asked us to omit his name in the narratives: consequently, we removed his name from this article.

Focusing on decision makers permits us to respond to the criticism usually levelled against using evidence drawn from interviews with other types of actors (such as practitioners and commentators): drawing conclusions from the opinions of those who were not directly involved in the political process of interest. We deliberately asked our interviewees to focus on the original reasons and motivations behind the decision to adopt and formalize the clause. In doing so we sought to neutralize the bias behind many functionalist accounts which infer the actor's motivations from the effects and outcomes of a certain institution.

To make the interpretation of the claims made by decision makers as objective and reproducible as possible, we codified them. Codification yielded a set of 163 claims which we analysed using Atlas.ti©. We generated a codebook composed of first and second level codes (See Annex II). We *deduced* first level codes from each of hypothesis. We then

disaggregated these first level codes into several second level codes assisted by an inductive preliminary analysis of the interviews. We assigned the claims extracted from interviews to these second level codes, which were in turn grouped and associated with the first level codes. Both authors separately codified claims and we then compared codifications. Once we agreed on differences in codification, we ran an inter-coder reliability (replicability) test, asking an external observer to assign codes to the same set of 163 claims. We applied the Krippendorff's Alpha coefficient. The result ( $\alpha \geq 0.6849$ ) locates our results above the lower threshold ( $\alpha \geq 0.667$ ) and permits us to consider our interpretations reliable.<sup>48</sup>

We have addressed potential biases and questions regarding the reliability of the data from interviews: doubts can arise about the value of the actors' subjective interpretations. We asked some interviewees about decisions taken fifteen or twenty years ago, which carries with it the risk that potential imprecisions and lacunae bias recollections. Additionally, cases of enforcement of these provisions may affect the actors' perceptions. To reduce these potential reliability problems, we also interviewed a number of academics to obtain background information which permits the identification of potential contradictions and/or inaccuracies (we report these interviews in the annex but we did not include the claims from academic sources in the data set). We also triangulated the information we received with written primary sources (newspapers and memoirs) and bibliographies which consider the events to verify accounts and detect eventual mistakes in the actors' recollections. Annex III provides all the quotations and maps them to their corroborative citations.

#### DRAWING INFERENCE FROM EMPIRICAL DATA ON HYPOTHESIS

Given that decision makers were the unit of analysis, we determined that a necessary condition for confirming a hypothesis was that at least three actors from three different member states must coincide in their stated reasons for decisions. Since Mercosur had four



member states at the time of completing this research, this requirement created a relatively robust requirement. Additionally, we considered as confirmatory cases where no contrary evidence (i.e. actors explicitly arguing against a specific hypothesis) was found. The number of claims alone does not provide strong evidence since a single actor can repeat the same claim a number of times. Annex IV contains a table which presents the occurrence of actors, claims and states with an illustrative value.

#### ANALYSIS AND RESULTS

Governments originally created both Mercosur and Unasur without democracy clauses and they formalized these provisions later on. Mercosur originated as a pre-eminently trade-integration project in 1991 and its Presidents committed themselves *informally* to democracy protection through presidential declarations (i.e., the Declarations of Las Leñas (1993) and Potrero de los Funes (1996))<sup>49</sup> lacking binding effect. Mercosur adopted a democracy clause in 1998, the Ushuaia Protocol signed by the four Mercosur member states, and the two associated states of Bolivia and Chile. These governments adhered to a liberal understanding of democracy.

In 2011 a second Mercosur democracy clause, the Protocol of Montevideo (Ushuaia II hereafter) enlarged the list of signatories by adding Venezuela, Colombia, Ecuador and Peru, thus comprising all the geographical territory of South America with the sole exception of Guyana and Suriname. Ushuaia II added the identification of possible ‘threats’ to the existing ‘effective breaches’ as causes for activation, and included a list of sanctions. Like its predecessor, Ushuaia II required unanimity to enter into force and the Paraguayan Senate’s objection to the sanctions and their potential disruptive impact on the country has impeded its ratification so far (i.e. 2017).

Unasur's 2008 constitutive treaty referred only informally to democracy protection in its preamble. Two years later, the Protocol of Georgetown formalized the commitment into a democracy clause which included both the reference to threats and sanctions. Distinct from the two Mercosur Protocols, the Protocol of Georgetown required ratification by nine member states to enter into force, which eventually occurred in 2014, with Paraguay being the only country which had not ratified the protocol by 2017.

Ushuaia II and the Protocol of Georgetown share many characteristics, to the point of having the same wording in some provisions.<sup>50</sup> In contrast to the signatories of the original Ushuaia I, the governments which negotiated and signed both the Ushuaia II and Protocol of Georgetown adhered to various political ideologies, ranging from centre-right neoliberal governments (Colombia, Chile and Peru) to socialist so-called 'Bolivarian' governments (Bolivia, Ecuador and Venezuela). In turn, at the time of the signature of Ushuaia II, the governments of all four Mercosur member states considered themselves left-wing.

So why did South American governments decide to move from informal commitments to formal democracy clauses?

#### TESTING DIFFUSION HYPOTHESES

According to the 'normative emulation hypothesis' (H1.1) decision makers formalize democracy clauses because of the adherence to global norms and values. In fact, decision makers referred to the existence of a normative background – the 1991 OAS Santiago Declaration, the 1992 OAS Washington Protocol and the 1996 EU Treaty of Amsterdam – in the early stage of informal commitments to democracy protection, *before the formalization of the clauses*. Thus, some decision makers explained *informal* collective declarations such as the Las Leñas Declaration on referring to these other norms,<sup>51</sup> and they presented this as the morally correct thing to do.<sup>52</sup> However, actors do not construct a causal connection between

such a normative background and the *formalization* of the democracy clauses. In other words, normative emulation had an influence only on the early 1990s Mercosur presidential declarations which lacked obligation (binding force) and enforcement capacity. As we will discuss below, these declarations only escalated into fully fledged operational and enforceable mechanisms because of other reasons.

According to the ‘Direct-influence diffusion’ hypothesis (H1.2), decision makers would identify the incentives, pressure or persuasion exercised by external actors as the cause of the formalization of democracy clauses. We did not find evidence to support this hypothesis. Decision makers allude to external organizations (e.g. the EU) but none of them mentioned that external actors used any incentives, sanctions or persuasion to motivate the adoption of these protocols. This negative finding stands in sharp contrast to the EU’s imposition of democracy protection clauses in the bilateral association and strategic partnership agreements negotiated with specific South American countries. Only the former Chilean Foreign Minister and OAS General Secretary José Miguel Insulza claimed very emphatically that the negotiations of South American countries with the EU prompted the Mercosur Protocol of Ushuaia.<sup>53</sup> However, no other actor backed this view.

In a nutshell, diffusion theories do not explain the decision to adopt democracy clauses by South American organizations. The evidence collected only supports a normative emulation in early stages of the institutionalization process (informal declarations).

#### TESTING THE SOCIETAL-DEMAND HYPOTHESIS

According to the ‘societal-demand hypothesis’ (H2), decision makers translate the pressure from domestic actors in favour of a liberal economic order into the formalization of democracy clauses. *A priori*, the ‘societal-demand’ hypothesis stands out as a powerful explanation of democracy clause adoption in the region. In fact, both the Mercosur Las Leñas

Declaration (1992) and Article 1 of the Protocol of Ushuaia contained the same wording which made the *maintenance of democracy an 'indispensable' condition for the development of the integration process*. Being integration process in Mercosur a highly liberalizing project in its early stages, this specific sentence conveys an impression coherent with the hypothesis that liberal pro-market preferences stemming from societal constituencies are being defended. Despite this, there is no evidence that the preferences of certain domestic groups on issues such as free trade inspired decision makers to draft these provisions or influenced them during the drafting process, or that the drafters took these preferences into account.<sup>54</sup> This finding coincides with the rather secondary role assigned to interest groups in more general studies on the design of the Mercosur institutions.<sup>55</sup>

The collected evidence not only disconfirms any role for pro-market societal groups but also questions the very theoretical foundation of this hypothesis. On the one hand, some of the most liberal and free trade-minded decisionmakers (e.g. Uruguay's President Luís Alberto Lacalle) showed open distrust and lack of confidence in the value of democracy clauses.<sup>56</sup> On the other hand, and more decisively, the upgrading of the provisions and formalization of Ushuaia II and the Protocol of Georgetown coincided with a shift in regional integration in Latin America towards a model which questioned and rejected precisely liberal market-led integration<sup>57</sup>. Decision makers have consistently pointed towards the ideological change implicit in the creation of Unasur and the 'politization' of Mercosur entrenched in an explicit rejection of 'liberalism' as the ideological environment for the creation of the Protocols of Georgetown and Ushuaia II.<sup>58</sup> Against this changing landscape, certain liberal and trade-oriented groups actively started to demand withdrawal from Mercosur in countries like Brazil, and the search for alternative trade relationships.<sup>59</sup>

TESTING THE REGIME-SURVIVAL HYPOTHESIS

Regime survival plays a central causal role in the narratives of decision makers. Consistent with the literature on international democracy protection institutions, several decision makers linked the institutionalization of Mercosur in the 1990s with the reduction of political uncertainty throughout the ‘transition to democracy’ process.<sup>60</sup> However decision-makers did not refer to regime survival as an abstract possibility: When asked explicitly on the formalization of the Protocol of Ushuaia, they explicitly link the Protocol with regime protection in one specific member: Paraguay.<sup>61</sup> Actors explicitly refer to the democracy clauses’ ‘lock-in’ effect<sup>62</sup> and more precisely, in relation to their sanctioning capacity. Decision makers involved in the adoption of the Protocols of Ushuaia II and Georgetown also provide evidence supporting the regime survival hypothesis. Formalization of those clauses responds to the widespread unconventional threats to left-wing governments. Those governments increased the dissuasive potential of the clauses through the formalization of stronger sanctions.<sup>63</sup> The majority of decision makers considered specific ‘critical domestic threats’ as immediate triggers of the formalization of the democracy clauses in both Mercosur and Unasur.

Evidence from non-Paraguayan<sup>64</sup> and Paraguayan decision makers<sup>65</sup> conclusively identify the failed attempted *coup d'état* in Paraguay in 1996 against President Wasmosy as the reason behind the formalization of the Protocol of Ushuaia. Crucially, some of the interviewees, such as Paraguay’s President Juan Carlos Wasmosy himself and former foreign ministers Rubén Melgarejo and Leila Rachid, held prominent positions during this event. Paraguayan actors also underlined their own leadership in drafting the Protocol in response to the critical threats.

Domestic threats also triggered the formalization of the Unasur’s Protocol of Georgetown, although the actors do not fully and completely agree on the identification of a specific decisive event. They most often cited the attempted *coup d'état* against President

Correa in 2010.<sup>66</sup> Some actors added the threat of secession in Bolivia in 2008 (involving political violence),<sup>67</sup> and also the continuous political instability in Paraguay.<sup>68</sup> Additionally, decision makers linked the removal of President Zelaya in Honduras in 2009 with the formalization of the Protocol of Georgetown even though it affected a Central American state outside the scope of Unasur.<sup>69</sup> The *coup* in Honduras as a ‘wake-up call’<sup>70</sup> or as ‘an event which switched on the lights’.<sup>71</sup>

Taken together, all these events threatening incumbent governments increased the perception of political uncertainty, spurring the formalization of democracy clauses in South America. The succession of domestic threats in several countries explains why Mercosur and Unasur formalized the Protocols of Ushuaia II and Georgetown in such a short period (1–2 years) Figure 1 shows the temporal association between domestic threats and instruments.

Therefore, the ‘regime survival hypothesis’ (H.3) stands as a powerful explanation of the adoption of democracy clauses.

#### TESTING THE TUTELAGE HYPOTHESES

But did all states perceive the increasing political uncertainty equally? According to H4.1, self-perceptions regarding political stability and consequently, the asymmetric needs for protection among member states explain the formalization of democracy clauses. We expected that decision makers who perceive their states as stable would argue that they did not need these provisions for themselves and conversely, would argue that their adoption responded to the needs of other, less stable states. In turn, those countries which suffered domestic threats (i.e. Paraguay, Ecuador or Bolivia) would have been perceived as addressees of these provisions. We would also expect that decision makers from these countries would have coincided in perceiving these provisions as instrumental on themselves.

Our findings strongly support this hypothesis. As required by our validation test, decision makers from the three other Mercosur members argued Paraguay needed the Protocols of Ushuaia and Ushuaia II.<sup>72</sup> Coincidentally, decision makers from Paraguay strongly agreed that they required the Protocols because they were useful for their own country.<sup>73</sup> Our findings also confirm that decision makers coincided in their identification of which countries did not need the provision. Neither Brazilian,<sup>74</sup> Uruguayan<sup>75</sup> nor Chilean actors<sup>76</sup> perceived the Protocol as necessary for protecting their democratic regimes. Furthermore, decision makers also coincided in identifying the countries which did not need democracy protection altogether: they excluded Argentina, Brazil and Uruguay as potential addressees of the Protocols.<sup>77</sup> The interviews consistently repeated this pattern.

Our theoretical expectations also hold for Unasur's Protocol of Georgetown, which basically repeated the pattern observed for Mercosur. Unasur's Protocol differed in that it comprised an enlarged number of potential addressees also related to its broader membership: interviewees often mentioned Paraguay<sup>78</sup> along with two other countries, Bolivia and Ecuador, in which domestic threats occurred between 2008 and 2010.<sup>79</sup> Decision makers suggested the emergence of a new notion of regional instability which justified the formalization of democracy clauses.<sup>80</sup> Again we find the same pattern – the decision makers who perceived their states as more stable dismissed the functional value of the protocol for their own countries: both Argentinian<sup>81</sup> and Uruguayan<sup>82</sup> decision makers discounted the relevance of Unasur's Protocol of Georgetown in protecting their regimes, but still supported its adoption as functional for protecting third countries.

According to our expectations, the perceptions on the instrumental value of a democracy clause vary among the members within the same organization. Some governments perceived clauses as functional for their own democratic stability while others felt them to be functional for other states believed to be less stable and needing 'tutelage'. Governments

from specific countries maintained stable perceptions on whether they needed those clauses or not irrespective of the ideological U-turn which affected most states in the region in the first decade of the 2000s. Paraguayan actors thus demanded tutelage both with liberal centre-right (Juan Carlos Wasmosy) and left-wing governments (Fernando Lugo). Argentina, Brazil and Uruguay perceived themselves as providers of tutelage regardless whether they were governed by centre-right and centre-left liberal governments (Carlos Menem, Fernando Henrique Cardoso, and Julio María Sanguinetti) or left-wing governments (Cristina Fernández de Kirchner, Luiz Inácio Lula da Silva and Dilma Rousseff, and José Mujica).

The relative perceptions on the need for these clauses do not exhaust the explanations for their formalization, however. According to the ‘asymmetrical enforcement expectations’ hypothesis (H.4.2), we expected that decision makers would refer to their enforcement capacity to explain their preferences for formalized clauses. Decision makers from smaller member states (i.e. Paraguay and Uruguay) would express scepticism at their capacity to enforce these provisions against the larger member states (i.e. Argentina and Brazil). Our evidence also supports this hypothesis. Decision makers generally understood that the intergovernmental character of the democracy clauses (and Mercosur and Unasur themselves) meant that enforcement depended on the states themselves.<sup>83</sup> Actors perceived enforcing these provisions against smaller member states (such as Paraguay or Guyana or Surinam) as possible and credible.<sup>84</sup> In parallel, none believed enforcing them against larger member states as possible or credible, with Brazil being singled out in this connection.<sup>85</sup> Decision makers identified Brazil as the country which concentrated enforcement capacity,<sup>86</sup> while Paraguay featured prominently in the opposite situation as a ‘recipient’.<sup>87</sup> Against the intuition that such asymmetry would cast doubts on the very enforceability of the clauses, surprisingly only one decision maker (and one advisor) referred to them as ‘rhetorical commitments’.<sup>88</sup> The interviewees held the same enforcement expectations for Mercosur’s



and Unasur's clauses and they did not vary when the ideological orientation of governments changed.

In summary, the conception of democracy clauses as tutelage mechanisms by which perceived more stable and/or larger member states oversee perceived less stable and smaller member states, emerges as one of the most solid findings.

## DISCUSSION

Our findings show that South American governments adopted formal democracy clauses as instruments intended to reduce political uncertainty and ensure regime survival. Political uncertainty, however, does not relate to the 'age' of the democracy<sup>89</sup> – since South American states transitioned to democracy more or less at the same time – but rather to concrete domestic threats. In coincidence with previous work, our findings prove that governments support the adoption of democratic clauses linking democracy to securing their own regimes' survival.<sup>90</sup>

Moreover, our findings show that the asymmetric perceptions and expectations of states mediated the decision to adopt democracy clauses, an aspect which the literature on international democracy and human rights protection regimes has hitherto overlooked. Perceptions differ in relation to the need of protecting democracy (as the regime survival thesis predicts) but also on enforcing these mechanisms. Differently to supranational regimes for the protection of human rights which delegate powers to courts, democracy protection depends on strictly intergovernmental mechanisms. Hence, enforcement rests on member states will and capacities. The expectations that governments have on each other future enforcement capacities become crucial for the decisions to formalize a democracy clause.

Findings have shown two different types of perception. Governments which perceive themselves as relatively stable and which expect that the enforcement of a clause against their own countries is unlikely, tend to support the adoption of democracy clauses inasmuch as it is

functional for third countries. For this first group of governments, the trade-off between ‘tying their hands’ and ‘sovereignty losses’ does not exist because they do not expect the clauses will affect their sovereignty in any significant way. Moreover, they conceive themselves as the enforcers of the clause, exerting tutelage over their smaller and less stable neighbours. Their motivation could equally result from instrumental (e.g. securing the regional environment) or ideational (e.g., commitment to specific understandings of democracy) reasons.

Those governments ‘under the tutelage’ of the enforcers locate themselves on the opposite side. Because their countries have experienced critical destabilization, they perceive themselves as unstable and therefore expect that such clauses will have a dissuasive effect against potential aggressors, reinforcing regime survival. For these countries under tutelage, the potential loss of sovereignty through monitoring or sanctioning does exist, but it is outweighed by the need to curb domestic threats.

The findings decisively support our “Tutelage” theory showing that not all regional organization member states want and need to ‘tie their hands’ in the same way, and that they are fully aware that the enforcement of the newly adopted norms is credible only against some countries and not others. The awareness and crudity with which decision makers referred to the asymmetries among states and their impact on their decision to formalize clauses is a somewhat striking finding of this article.

Equally striking is that government preferences remain relatively stable irrespective of ideological change. In fact, the governments which participated in the adoption of the Protocol of Ushuaia I in 1998 were ideologically at odds with those which participated in the adoption of the Protocols of Georgetown and Ushuaia II in 2010–2011. Our findings, however, lead us to nuance the effect of ideological change on the preferences of governments at the moment of deciding whether to formalize an informal commitment into a

democracy clause. Thus, self-perceived enforcers remained constant despite the ideological change in government. the governments of F.H. Cardoso (centre-right), and Lula da Silva and D. Rousseff (left) in Brazil, as well as the governments of C.S. Menem (centre-right) and C. Kirchner (left), shared similar perception on the value of these provisions for themselves and their enforcement role. A similar case can be made for those states whose governments perceived the provisions as necessary for them: Paraguayan Presidents J.C. Wasmosy (centre-right) and F. Lugo (left) behaved both as ‘demanders’ of the Protocol of Ushuaia I and Ushuaia II respectively. Tutelage influenced the decision to adopt democracy clauses in spite of ideological differences.

We cannot dismiss, however, the role that ideological affinity may have had on the actual decision *to enforce* the clauses (and especially the sanctions comprised). Recent cases of enforcement of the suspension clause of the Protocol of Ushuaia I against Paraguay (in 2012) and Venezuela (2017) suggest that ideology might play a role in their implementation. In the first case, Mercosur governments suspended a centre-right government in Paraguay after the impeachment procedure against the left-wing government of Fernando Lugo (ideologically aligned with the governments of the other three member states). The opposite is true for the second case: Mercosur suspended the left-wing government of Nicolás Maduro after two centre-right governments in Argentina and Brazil took power and persuaded the undecided left-wing government in Uruguay to support suspension. However, the politics of enforcement should not be conflated with the politics of adoption of democracy clauses, which is the primary object of this article. For the latter, regime survival and tutelage remain the most relevant explanatory factors.

## CONCLUSIONS

This article has investigated the reasons for and motivations behind the decision to formalize informal commitments to respect democracy into democracy clauses codified by the legal instruments of Mercosur and Unasur. In so doing we have sought to contribute to theory-building by testing and refining competitive explanatory accounts drawn from current theories in the broader field of international institutions for democracy and human rights protection. The study of the reasons for the formalization of mechanisms for the protection of democracy in cases of regional organizations different to the European one contributes to liberate theorization from the dominance of Eurocentrism. In this respect, this research represents a building stone to assert comparative regional governance as a field whose empirical referents and, hence, theorization bypasses the temptation to make the European case the “model” for others, a tendency denounced by several theorists (Acharya; 2012; Breslin and Higgot; 2012).

We conclude that diffusion mechanisms have a marginal causal effect on the decisions of South American governments to adopt democracy clauses. The ‘global script’ of democracy protection norms certainly created a favourable milieu for the discussion of democracy at the international forums of regional organizations such as OAS and, in our case, Mercosur. Normative emulation led towards informal and non-binding presidential declarations, but *did not cause* the adoption of formal and binding clauses. Likewise, South American political actors look to other regional organizations (such as the EU and the OAS) to draw inspiration for drafting the texts of their democratic clauses, but those regional organizations did not have a direct effect on the decision to formalize these clauses. This first finding nuances the ‘normative power’ argument which has been so common, especially in EU external relations studies.

Regime survival theory seems better equipped than diffusion theories to explain the adoption of democracy clauses in South America. Our findings show that decision makers consented to formalizing democracy clauses in order to reduce the political uncertainty which stems from concrete domestic threats. The succession of such threats, first in 1996–1998 (adoption of Ushuaia I), and then between 2008 and 2013 (the period of adoption of both the Unasur Protocol of Georgetown and the Mercosur Protocol of Montevideo-Ushuaia II) enhanced the probabilities for further institutionalization of democracy protection norms.

We have further refined the regime survival explanation by introducing the notion of tutelage, and by paying systematic attention to the asymmetries in self-perceptions and enforcement expectations among states. We have showed that the way in which governments perceive their own stability as well as their expectations regarding the future enforcement of a norm is causally linked to the decision to support the formalization of democracy clauses. These asymmetric perceptions create a tutelage relationship, in which some countries are perceived as the enforcers and protectors, while others as those to be protected. Any such tutelage relationship remained relatively stable regardless the change in the ideological orientation of the governments in the region. In a regional environment in which states have transited, with a few exceptions, from authoritarianism to democracy simultaneously, size considerations became more evident as a relevant explanatory factor. This finding may pass relatively unnoticed in environments in which sharp differences in terms of democratic consolidation exist.

Our findings open the way for future avenues of research. The interplay between these self-perceptions and expectations and domestic politics have to be better specified. Domestic politics are relevant for the formalization of democracy clauses insofar as the national parliaments must ratify the decision made by the heads of state. Accordingly, the legislative debates need to be researched. Research is also needed to specify the role of these

asymmetric perceptions and expectations – and the ensuing tutelage relationship – during the enforcement of the clauses. Recent cases of enforcement of Mercosur and Unasur clauses indicate that ideological affinity may play an important role in explaining the attitudes of states towards enforcement and particularly, sanctions.

Finally, the generalization of our findings must be tested through the analysis of the adoption and formalization processes of democracy clauses by other regional organizations, not only in Latin America, but also in other regional contexts such as Africa. Special attention must be paid to the factors which explain the adoption of overlapping democracy protection regimes, and their effects on the legitimacy and efficacy of those provisions.

#### SUPPLEMENTARY MATERIAL

Supplementary material for this article can be found at <https://doi.org/10.1017/S0043887tk>.

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<sup>1</sup> Following the Collins and Webster dictionaries, we define 'tutelage' as the state of being under the supervision or guardianship of a tutor.

<sup>2</sup> Collier 2011; Hall 2008; Bennet and Checkel 2015.

<sup>3</sup> See Farer 1996; Moravcsik 2000; Levitt 2006; Simmons et al. 2006; Hawkins and Shaw 2008; Duxbury 2013; Pevehouse 2005, 2016.

<sup>4</sup> Closa, Palestini and Castillo 2016.

<sup>5</sup> Whitehead 1986; Franck 1992; Dabène 2004.

<sup>6</sup> Pevehouse 2005.

<sup>7</sup> Mansfield and Pevehouse 2006; Ribeiro Hoffmann and Van Vleuten 2006; Legler and Tiekou 2011; Börzel and Van Hüllen 2015; Genna and Hiroi 2015.

<sup>8</sup> See Farer 1996; Moravcsik 2000; Hawkins and Shaw 2008; Levitt 2006; Simmons et al. 2006; Pevehouse 2005, 2016.

<sup>9</sup> Risse 2016; Börzel 2016.

<sup>10</sup> Meyer and Rowan 1977; Huntington 1991; Fox 1992; Franck 1992; Crawford 1993; Boli and Thomas 1999; Rich 2001; Marks 2011.

<sup>11</sup> Franck 1992.

<sup>12</sup> Meyer et al. 1997.

<sup>13</sup> Börzel and Van Hüllen 2015.

<sup>14</sup> Finnemore and Sikkink 1998; Donnely 1986.

<sup>15</sup> Franck 1992.

<sup>16</sup> Schimmelfennig 2003; Risse 2016.

<sup>17</sup> Elkins and Simmons 2005.

<sup>18</sup> Torfason and Ingran 2010.

<sup>19</sup> Checkel 1999; Risse 2000.

<sup>20</sup> Weifen and Orbie 2015; Bartels 2005, 2008; Fierro 2003.

<sup>21</sup> The first human rights and democracy clause appeared in the 1990 EEC–Argentina cooperation agreement at Argentina’s request. Similar provisions appeared in the agreements with Uruguay (1991); Paraguay (1992); Brazil (1992); the cooperation agreements with MERCOSUR (1995); Central America (1993 and 2003) and the Andean Pact (1993 and 2003).

<sup>22</sup> Coglianesi 2000; Koremenos et al. 2001.

<sup>23</sup> Goldstein 1998; Mansfield and Milner 1999; Mansfield, Milner and Rossendorf 2002; Pevehouse 2005; Mansfield and Pevehouse 2006; Genna and Hiroi 2015.

<sup>24</sup> Mansfield and Milner 1999: 605–6.

<sup>25</sup> Genna and Hiroi 2015.

<sup>26</sup> Pevehouse 2005; Mansfield and Pevehouse 2006.

<sup>27</sup> Ambrosio 2008; Whitehead 2014; Van Soest 2015.

<sup>28</sup> Pevehouse 2005; Whitehead 2014.

<sup>29</sup> Moravcsik 2000.

<sup>30</sup> Burges 2007, 2008; Flesmes et al. 2011; Teixeira 2012.

<sup>31</sup> Merke 2015.

<sup>32</sup> Vanderhill 2013.

<sup>33</sup> Levitt 2006 also develops a similar argument based on future expectations but applied to the enforcement of democracy clauses, and in the specific case of the OAS.

<sup>34</sup> Closa, Palestini and Castillo 2016.

<sup>35</sup> Mitchell and Keilbach 2001: 896

<sup>36</sup> Closa 2013; Closa and Cassini 2016

<sup>37</sup> Ribeiro Hoffmann and Van der Vleuten 2007; Hawkins and Shaw 2008; Van der Vleuten and Ribeiro Hoffman 2010; Ribeiro Hoffman 2015; see also Donno 2010.

<sup>38</sup> Moravcsik 2000

<sup>39</sup> Bennett and Checkel 2015.

<sup>40</sup> Collier 2011; Hall 2008; Beach and Pedersen 2013; Bennet and Chekel 2015.

<sup>41</sup> Hall 2008: 309.

<sup>42</sup> Bennet and Checkel 2015; Schimmelfennig 2015.

<sup>43</sup> Palestini and Agostinis 2015.

<sup>44</sup> Ribeiro Hoffman and van der Vleuten 2007; Van der Vleuten and Ribeiro Hoffmann 2010; Ribeiro Hoffmann 2016.

<sup>45</sup> Tansey 2007: 767.

<sup>46</sup> Hall 2008: 311.

<sup>47</sup> Tansey 2007

<sup>48</sup> Krippendorff 2004: 241.

<sup>49</sup> Dabène 2004; Malamud 2005.

<sup>50</sup> Closa, Palestini Céspedes and Castillo 2016.

<sup>51</sup> Sanguinetti 16:1 and 16:23; Lacalle 21:3; Valdés 26:29; Insulza 29:1.

<sup>52</sup> Lacalle 21:6, 21:9 and 21:32.

<sup>53</sup> According to Insulza, the EU also had a causal effect on the adoption of the OAS Resolution 1080. Insulza 29:6 and 29:7. Chile, however, was not part of Mercosur and despite its later adherence, Insulza's views do not convey an insider's view on the negotiations.

<sup>54</sup> Demands levelled by the Brazilian Social Democratic Party are the only limited exception in this case, Ferreira Simões; 23:2, 23:4, 23:8 and 23:12.

<sup>55</sup> Malamud 2003 and 2005; Gardini 2006; Gómez Mera 2013.

<sup>56</sup> Lacalle 21:3.

<sup>57</sup> Riggirozzi and Tussie 2012; Sanahuja 2012.

<sup>58</sup> See also Dabène 2004.

<sup>59</sup> Miola 19:23 and 19:24.

<sup>60</sup> Amorim 3:1; Lafer 11:1, 11:4, 11:5, 11:6 and 11:13; Sanguinetti 16:1, 16:2, 16:3, 16:5 and 16:20; Volonté 25:6; Padrón 28:10, 28:14 and 28:15.

<sup>61</sup> Lacognata 9:13; Pinheiro Guimaraes 14:9; Ramírez Lezcano 1:11; Amorim 3:3 and 3:4; Rachid 12:1; Pinheiro Guimaraes 14:8; Abreu 17:24; Bassols 30:5.

<sup>62</sup> Ramírez Lezcano 1:15; Lampreia 10:7; Rachid 12:6; Sanguinetti 16:19.

<sup>63</sup> Conde 5:11; Ruiz Díaz Balbuena 7:22 and 7:30; Raimondi 18:1, 18:3; Lara Castro 20:19; Padrón 28:12.

<sup>64</sup> Ons 8:4; Couriel 24:15 and 24:17; Volonté 25:4.

<sup>65</sup> Ruiz Díaz Balbuena 7:1; Rachid 12:6 and 12:15; Melgarejo 13:6, 13:17 and 13:22; Wasmosy 15:3; Lara Castro 20:16; and González Bibolini 27:23.

<sup>66</sup> Conde 5:25; Rachid 12:32; Raimondi 18:2; Lara Castro 20:15; Ferreira Simões 23:9.

<sup>67</sup> Conde 5:12 and 5:14; Miola 19:16.

<sup>68</sup> Conde 5:15, 5:17 and 5:46.

<sup>69</sup> Lacognata 9:8 and 9:9; Miola 19:12.

<sup>70</sup> Lacognata 9:5.

<sup>71</sup> Lara Castro 20:14.

<sup>72</sup> Abreu 17:24, 17:40; Volonté 25:4, 25:21, 25:19 and 25:14; Couriel 24:16, 24:14 and 24:13; Sanguinetti 16:21 and 16:22; Lafer 11:8 and 11:9; Lampreia 10:1 and 10:10; Miola 19:25.

<sup>73</sup> González Bibolini 27:23; Lara Castro 20:27; Megarejo 13:15; Rachid 12:1, 12:2, 12:9, 12:15 and 12:19.

<sup>74</sup> Lampreia 10:3.

<sup>75</sup> Abreu 17:12, 17:16 and 17:17; Lacalle 21:1, 21:10, 21:12, 21:13 and 21:18; Volonté 25:15 and 25:17. Surprisingly, A. Padrón argued that Ushuaia I served as protection for Uruguay 28:11.

<sup>76</sup> Valdés 26:27 and 26:29; Insulza 29:5.

<sup>77</sup> Conde 5:48; Couriel 24:14; Ons 8:4, 8:7 Salomone 2:21

<sup>78</sup> Exceptionally, Lara Castro 20:23.

<sup>79</sup> Salomone 2:22; Conde 5:15 and 5:49; Lacognata 9:16. Surprisingly, Chancellor Lara Castro from Paraguay excluded his own country as an addressee of Ushuaia II, directing it instead towards Bolivia and Ecuador. Lara Castro 20:26 and 20:27. The only outlier was an Uruguayan official who stated that there was no concern with Paraguay's democracy: Ons 28:29.

<sup>80</sup> Salomone 2:24; Valdés 26:30.

<sup>81</sup> Salomone 2:20, 2:24 and 2:25; Raimondi 18:7 and 18:5.

<sup>82</sup> Conde 5:46.

<sup>83</sup> Only one interviewee expressed this implicit belief: Conde 5:29, 5:30 and 5:43.

<sup>84</sup> Ferreira Simões 23:6 and 23:33; Lacalle 21:30.

<sup>85</sup> Conde 5:53; Lacalle 21:7 and 21:15; Valdés 26:31.

<sup>86</sup> Valdés 26:32.

<sup>87</sup> Ruíz Díaz Balbuena 7:29; Lujan 22:22.

<sup>88</sup> Bassols 30:2; 30:3; 30:4; Conde 5:56.

<sup>89</sup> Moravcsik 2000.

<sup>90</sup> Closa and Palestini 2015. See also for African regional organizations, Duxbury 2013.