

The International Dalit Solidarity Network
"Working globally against discrimination by work and descent"

Discrimination based on descent in Africa [1]

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1. Introduction

This paper is based upon research of existing materials of an ethnological and anthropological nature, as well as items from the media, papers written by non-governmental organisations (NGOs), websites and submissions to local, national and international commissions. I have restricted the material to cover those forms of discrimination which exist in Africa which rely entirely on the application of the descent limb of the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD). Without this aspect of the ICERD, the cases discussed below have no recourse to international human rights mechanisms to tackle the discrimination they suffer.

The first types of descent based discrimination I deal with are the caste systems that exist in areas of the Sahel, particularly West Africa, but also Somalia and the surrounding areas. These are systems of exclusion based on “occupational specialization of endogamous groups, in which membership is based on ascription, and between which social distance is regulated by the concept of pollution”[2]. This definition can be applied to many of the casted peoples, usually occupational specialists in blacksmithing, potting, barding, leatherworking, weaving and other craft professions, who form a small proportion of some communities across the Sahel from Gambia to Somalia. I also look at the Nigerian “Osu” system in this context as system often referred to as a “caste” system, and largely unique in its discriminatory basis.

Secondly, there is discrimination based on real or perceived descent from slaves. This is the case amongst some populations in West African countries whose borders encroach upon the Sahara, such as Mali and Mauritania, as well being a feature of many of the caste systems described above. Slave descent does not always denote discrimination in those areas where the system exists. However stigma is often attached to this group and they suffer discrimination in employment and political power, and tend to be endogamous.

The third and final form of descent based discrimination this paper covers is against the hunter-gatherer societies and their descendents. The Twa of Burundi and Rwanda and the Watta in Kenya exemplify how discrimination against hunters can marginalise and negatively stereotype an entire people, leading to severe restrictions on their ability to achieve equality and exercise their rights.

2. Caste discrimination- discrimination based on work and descent

Caste discrimination is widespread in parts of Sahelian Africa and particularly amongst certain communities in West Africa, as well as amongst the Somali and Ethiopian populations. Debates about the origins of the caste systems in Sahelian Africa, a subject too large to cover here, suggest that it is possible that caste systems were internally developed in one society, or a small cluster of areas, and was then spread through migration. Here, I identify three main, but not exclusive, areas where caste people are found in Africa and suffer discrimination based on (work and) descent, although their number are generally low as a percentage of the population. It is apparent from a cursory reading that there are many shared characteristics between these groups.

Furthermore, there are many common features which these systems share with the caste system of South Asia.

2.1 West African caste systems

Amongst anthropologists and ethnologists researching societies in West Africa it is generally accepted that there are hierarchical societies where people occupy a specific place dependent on their work and descent. This leads to certain groups among many West African populations suffering discrimination which can range from mild social segregation and forced endogamy to denial of rights, severe inequality and even violence. Countries in West Africa that have societies with hierarchical caste structures within their boundaries include Mali; Mauritania; Senegal; Gambia; Guinea; Guinea-Bissau; Ivory Coast; Niger; Burkina Faso; Cameroon; Ghana; Liberia; Sierra Leone; Algeria; Nigeria and Chad. Affected populations within these areas are the Wolof, Tukulor, Senufo, Minianka, Dogon, Songhay, Fulani, Moorish, Tuareg, Bobo, Bwa, Dan, Serer and most of the Mande-speaking populations (including the Bambara, Malinke and Khassonke)[3]. The nature, degree and effects of the discrimination which these peoples suffer are highly varied, and both geographically and culturally context-dependent. However, the existence of occupationally specialized endogamous groups who suffer from restrictions on commensality based on concepts of pollution, who are ascribed this position from birth and are therefore denied equal rights with the rest of the population, are common to all these peoples.

The caste peoples of West Africa tend to form a small part of the population and unlike South Asia they are the only people of caste in the society. This means talking of these societies as “caste” societies doesn’t necessarily reflect the reality of their social organisation. However, the existence of a section of people who suffer discrimination on the basis of their descent, and can be considered as a caste with a socially inferior position to the majority in society, brings them under the terms of the ICERD. In the stratification of these societies there are normally two other groups: the ‘nobles’ or ‘freeborn’ and the slaves (see section 3). The main occupational and descent groupings of the caste peoples can be classified as simply bards, blacksmiths and tanners or often as separate groups of blacksmiths, potters, bards/jesters, tanners and leatherworkers, woodworkers, weavers, brasscasters and other craft-caste specialisations. However, they are also often called upon to perform other tasks, which they may receive little, or no payment for, such as undertaking, message-bearing and certain ritual tasks including circumcision and excision.

2.1.1 Wolof society (Senegal)

One of the largest and most hierarchical societies where caste discrimination is to be found is amongst the Wolof of Senegal. Wolof society is divided into the Geer (freeborn/nobles), jaam (slaves and slave descendents) and the ñeeño (people of caste). The ñeeño are divided into various castes such as blacksmiths and leatherworkers, all of whom are traditionally seen to be of a low-rank in Wolof society and maintain this position from birth until death. The ñeeño are said to form roughly 10-20% of Wolof society.[4] The degree of discrimination which members of the ñeeño face is varied. Urbanisation and

migration have changed the occupational basis of castes, however, "the ideologies stay vivacious. The castes remain a taboo.... They will disappear with difficulty"[5].

Endogamy and restrictions on commensality remain the most visible signs of the segregation of the *ñeeño* from the rest of society. Human Rights Watch report that "a geer who marries someone from the lower castes may be ostracized"[6] and M. Sy Kalidou, in his submission to the Committee on the Elimination of All Forms of Racial Discrimination (CERD) on "Castes and the Rights of Man in Senegal", states that "lots of abortions and infanticides were the result of inter-caste love"[7]. Another reported case is that of N Oureye, a 27 year old Senegalese woman living in Paris, whose mother "threatened to commit suicide if I got married with him (a griot, a bard caste within the *ñeeño*)"[8]. These are not isolated incidents but rather examples of the segregation which *ñeeño* still face. This segregation is based on the concept of pollution, the members of the *ñeeño* being seen as polluting, because of their work and also inherently due to their descent. For instance, contact with griots, particularly through their sweat, is seen as particularly polluting, partially due to the extra tasks of circumcision, undertaking and midwifery which they have traditionally performed. Although many no longer do, the concept of pollution remains engrained.[9] Other forms of segregation include exclusion from key initiation societies, burial in separate cemeteries and refusal of right to bear arms. Traditionally, the Wolof also refuse burial to the griots, instead placing their bodies in the hollows of baobab trees.[10]

These traditional prejudices and discriminatory practices against *ñeeño* restrict their ability to gain positions of responsibility and power and effectively "ghettoise" the members of the castes within Senegal. Although the Senegalese constitution affirms the rights of all Senegalese to equal protection of the law and freedom from discrimination, all regardless of origin (i.e. descent or caste), discrimination against *ñeeño* continues. In July 2001 a Coalition of Senegalese NGOs organized a Workshop in Senegal, as a "First step to debate the problem of castes"[11], aiming to break the taboo on speaking about castes in Senegal and contribute to Senegal's participation in the World Conference against Racism. This has served to stimulate debate within the country about caste issues and their role in impeding the attainment and exercise of human rights for sections of the Senegalese population.

2.1.2 Mande-speaking areas

Similar to Wolof society, Mande-speaking areas of West Africa have social hierarchies based on caste. Mande speakers can be found in a variety of countries such as Senegal, Mali, Gambia, Guinea, Sierra Leone, Liberia, Ivory Coast and with geographical isolates in Benin, Ghana, Burkina Faso and Nigeria[12]. Traditional Mande society is split in a similar manner to the Wolof, between the Horonw (nobles/freeborn) and the Nyamakalaw (caste people) with a third category of jonow (slaves and their descendents). Caste categories amongst the Mande are generally broken down into three categories of the blacksmiths (often paired with female potters), bards and leatherworkers. However, the Nyamakalaw often undertake other specialised tasks as undertakers, healers and hairdressers. It is suggested that

Nyamakalaw make up roughly 5% of the population in Mande speaking areas.[13] Generally, they are considered by non-caste (Horonw) Mande as dirty or impure and there are enforced restrictions on inter-group sexual intercourse and marriage, sharing of food and entering of compounds. These restrictions are reinforced with the cultural weight of mythical stories of the Nyamakalaw's "fall from grace", often illustrated with an ancestor of the caste group breaking a taboo (mainly eating "impure" food) and his descendents becoming impure and casted forever. Although academics debate the degree to which discrimination exists on this basis in contemporary society, even those who reject caste as a category or reject notions that Nyamakalaw are seen as inferior admit that "only the Horonw can become leaders in society.....(and) Horonw would never live with the Nyamakalaw or admit to interacting with them in public"[14]

Due to these people's descent they have suffered endogamy, ascribed inferior social position and occupation and segregation regulated by concepts of pollution. However, little direct evidence describes the effects of the discrimination which they must face, and what evidence there is suggests that generalisations are not helpful. It is likely that the occupational aspects of castes are slowly fading under pressures of migration, urbanisation and new western-style methods of manufacturing. However, the social status of Nyamakalaw does not appear to have improved. This could severely restrict their ability to achieve equal rights in Mande speaking areas with the non-caste members of the population.

2.2.1 West Central Africa (Nigeria/Cameroon/Chad)

The existence of work and descent based discrimination in central Africa has been described in research based in the Mandara hills (Nigeria and Cameroon) and the Chad basin. It is said that about 13 of the 30 ethnic groups in the Mandara hills area are casted, and form only two separate groups: the farmers with a 90-95% majority and the blacksmiths and potters, numbering about 5-10%.[15] The blacksmiths and potters may also fulfil many of the other traditional caste roles such as leatherworking, weaving and undertaking, and other roles such as midwifery, castration and drumming.

There are straightforward similarities between these caste peoples, to those described above. Endogamy is practised, occupation and social status is ascribed from birth and concepts of pollution and impurity regulate contact between the caste and non-caste people, restricting commensality and creating conditions of discrimination. Blacksmiths and potters are viewed with a mixture of fear, awe, respect and distaste. However, negative views of caste people appear to be the norm, leading to severe restrictions on their ability to practice their rights. For instance, referring to blacksmiths amongst the Kapsiki ethnic group in the Mandara hills one researcher notes, "their social status is clearly inferior. The blacksmiths are despised by the melimu (farmers), in official matters they have no judicial competence, in political meetings their voice is never heard"[16]. Myths that re-enforce the concepts of pollution range from tales that the caste people's ancestors ate impure meat, to stories that tell of blacksmiths being descended from unions between humans and animals. Contact with the caste peoples is seen as polluting and

marriage is forbidden. The occupational task of arranging funerals is often undertaken by the caste peoples and adds to the sense of their pollution amongst the non-caste.

The segregation between the caste and non-caste varies in the region, and in some areas it appears that boundaries are breaking down with marriages between blacksmiths and farmers occurring. However, the norm appears to remain endogamy and caste distinctions remain a source of exclusion and discrimination for the people of caste. The fact that children of farmers will still not play with children of caste peoples at a mission school in the area, where caste is not officially recognised, reflects the on-going and deep-rooted nature of these prejudices[17].

2.3 East Africa

2.3.1 Somalia

In traditional Somali society there are a number of occupational and descent based “low caste” groups and sub-groups who have suffered discrimination and denial of equal rights by the members of other Somali clans. Often referred to as Sab, meaning “low caste”, the three main groupings are the Midigan, Tumul and Yibir[18]. These castes have no territorial, genealogical or ethnic foundation and make up about 1% of the population of Somalia. Traditionally they have been engaged in patron-client relationships with larger Somali “noble” clans.

Concepts of purity play a large part in discrimination against Sab Somalis. They are considered by other Somalis to have become impure (‘haraam’). The origins of the impurity are unclear but may be related to both the nature of their occupations, seen as polluting, and myths concerning their hunting and eating traditions seen as against Shahri’a precepts[19]. Negative stereotypes that suggest Sab clans have magical powers lead to them being viewed with mistrust and suspicion. Specialised occupational roles are ascribed, the Tumul traditionally being blacksmiths and the Yibir and Midigan being hunters and leatherworkers.

Traditional discrimination against Sab Somalis has taken many forms such as a restriction and denial of rights to own land, cattle and horses; no right to claim compensation for murder (diya), a right of all other Somalia clans; social segregation and enforced endogamy; denial of education; and restriction of employment to traditional or menial tasks. While these sources of discrimination are enduring, the Sab Somalis have also continued to face discrimination in the Somali diasporas and in refugee and Internally Displaced People (IDP) camps[20]. In terms of political representation, in Somaliland, an unrecognised secessionist area of Somalia, they continue to feel underrepresented with only one seat in the Parliament. After many Sab clans supported the Siad Barre dictatorship, with the promise of equality and emancipation, many have suffered re-doubled discrimination since his downfall.

Although many Somalis of all clans have suffered through the last decade of war, the Sab clans continue to face extreme forms of discrimination which sets them apart from other sections of Somalia and the Somali diasporas and act as an enduring obstacle to their attainment of civil, political, economic and social rights.

2.3.2 Ethiopia

There is considerable evidence of forms of discrimination based on descent in the south-western area of Ethiopia. There is debate as to what degree this represents “caste” discrimination, and it has been reported that occupational specialisation among these groups has been declining. However, it is unarguable that marginalisation of these descent groups still exists.

These groups in Ethiopia have been described as “occupational castes.....characterized by endogamy and also by specialization in one or more occupations considered unclean or degrading, they have been excluded from ordinary interaction with members of the host community.....”[21]. The occupational specialisations share much in common with similar caste groups in West and Central Africa, with the main jobs being tanning, potting, blacksmithing and weaving. The concept of pollution is present, with mythical backing based on stories of food transgressions of the caste people’s ancestors, used to enforce restrictions. There are also myths suggesting caste people’s descent is from a human animal union, and tales of a “fall from grace”. These myths have been characterised as “an ideological legitimization of oppression”[22]. The concept of the impurity of the castes is used to regulate the social distance between caste and non-caste people.

Forms of discrimination based on these concepts of impurity and distaste for the occupational role of the caste people vary. For the main part, caste people have restricted access to land due to their status, an extreme example being the ban on Awacho tanners and Smiths owning any land. They also suffer from segregation within villages, often severe enough to warrant their settling on the very outskirts of villages, such as the tanners among the Kafa people. The castes rarely have any political or judicial rights. Instead they are forced into entering client-patron relationships with non-caste people. They are denied a place in councils, assemblies and religious rites and are also not allowed to act as legal witnesses. They are offered different seats at weddings, buried in different cemeteries and are barred from entering a farmer’s compound. Endogamy is the norm. It is fair to say that “there was and remains clear marginalization of the non-farming occupational groups in political, economic and social terms”[23]

In recent years changes have been reported in the relationship between caste and farming groups, with a slight restriction on commensality and occupational specialisation. Once again, the effects of migration, urbanisation, education and secular and religious ideology have had their affect. However, endogamy and ascription of position in a social hierarchy is still strong. The concepts of pollution and myths vary according to locality, but are still used to enforce discrimination against caste people on the basis of their work and descent. “The social position of marginalised groups is still largely ascribed by

birth”[24]. The continued existence of marginalisation and discrimination against these groups on the basis of their descent prevents them from gaining equal rights within their community and country.

2.4 The “Osu” system in Nigeria

The “Osu” system in Nigeria occupies an almost unique space in descent-based discrimination in Africa. It is different to the dominant forms described above, which are hierarchical systems based on occupational specialisation of groups within society, but is still often referred to as a “caste” system. Osu people are those who were historically “owned” by deities amongst communities in Igboland, South-East Nigeria. They were dedicated and “sacrificed” to these gods as well as being forced to live on the outskirts of villages to be the target of any bad luck that might occur[25]. Being an Osu is a position that is ascribed at birth, based on descent. Today, Osu people are still discriminated against even though the system has been outlawed and their traditional roles abandoned.

The system has been called a form of “Apartheid”[26] as it enforces segregation of one section of a community on the basis of an inferior social position. The Osu and the other groups in these areas are of the same ethnic origins and physically appear to be from the same community. There is enforced endogamy of the Osu group, a taboo which when broken continues to lead to ostracism and mistreatment of the individuals and their children. The concept of pollution is used to enforce endogamy and severe restrictions on commensality. Osu are described as being impure and contact with them as contaminating. There is also a widely held belief that touching an Osu automatically turns you into an Osu[27].

The marginalization that the Osu suffer has severe implications for their attainment of rights and equality within their communities. The stigma prevents Osu holding positions of responsibility and restricts their freedom of social interaction. In extreme cases, violence has been used to reinforce the “caste system”, as was the case when in 1999 an Osu group attempted to resettle on other land to escape the discrimination. It is reported that other sections of the community killed one person, shot others, raped Osu women and burnt down their homes[28].

3. Other forms of discrimination based on descent in Africa

Forms of discrimination based on descent which do not fall so easily into the concept of “caste” as stipulated in point 1 are those largely on the basis of descent, with little or no socially ascribed occupational specialization. The two major categories to consider in this respect, that may still represent groups who otherwise do not fall under the terms of the ICERD, are those descendents of slaves and hunter-gatherer groups who find themselves marginalised within certain societies. This marginalisation may contain aspects of a purity-pollution dyad, as well as degrees of real or perceived occupational specialisation. In all cases those discriminated against find access to their civil, political, social, economic and cultural rights is severely restricted.

3.1 Slave descent

In Africa there exist today many people who are kept in conditions that have been described as slavery. Many more are in “virtual” slavery, unable to leave their “owner’s” employ for fear of reprisals and starvation. For a significant proportion of these people, their slavery is not a condition that has been created in their lifetime, but something that has been inherited from their ancestors. Other groups, while no longer slaves, continue to suffer discrimination and hardship due to their membership of ex-slave social groups. In short, they suffer discrimination based on their descent.

3.1.1 Mauritania

Mauritanian society has been described as a “closed” society, largely made up of three social groups. Firstly the majority ruling Arab-Berber population known as “white moors”(Bidan). A second group are the “black” Africans living nearer the border with Senegal, coming from diverse groups such as the Wolof and Soninkes. Many have ethnic ties to Mali and Senegal and are farmers. The third group are the Haratin, known as the “black moors”. The Haratin are made up of slaves and ex-slaves belonging to the Bidan. Although slavery has been outlawed in Mauritania, it has from one source been estimated that around 90,000 Haratin exist as slaves[29] and other estimates would add another 300,000 part-time and ex-slaves[30].

The continued existence of slavery in Mauritania is borne out by readily available testimony. One such example is personally reported by the escaped slave Moctar Teyeb. Teyeb reports his story of being born a Haratin slave to the dominant Bidan community. He was denied education, suffered physical violence, including having his arms broken at the age of 13 for insolence and worked as a slave for the family until he was able to escape[31].

Economic, political and social marginalisation of the Haratin in Mauritania is well reported. When in slavery they are denied education, employment other than in unpaid menial jobs, and many are not allowed to marry. Haratin identity remains strong and due to the existing social hierarchy in Mauritania it has been reported that “Haratins are often considered slaves and therefore have difficulties to hold political key positions”[32].

Discrimination based on descent continues to exist against the Haratin in Mauritania and its effects range from the creation of obstacles to achieving equality in the country to their continued enslavement.

3.1.2 The Tuareg peoples (Mali, Niger, Algeria, Libya, Burkina Faso)

The Tuareg are to be found largely in Burkina Faso, Mali and Niger and are traditionally a nomadic people of pastoralist and trading occupations. A rigid caste system operates in Tuareg society that is largely between the nobles, freemen and slaves (Bellah). Slaves were traditionally raided from neighbouring peoples, but now are generally descendents of these people.

Slavery has been outlawed in the countries where Tuareg live. However, in the more remote areas slavery of the Bellah still persists. The Bellah are traditionally occupied by their “owners” as unpaid manual labourers,

producing goods such as salt, which the “owners” then trade. There is evidence of movement over time between the castes, some of the Bellah reaching a “higher” level. However, based on their descent, the Bellah remain slaves to their masters. This has become an ascribed social position, determined by birth and also enjoys a great degree of acceptance as a “natural” state of affairs amongst slaves and “owners” alike.

Some people have described the Bellah as a “traditional indentured servant caste”[33], as they have not been “forced” into slavery. However, the existence of local NGOs that are working against this practice suggests that not all Bellah are willing to accept this situation.

3.1.3 Slavery in West African societies with castes

As has been mentioned above, many West African societies have a three-tier hierarchy with freemen/nobles at the top, caste peoples at the bottom and slaves and their descendents as a third category. The slave “caste” is nominally at the bottom of the social hierarchy, and is usually made up of people raided from neighbours, although this practise is now illegal and has all but finished in most areas. It is interesting to note that usually caste people are not allowed to be taken as slaves in these raids.

Although the first generation of slaves are likely to have been treated as such and made to undertake the manual labour of the freemen, succeeding generations have found that their identity as slaves has either disappeared or become unimportant. On the whole it is probable that mild forms of discrimination may occur on the basis of their slave descent, in some societies, but as time passes intermarriage occurs and they are able to attain a position similar or identical to that of the freemen. The exceptions outlined above may not be the only cases where slaves and their descendents suffer discrimination and/or continued slavery based on their descent, but the situation of slave descendents in those societies mentioned in point 2 appears to be much less severe. However, this cannot be taken for granted and more research is important to acquire a level of evidence necessary to suggest slavery in these societies has ended.

3.2 Discrimination against hunter-gatherer groups and their descendents

Many contemporary African societies make distinctions between their farming or urban populations and the continued existence of hunter groups. Since colonisation, the practice of hunting has steadily been outlawed in many areas. However, the descendents of these groups continue to suffer from discrimination based on their descent.

3.2.1 The Watta of Kenya

The Watta community of Kenya live among the Boran, number around 2000-3000[34] and have traditionally been hunter-gatherers. The dominant Boran are generally herders and have traditionally treated the Watta as “unwanted, low caste, worthless and downtrodden”[35]. This form of stigma has led to their segregation and enforced endogamy, as well as socio-economic and political discrimination.

The traditional situation of a strict hunter-herder separation may no longer exist, but the discrimination of the Watta on the basis of their descent continues. They are the poorest group in the district, and as such are less able to afford education. When they are able to achieve education, they find that they are discriminated against in employment due to their Watta descent. As politics in the area are determined by a group's numerical weight, ethnicity and access to resources, the Watta have little representation or leverage. Even in employment that might be seen as "traditional" for the Watta, such as game keepers, they are entirely unrepresented.

Due to the Watta being of hunter-gatherer descent, they find themselves discriminated against and marginalised within their own local communities and as such are kept in an inferior position where their attainment of rights as equals is severely impaired.

3.2.3 The Twa in Rwanda (also Burundi, Democratic Republic of Congo and Uganda)

The three main groups in Burundi and Rwanda are the Hutu, Tutsi and Twa. In the past, Rwandan society has been depicted as a "caste" society, with the three endogamous groups forming a social hierarchy with specialized occupational roles[36]. This view has generally been discredited on the basis that the Hutu and Tutsi are not as rigid a categories has been previously suggested, with movement occurring between the two, and also on the basis that there it is ethnic differences that have led to the occurrence of separate groups, not occupational specialization itself. Without entering into these debates, it is important to recognise that the Twa, due to their numerical "insignificance" (only 1-2% of the population), their position at the very bottom of any social hierarchy and the general discrimination they continue to suffer due to their descent from hunter-gatherer societies, may fall into the descent limb of the ICERD.

The Twa have generally been hunters, potters and jesters in Rwandan society, suggesting a connection with the caste systems described in point 2. However, due to deforestation and modern methods of pot making, they have been left particularly vulnerable. They are among the pygmy peoples of Africa but not easily distinguishable from the Hutu or Tutsi populations of the area they occupy. Often described as tribe, but generally recognised as a caste, they have suffered discrimination and segregation from both Hutu farmers and Tutsi nobles. The concept of pollution is widely recognised as regulating the social distance between the Twa and the other members of societies where they live, with access to public wells and ownership of land and valuables being forbidden. Reports have even been made that Twa have been wounded and killed due to their breaking these taboos[37].

Due to the discrimination against Twa in Rwanda, coupled with their small numbers, they have little or no representation in positions of authority or power. "Twa people are ignored in this country and marginalised. There are two Twa in the university, few in the army, but apart from them — no governor, no administrator, not even a chief of the hill." [38] During the

Genocide of 1994 they also suffered badly, being targeted by both sides and probably lost 20% of their numbers, with another 20% fleeing the area[39].

The Twa have been recognised by many as the indigenous inhabitants of the area, but this is still debated. However, what is obvious is that they suffer greatly due to their perceived lower position in an ascribed social hierarchy, and that they suffer this discrimination due to their descent.

Footnotes:

[1] It should be noted that although this paper aims to cover the main indigenous forms of descent based discrimination in Africa, with examples, it cannot be considered as exhaustive

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[23] This quote and much material from this paragraph are taken from A.
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