



HOUSE OF LORDS

Library Note

Second Chambers

This Library Note looks at bicameral legislatures in other parts of the world and provides an overview of some of the features of other second chambers, and how these compare to the current House of Lords. The Note is intended as a short reference guide, and looks at the size of the second chambers; membership terms; and methods of selecting members. The Note concludes with a brief discussion of the powers of second chambers.

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I. Introduction

In recent years, the issue of House of Lords reform has been the subject of much debate in Parliament and in the media. The [House of Lords Reform Draft Bill](#) was published in May 2011, and the [House of Lords Reform Bill](#) (HC Bill 52 of session 2012–13) was introduced into the House of Commons in June 2012.¹

The UK is not the only country to have recently considered reform of its second chamber. In October 2013, voters in the Republic of Ireland rejected a Government proposal to abolish Seanad Éireann, the Upper House of the Irish Parliament,² while in Canada reform of the Senate has been proposed on numerous occasions,³ the most recent proposals from Stephen Harper, Canadian Prime Minister, being delayed pending a Canadian Supreme Court decision.⁴

The importance of using other second chambers as a source of information has been recognised. For example, giving evidence to the House of Commons Political and Constitutional Reform Select Committee in May 2011, Nick Clegg, Deputy Prime Minister, drew on international comparisons to support his point of view:

I think if you look at bicameral systems in many other parts of the world, they manage to retain their relationship of clear supremacy for one chamber over another, even though the subservient chamber, if I can put it that way, has its own democratic mandate.⁵

However, in an analysis of debates on Lords reform that took place during this period, Meg Russell argued that some misconceptions exist about the experience of second chambers around the world.⁶

This Library Note looks at bicameral legislatures in other parts of the world and provides an overview of some of the features of other second chambers, and how these compare to the current House of Lords. The Note is intended as a short reference guide, and looks at the size of the second chambers; the length of membership terms; and methods of selecting members. The Note concludes with a brief discussion of the powers of second chambers.

Comparative research on second chambers has received relatively little attention, with many studies focussing on individual second chambers, rather than examining them comparatively.⁷ The book *Reforming the House of Lords: Lessons from Overseas* (2000) by Meg Russell sought to address this deficiency and provided a comprehensive global overview of second chambers, reviewing in depth second chambers in seven countries. Second chambers were also discussed

¹ The House of Lords Reform Bill received its second reading in the House of Commons on 9 and 10 July 2012; for more information see House of Commons Library, [House of Lords Reform Bill 2012–13: Decision Not to Proceed](#), 25 September 2012, SN06405.

² BBC, [‘Seanad Vote: Public Vote to Keep Irish Senate’](#), 5 October 2013.

³ For more detail see Library of Parliament (Canada), [Reforming the Senate of Parliament—Frequently Asked Questions](#), 12 September 2011.

⁴ *The Globe and Mail*, [‘Canadians Want An Elected Senate, Harper Says After Trudeau Boots Senators’](#), 29 January 2014.

⁵ House of Commons Political and Constitutional Reform Select Committee, [Minutes of Evidence: The Coalition Government’s Programme of Political and Constitutional Reform](#), 12 May 2011, Q148.

⁶ See Meg Russell, ‘Elected Second Chambers and Their Powers: An International Survey’, *Political Quarterly*, January–March 2012, vol 83 no 1, pp 117–29.

⁷ Samuel C Patterson and Anthony Mughan, ‘Fundamentals of Institutional Design: The Functions and Powers of Parliamentary Second Chambers’, in *The Journal of Legislative Studies*, 2001, vol 7 no 1, p 39.

in her recent book, *The Contemporary House of Lords: Westminster Bicameralism Revived* (2013), which examined the relative powers of second chambers around the world and how this related to their composition.⁸

For a more detailed discussion of issues affecting second chambers around the world, the sources mentioned above are useful and, in particular, the broad range of information provided by the [Constitution Unit](#) at University College London.⁹

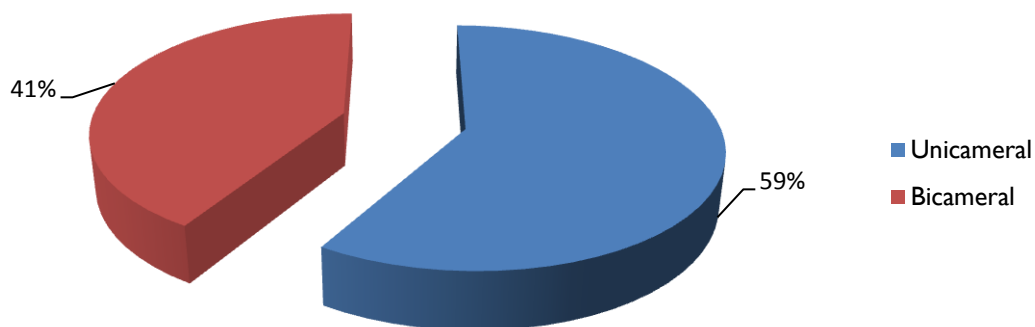
2. Unicameral Compared to Bicameral Legislatures

The [Parline](#) database of the Inter-Parliamentary Union (IPU) provides an up-to-date source of information on national legislatures. The IPU provided the following definition regarding the structures of Parliament:

Parliament is either unicameral (composed of a single parliamentary chamber) or bicameral (composed of two parliamentary chambers).¹⁰

Identifying which countries have legislatures that can be considered bicameral is not a straightforward task.¹¹ In January 2014, the IPU recognised 189 countries where national legislatures exist, with 78 bicameral and 111 unicameral legislatures. Appendix I of this Note contains a list of all bicameral parliaments that the IPU details.¹²

Figure 1: Bicameral and Unicameral Legislatures



Source: IPU Parline database, accessed 28 January 2014.

The number of bicameral legislatures recorded can change, according to both the number of national parliaments deemed to exist by the IPU, and because of changes in the structure of

⁸ See in particular pp 41–66. This topic was also explored in Meg Russell, ‘Elected Second Chambers and Their Powers: An International Survey’, *Political Quarterly*, January–March 2012, vol 83 no 1, pp 117–29.

⁹ This Note draws on the comprehensive work on the subject of second chambers carried out by Meg Russell and the UCL Constitution Unit.

¹⁰ Inter Parliamentary Union [Parline](#) database.

¹¹ In his article, ‘How many bicameral legislatures are there?’, *Journal of Legislative Studies*, 2004, vol 10 no 4, pp 1–9, Lord Norton of Louth highlighted the difficulties in defining whether a legislature can be seen as bicameral or unicameral, using as examples the situations in Botswana, Iran and the European Union.

¹² In her book, *The Contemporary House of Lords: Westminster Bicameralism Revived* (2013, p 65), Meg Russell queried the inclusion of Yemen and Ethiopia as bicameral legislatures in the IPU calculations, stating the number of bicameral institutions as at 2013 was 76. The IPU figures include Burkina Faso as a unicameral legislature, as stated in the Parline database. Although a new upper chamber, known as the Senate, was agreed in May 2013, there have been protests regarding its creation and, as at January 2014, it was not in existence.

legislatures; for example, in Tunisia a second chamber was created in 2005, while New Zealand moved to a unicameral structure with the abolition of its second chamber in 1950.¹³

The choice of parliamentary structure can be influenced by several factors. Bicameralism tends to be adopted by larger and more populous states and is more common in federal states, but can be found in regimes associated with both parliamentarism and presidentialism.¹⁴

Of the 78 bicameral legislatures identified by the IPU in January 2014, 54 of the second chambers or 69 percent were known as ‘Senates’,¹⁵ with one National Assembly,¹⁶ seven ‘Houses’,¹⁷ four councils of the states,¹⁸ four national councils,¹⁹ two federal councils²⁰ and six other ‘councils’.²¹

3. The Size of Second Chambers

The size of the House of Lords, when compared to other second chambers around the world, is also something that has been much discussed over the years. On 28 January 2014, the House of Lords had 779 members,²² a figure that excluded [ineligible members](#) of the House, who make up a further 56 members.²³

According to the Parline database at January 2014, the number of members of second chambers could be broken down as follows.²⁴

¹³ The New Zealand second chamber, the Legislative Council, ceased to exist on 1 January 1951.

¹⁴ Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*, 2013, p 47.

¹⁵ This figure includes the federal senate of Brazil, the Liberian Senate of Liberia and the Chamber of Senators in Bolivia.

¹⁶ Tajikistan.

¹⁷ This figure includes the House of Councillors in Japan, the House of Councillors in Morocco, the House of Elders in Afghanistan, the House of Lords in the United Kingdom, the House of Nationalities in Myanmar, the House of Peoples in Bosnia and Herzegovina, and the House of Federation in Ethiopia.

¹⁸ India, South Sudan, Sudan, and Switzerland.

¹⁹ Bhutan, Namibia and Slovenia. This figure also includes the National Council of Provinces found in South Africa.

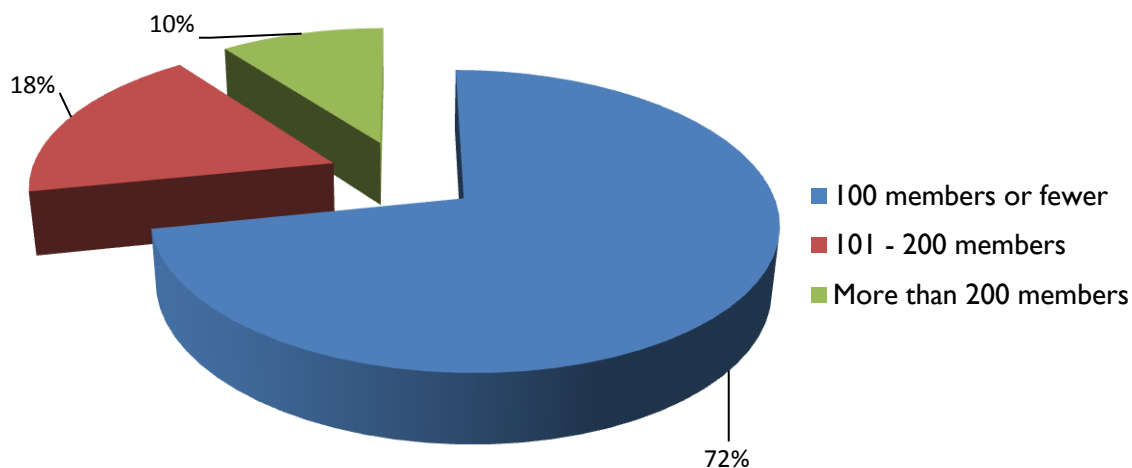
²⁰ Austria and Germany.

²¹ This figure includes the Consultative Council in Yemen, the Council of Federation in the Russian Federation, the Council of the Nation in Algeria, the Council of the Republic in Belarus, the Shura Council in Bahrain and the State Council in Oman. These figures are based on the English translation of the names of second chambers as determined by the IPU.

²² These figures are taken from House of Lords Information Office [statistics](#), accessed 28 January 2014.

²³ The number of House of Lords members reported by Parline varies slightly from the House of Lords Information Office figure. Parline suggests that there are 760 members in the House of Lords, compared to the 779 reported by the House of Lords Information Office. This reflects the more up-to-date information collected by the House of Lords Information Office and the changing size of the House of Lords membership which, unlike many other second chambers, is not capped. Nevertheless, figures in the Parline database provide a useful overview of sizes of international second chambers.

²⁴ The Parline database includes figures for both the statutory number of members and the current membership. These figures use the statutory membership figures as reported by Parline.

Figure 2: Size of Second Chambers Around the World

Source: IPU Parline database, accessed 28 January 2014.

As figure 2 above highlights, the majority of second chambers, 56, are made up of 100 members or under, with only eight having more than 200 members; 14 chambers have between 101 and 200 members. The House of Lords is the largest second chamber in the world.²⁵

The House of Lords is also unusual in its size in relation to the lower house it is linked to, the House of Commons. According to the IPU, the House of Lords is the only upper house in the world which is larger than the lower house to which it is linked. The IPU data shows that Oman and Bahrain are the most similar to the House of Lords in this respect; Bahrain had the same number of members in the lower and upper chambers (40), while Oman was reported to have one less member of the upper house than the lower (83/84).

Table I: Relative Size of the Upper and Lower Chambers

Size of Second Chamber	Number	Country
Less than half the size of the lower chamber	50	Philippines, Sudan, Germany, South Sudan, Brazil, Dominican Republic, Kenya, Democratic Republic of the Congo, Poland, South Africa, United States of America, Switzerland, Ethiopia, Mexico, Lesotho, Bolivia, Argentina, Zimbabwe, Thailand, Nigeria, Haiti, Pakistan, Algeria, Uruguay, Malaysia, Chile, Rwanda, Jamaica, Namibia, Austria, Canada, Bosnia and Herzegovina, Ireland, Yemen, Russian Federation, Mauritania, Burundi, Czech Republic, Belize, Afghanistan, Liberia, Bahamas, Romania, Kazakhstan, Slovenia, India, Madagascar, Swaziland, Belgium, Cambodia

²⁵ It should be noted that the size of the United Kingdom's House of Commons is also quite large in international terms. Only one other country, Italy, has over 600 members of the lower house, with 51 countries having chambers with less than 300 members.

More than half the size of the lower chamber	26	Jordan, Netherlands, Japan, Australia, Myanmar, Italy, Congo, Bhutan, Tajikistan, Cameroon, Paraguay, Belarus, France, Saint Lucia, Colombia, Uzbekistan, Morocco, Barbados, Trinidad and Tobago, Equatorial Guinea, Spain, Palau, Gabon, Grenada, Antigua and Barbuda, Oman
Same size as the lower chamber	1	Bahrain
Larger than the lower chamber	1	United Kingdom

Source: IPU Parline database, accessed 28 January 2014.

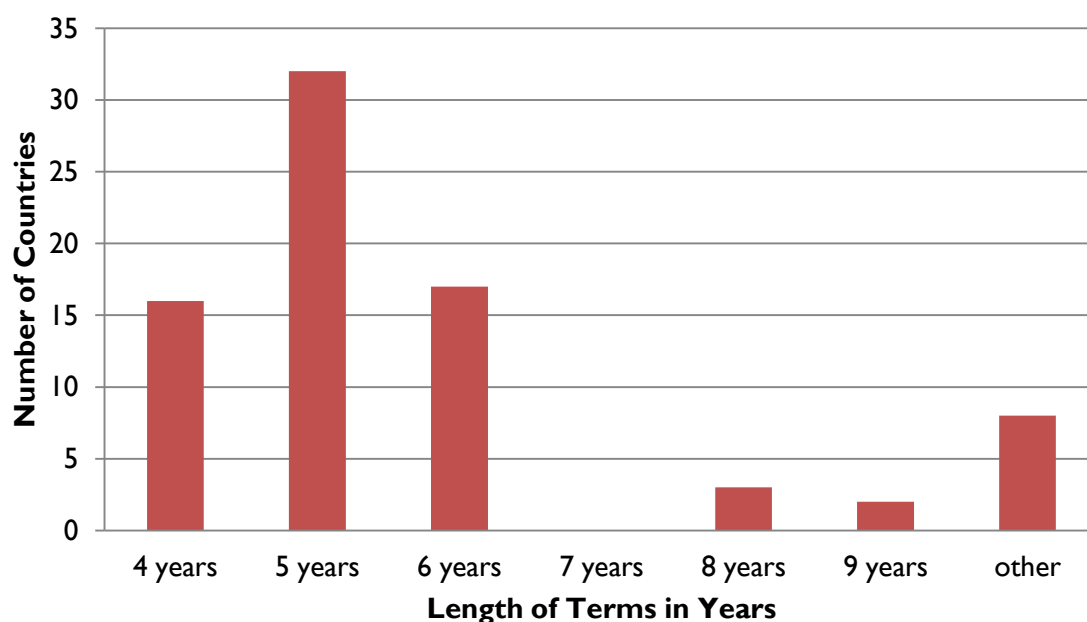
Appendix 2 of this Note provides a detailed breakdown of the figures.

4. Membership Terms

Many second chambers have a limit on the amount of time an individual can be elected or appointed. In many cases these time limits apply through parliamentary terms, with a common term length being five years. In some countries, members' terms are unlimited, for example appointed members in the Italian Senate are appointed for life;²⁶ this is similar to the situation in the United Kingdom. Alternatively, in Canada members of the Senate retire at the age of 75.

Figure 3 below shows, where applicable, the length of terms of membership in second chambers around the world.

Figure 3: Length of Terms of Membership



Source: IPU Parline database, accessed 28 January 2014.

²⁶ The Italian Senate is predominantly made up of directly elected members, with a small number of appointed members, made up of life appointments by the President, and ex-presidents of the Republic who are entitled by right to sit in the Senate.

In a number of cases, members of the upper house serve longer terms than their lower house colleagues, as shown in Appendix 3 of this Note. A comparison of the membership term in the lower house and upper house for the 78 bicameral countries identified by the IPU shows that in nearly 30 percent, members of upper house have longer terms than members in the lower house; and 60 percent have the same terms as the lower house. In the remaining 10 percent of cases the terms vary, although having a term in the upper house which is shorter than the lower house is rare.²⁷

In the eight countries marked as ‘other’ in figure 3, members do not have set terms for membership of the second chamber or have terms which vary according to individual countries’ circumstances.²⁸ For example, in Austria, terms can be either five or six years depending on the province which a member represents; in Canada, members retire at 75, significantly longer than the lower house’s terms; and in the United Kingdom, membership is for life, with the exception of the Lords Spiritual.

In countries where the terms of a member of the second chamber are longer than those of the lower house, it is common for a partial renewal of members to take place during the term of the house. This can be seen in France (senators are elected for a six-year term and half of the house is renewed every three years)²⁹ and in the United States of America (senators are elected for a six-year term with a one-third renewal every two years).

5. Methods of Selecting Members

The issue of how members of a second chamber should be selected received considerable interest in recent debates regarding House of Lords reform.³⁰ Second chambers around the world offer a diverse range of examples of selection methods, varying from wholly elected to wholly appointed chambers and those chambers which include a mixture of both.

The IPU database indicates the electoral system for the 78 bicameral legislatures which it has identified. It suggests that eleven second chambers have proportional electoral systems, 28 have majority electoral systems, six have mixed electoral systems and 33 have ‘other’.³¹ However, within these broad categories the situation is more complex. For example, while the IPU records Belgium as having a proportional electoral system, this does not mean that this chamber is wholly elected. In fact, as the detail of the IPU database indicates, the second chamber in Belgium includes 40 directly elected members (on a proportional party list system), 21 members designated by the Community Parliaments and ten co-opted members. In addition, children of the Monarch over 18 years old are ex officio Senators.

²⁷ For example, members of the House of Elders in Afghanistan serve three, four or five year terms, depending on how they were elected, rather than the five year terms seen in the lower house. See Appendix 3 of this Note for details.

²⁸ The eight ‘other’ systems of membership include Austria, Germany, Canada, the United Kingdom, the Russian Federation, Malaysia, Yemen and Afghanistan. Details can be found in Appendix 3 of this Note.

²⁹ In 2003, France enacted laws to reduce the length of terms for members of its Senate from nine years to six years. This was implemented in full by 2011, which saw elections for senators held every three years to renew half the House (not a third as in the pre-reform system) and increased the number of Senate members.

³⁰ For more details see Joint Committee on the Draft House of Lords Reform Bill, [Draft House of Lords Reform Bill](#), 23 April 2012, HL Paper 284-I of session 2010–12, pp 27–30.

³¹ The ‘other’ category includes a range of different second chambers. For example, in the Irish Senate most members are elected indirectly to represent vocational panels, with three members each elected by the National University of Ireland and the University of Dublin and some members appointed by the Prime Minister.

In her book, *The Contemporary House of Lords: Westminster Bicameralism Revived* (2013), Meg Russell provided a detailed breakdown of the composition of international second chambers, which is recreated, with minor amendments, in table 2 below.³² This analysis captures where chambers are directly or indirectly elected, appointed, hereditary or based on a mixed membership.

Table 2: Existing National Second Chambers, by Composition and Political Structure

	Parliamentary (33)	Presidential (41)
Wholly directly elected (21)	Australia, Czech Republic, Japan, Romania, Switzerland (5)	Argentina, Bolivia, Brazil, Chile, Colombia, Dominican Republic, Haiti, Liberia, Mexico, Nigeria, Palau, Paraguay, Philippines, Poland, United States of America, Uruguay (16)
Wholly indirectly elected (15)	Austria, Bosnia and Herzegovina, France, Germany, Netherlands, Pakistan, Slovenia, South Africa (8)	Congo, Gabon, Mauritania, Morocco, Namibia, Russian Federation, Sudan (7)
Majority directly elected, minority indirectly elected (2)	Spain, Thailand (2)	
Majority directly elected, minority appointed (3)	Italy (1)	Bhutan, Burma (2)
Majority directly elected, plus indirectly elected, appointed and hereditary (2)	Belgium, Zimbabwe (2)	
Majority indirectly elected, minority appointed (12)	Cambodia, India (2)	Afghanistan, Algeria, Belarus, Burundi, Democratic Republic of Congo, Kazakhstan, Madagascar, Rwanda, Tajikistan, Uzbekistan (10)
Majority indirectly elected, plus directly elected and appointed (1)	Ireland (1)	
Wholly appointed (13)	Antigua and Barbuda, Bahamas, Barbados, Belize, Canada, Grenada, Jamaica, Saint Lucia, Trinidad and Tobago (9)	Bahrain, Jordan, Oman, South Sudan (4)
Majority appointed, minority indirectly elected (3)	Malaysia (1)	Senegal, Swaziland (2)

³² The table includes details of 74 bicameral legislatures. This figure is made up of the 76 bicameral legislatures that Meg Russell identified (Ethiopia and Yemen are categorised as unicameral), but excludes details of Tunisia and Greece whose Parliaments were suspended at the time when the data was researched. The data also includes details of Madagascar which since the time of writing (2013) moved from an appointed higher transitional council to a Senate made up of indirectly elected and appointed members.

Majority appointed, minority hereditary (1)	United Kingdom (1)	
Majority hereditary, minority appointed (1)	Lesotho (1)	

Source: Based on table by Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*, 2013, p 51.

As the table highlights, 21 national second chambers, that is 28 percent, are wholly directly elected.³³

Indirect election refers to chambers in which members are chosen by a body or bodies which have themselves been elected; examples include India and South Africa where second chamber members are chosen by members of sub-national legislatures. Table 2 highlights that 15 second chambers are wholly indirectly elected, with a further 20 which include some indirectly elected members.

In total 38 chambers, or 51 percent, are wholly elected—either by direct election, indirect election or a combination of both.

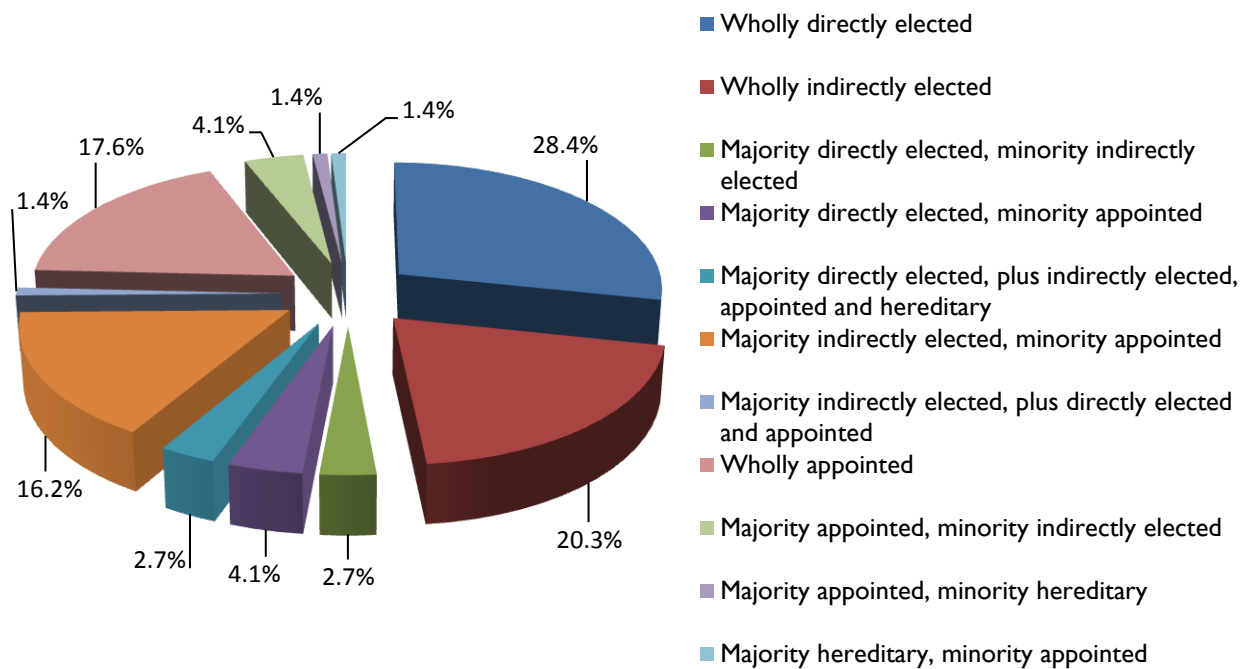
Table 2 also shows 13 wholly appointed second chambers, which include several directly influenced by the example of the House of Lords; for example, the Senate of Canada, which is appointed by the Canadian Prime Minister. In total, table 2 shows 15 second chambers which include no elected members³⁴ and a further 21 with some unelected members. Table 2 also shows that the hereditary membership is included in 4 second chambers—Belgium, Lesotho, Zimbabwe and the United Kingdom.

As the table shows, approximately a third, 25 second chambers, consist of a combination of different membership types. In addition, within memberships which are wholly elected or appointed there may be a mixed membership. For example, the second chamber in Morocco, which is wholly indirectly elected, contains a mixture of members chosen by a combination of territorial and vocational groups.

Figure 4 below uses this data to provide a snapshot of second chambers by membership type.

³³ Where direct election for both chambers exists, many countries employ several measures to ensure the second chamber remains distinct from the first. For example, different electoral systems are often used for the upper and lower chambers, while second chamber members are often elected in portions, rather than all being chosen on a single day. Different membership restrictions for upper and lower chamber members can also be applied; the age qualification for second chamber members is often higher, and in some cases the franchise of chambers also differs. In Italy, for example, those voting for the Senate must be at least 25, while lower house voters only need to have reached 18 years of age.

³⁴ Chambers are either wholly appointed or are mainly appointed, but contain additional hereditary members.

Figure 4: Composition of Existing National Chambers

Source: Based on figures from Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*, 2013, p 51.

6. Powers

Comparing the different powers that second chambers can employ is not a straightforward exercise. Comparing the formal powers of a chamber, those written down in constitutions and other documents, can belie the extent to which those powers are actually used.³⁵

In *The Contemporary House of Lords: Westminster Bicameralism Revived* (2013), Meg Russell provided an analysis of formal powers of national second chambers, breaking these down by the chamber's composition and the powers of the lower house to override decisions of the upper house; this is recreated in table 3 below.³⁶

³⁵ The issue of 'perceived' legitimacy and how this impacts upon a second chamber's use of its formal powers is explored in Meg Russell, 'Rethinking Bicameral Strength: A Three-Dimensional Approach', *The Journal of Legislative Studies*, 2013, vol 19, no 3, pp 370–91.

³⁶ As with table 2, this table is based on information from Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*, 2013, p 54. The table includes details of 73 bicameral legislatures and excludes Ethiopia and Yemen, which Dr Russell considers to be unicameral, and Tunisia and Greece whose parliaments were suspended at the time the data was researched. Madagascar has also been removed due to its recent replacement of the Higher Transitional Council with a Senate.

Table 3: Second Chambers by Composition and Lower House Override Powers

	Wholly or Largely Elected (55)	Wholly or Largely Unelected (18)
No override power (25)	<i>Algeria*</i> , <i>Argentina#</i> , <i>Bosnia and Herzegovina</i> , <i>Brazil</i> , <i>Chile##</i> , <i>Colombia*</i> , <i>Dominican Republic</i> , <i>Germany*</i> , <i>Haiti*</i> , <i>Italy</i> , <i>Kazakhstan</i> , <i>Liberia</i> , <i>Mexico</i> , <i>Netherlands‡</i> , <i>Nigeria</i> , <i>Palau</i> , <i>Philippines*</i> , <i>Rwanda*</i> , <i>Sudan#</i> , <i>Switzerland*</i> , <i>United States of America*</i> , <i>Zimbabwe</i> (22)	Canada, United Kingdom (Lords Bills only), South Sudan# (3)
Joint sitting (A = by absolute majority, 2/3 = by 2/3 supermajority) (11)	<i>Australia(A)†</i> , <i>Bhutan</i> , <i>Bolivia(A)</i> , <i>Burma</i> , <i>India</i> , <i>Pakistan</i> , <i>Romania*</i> , <i>Uruguay(2/3)</i> (8)	Bahrain, Jordan, Swaziland (3)
Supermajority (all 2/3 except where stated) (9)	<i>Belarus*</i> , <i>Burundi*‡</i> , <i>Japan</i> , <i>Namibia#</i> , <i>Paraguay#</i> , <i>Russian Federation*</i> , <i>South Africa*</i> , <i>Tajikistan</i> , <i>Uzbekistan*</i> (9)	
Absolute majority (9)	<i>Afghanistan*</i> , <i>Austria</i> , <i>Cambodia</i> , <i>Czech Republic</i> , <i>Morocco*</i> , <i>Poland</i> , <i>Slovenia</i> , <i>Spain</i> , <i>Thailand*</i> (9)	
Normal majority (18)	<i>Belgium‡</i> , <i>Congo*</i> , <i>Democratic Republic of Congo*</i> , <i>France*</i> , <i>Gabon*</i> , <i>Ireland</i> , <i>Mauritania*</i> (7)	Antigua and Barbuda, Bahamas, Barbados, Belize, Grenada, Jamaica, Lesotho, Malaysia, Saint Lucia, Senegal, Trinidad and Tobago (11), plus United Kingdom (Commons Bills only)
Legislative power not specified in constitution (1)		Oman (1)

Notes: Italics denotes wholly or mostly *indirectly* elected, others wholly or mostly directly elected.

* Conciliation process between the chambers includes use of a joint committee.

Argentina: Rejection of a bill cannot be overridden. On amendments, 2/3 upper house majority may only be overridden by 2/3 lower house majority. Chile: A 2/3 upper house majority cannot be overridden. Namibia: Ordinary lower house majority overrides, except where second chamber vetoes a bill completely and by 2/3 majority, when 2/3 lower house majority required to override. Paraguay: If the originating chamber re-passes its bill with an absolute majority, it may only be overridden by the revising chamber with a 2/3 supermajority. Sudan and South Sudan: Chamber only sees legislation affecting the states, which if approved by 2/3 majority goes straight for enactment.

† Australia: Joint sitting can only be held after an emergency general election dispute.

‡ Netherlands: Cannot amend bills, can only vote to reject or approve; rejection rarely used. Belgium, Burundi: Can amend only, not reject bills.

Source: Based on table by Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*, 2013, p 54.

Table 3 above shows the differences between second chambers when considering ‘ordinary’ legislation.³⁷ The table identifies countries where the lower chamber has no override power on ordinary legislation, that is where the second chamber has an absolute veto over legislation and a bill cannot become law without its consent. It also details where second chambers can be overruled; for example, in several countries disputes between the two chambers must be resolved by a joint sitting of both chambers together, often through an absolute or supermajority. Given that in many countries the lower chamber has more members, this will often work in the lower chamber’s favour. Alternatively, in over half of countries the second chamber may be overridden by a vote in the first chamber; this can be through a supermajority, an absolute majority or, as in the case of the House of Lords with respect to House of Commons bills, a simple majority.

As table 3 shows, lower chambers with no override power on ordinary legislation are more common in countries with presidential systems, such as the United States and Brazil. In addition, there appears to be a clear link between the mode of composition of a chamber and its powers, with elected second chambers dominating the more powerful upper rows of the table and unelected chambers largely being seen in the lower rows of the table.

The table does not highlight where second chambers have the power of delay with regard to a decision from the lower house, that is, how long a second chamber without an absolute veto can delay a bill before its decision is overridden by the lower house. Here, the House of Lords’ power to delay a bill is relatively strong compared to chambers in other countries, such as in France, where there is no limit to how quickly the lower house can override the Senate’s concerns.³⁸

A more comprehensive analysis of these issues can be found in Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived* (2013, pp 40–66).

³⁷ It should be noted that second chambers’ powers often vary according to the different types of legislation being considered, be it ‘ordinary’ legislation, financial legislation or constitutional amendments. In many second chambers, the powers of a second chamber may be more restricted when considering financial legislation than they might be when considering ‘ordinary’ legislation. In contrast, many second chambers enjoy greater power in relation to constitutional amendments, particularly in countries with written constitutions; for more detail see Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*, 2013, pp 40–66.

³⁸ The powers of delay different second chambers can employ are discussed in more detail in Meg Russell, ‘Elected Second Chambers and Their Powers: An International Survey’, *Political Quarterly*, January–March 2012, vol 83 no 1, pp 124–7.

Appendix I: List of Countries with Bicameral Legislatures

Country	Name of the Second Chamber
Afghanistan	House of Elders
Algeria	Council of the Nation
Antigua and Barbuda	Senate
Argentina	Senate
Australia	Senate
Austria	Federal Council
Bahamas	Senate
Bahrain	Shura Council
Barbados	Senate
Belarus	Council of the Republic
Belgium	Senate
Belize	Senate
Bhutan	National Council
Bolivia	Chamber of Senators
Bosnia and Herzegovina	House of Peoples
Brazil	Federal Senate
Burundi	Senate
Cambodia	Senate
Cameroon	Senate
Canada	Senate
Chile	Senate
Colombia	Senate
Congo	Senate
Czech Republic	Senate
Democratic Republic of the Congo	Senate
Dominican Republic	Senate
Equatorial Guinea	Senate
Ethiopia	House of the Federation
France	Senate
Gabon	Senate
Germany	Federal Council
Grenada	Senate
Haiti	Senate
India	Council of States
Ireland	Senate
Italy	Senate
Jamaica	Senate
Japan	House of Councillors
Jordan	Senate
Kazakhstan	Senate
Kenya	Senate
Lesotho	Senate

Liberia	The Liberian Senate
Madagascar	Senate
Malaysia	Senate
Mauritania	Senate
Mexico	Senate
Morocco	House of Councillors
Myanmar	House of Nationalities
Namibia	National Council
Netherlands	Senate
Nigeria	Senate
Oman	State Council
Pakistan	Senate
Palau	Senate
Paraguay	Senate
Philippines	Senate
Poland	Senate
Romania	Senate
Russian Federation	Council of the Federation
Rwanda	Senate
Saint Lucia	Senate
Slovenia	National Council
South Africa	National Council of Provinces
South Sudan	Council of States
Spain	Senate
Sudan	Council of States
Swaziland	Senate
Switzerland	Council of States
Tajikistan	National Assembly
Thailand	Senate
Trinidad and Tobago	Senate
United Kingdom	House of Lords
United States of America	Senate
Uruguay	Senate
Uzbekistan	Senate
Yemen	Consultative Council
Zimbabwe	Senate

Source: IPU database, accessed 29 January 2014.

Appendix 2: Comparison of Size of Upper and Lower Chambers

Country	Number of Lower House Members	Number of Upper House Members	Size of Upper Chamber as percentage of Lower Chamber
Saint Lucia	18	11	61.1
Grenada	15	13	86.7
Palau	16	13	81.3
Belize	32	13	40.6
Bosnia and Herzegovina	42	15	35.7
Bahamas	38	16	42.1
Antigua and Barbuda	19	17	89.5
Barbados	30	21	70.0
Jamaica	63	21	33.3
Philippines	291	24	8.2
Bhutan	47	25	53.2
Namibia	78	26	33.3
Rwanda	80	26	32.5
Swaziland	65	30	46.2
Liberia	73	30	41.1
Haiti	99	30	30.3
Trinidad and Tobago	42	31	73.8
Uruguay	99	31	31.3
Dominican Republic	183	32	17.5
Sudan	354	32	9.0
Lesotho	120	33	27.5
Madagascar	127	33	26.0
Tajikistan	63	34	54.0
Bolivia	130	36	27.7
Chile	120	38	31.7
Bahrain	40	40	100.0
Slovenia	90	40	44.4
Burundi	106	41	38.7
Paraguay	80	45	56.3
Switzerland	200	46	23.0
Kazakhstan	107	47	43.9
South Sudan	332	50	15.1
Mauritania	147	56	38.1
Ireland	166	60	36.1
Cambodia	123	61	49.6
Austria	183	62	33.9
Belarus	110	64	58.2
Kenya	350	68	19.4
Germany	598	69	11.5
Malaysia	222	70	31.5

Belgium	150	71	47.3
Congo	139	72	51.8
Argentina	257	72	28.0
Jordan	150	75	50.0
Netherlands	150	75	50.0
Equatorial Guinea	100	76	76.0
Australia	150	76	50.7
Zimbabwe	270	80	29.6
Czech Republic	200	81	40.5
Brazil	513	81	15.8
Oman	84	83	98.8
South Africa	400	90	22.5
Uzbekistan	150	100	66.7
Cameroon	180	100	55.6
United States of America	435	100	23.0
Poland	460	100	21.7
Gabon	120	102	85.0
Colombia	166	102	61.4
Afghanistan	249	102	41.0
Pakistan	342	104	30.4
Canada	308	105	34.1
Democratic Republic of the Congo	500	108	21.6
Nigeria	360	109	30.3
Yemen	301	111	36.9
Mexico	500	128	25.6
Ethiopia	547	135	24.7
Algeria	462	144	31.2
Thailand	500	150	30.0
Russian Federation	450	166	36.9
Romania	412	176	42.7
Myanmar	440	224	50.9
Japan	480	242	50.4
India	545	245	45.0
Spain	350	266	76.0
Morocco	395	270	68.4
Italy	630	323	51.3
France	577	348	60.3
United Kingdom	650	760	116.9

Notes: The Parline database includes figures for both the statutory number of members and the current membership. The figures above are the number of statutory members as recorded by Parline.

Source: IPU database, accessed 29 January 2014.

Appendix 3: Membership Terms of Upper and Lower Chambers

Country	Terms of Lower House (Years)	Terms of Upper House (Years)	Term Length In Proportion	Notes
Algeria	5	6	Longer	
Argentina	4	6	Longer	
Australia	3	6	Longer	
Brazil	4	8	Longer	
Chile	4	8	Longer	
Congo	5	6	Longer	
Czech Republic	4	6	Longer	
France	5	6	Longer	
Gabon	5	6	Longer	
Haiti	4	6	Longer	
India	5	6	Longer	
Japan	4	6	Longer	
Kazakhstan	5	6	Longer	
Liberia	6	9	Longer	
Mauritania	5	6	Longer	
Mexico	3	6	Longer	
Morocco	5	9	Longer	
Pakistan	5	6	Longer	
Philippines	3	6	Longer	
Rwanda	5	8	Longer	
Slovenia	4	5	Longer	
Thailand	4	6	Longer	
United States of America	2	6	Longer	
Antigua and Barbuda	5	5	Same	
Bahamas	5	5	Same	
Bahrain	4	4	Same	
Barbados	5	5	Same	
Belarus	4	4	Same	
Belgium	4	4	Same	
Belize	5	5	Same	
Bhutan	5	5	Same	

Bolivia	5	5	Same	
Bosnia and Herzegovina	4	4	Same	
Burundi	5	5	Same	
Cambodia	5	5	Same	
Cameroon	5	5	Same	
Colombia	4	4	Same	
Democratic Republic of the Congo	5	5	Same	
Dominican Republic	4	4	Same	
Equatorial Guinea	5	5	Same	
Ethiopia	5	5	Same	
Grenada	5	5	Same	
Ireland	5	5	Same	
Italy	5	5	Same	
Jamaica	5	5	Same	
Jordan	4	4	Same	
Kenya	5	5	Same	
Lesotho	5	5	Same	
Myanmar	5	5	Same	
Namibia	5	5	Same	
Netherlands	4	4	Same	
Nigeria	4	4	Same	
Oman	4	4	Same	
Palau	4	4	Same	
Paraguay	5	5	Same	
Poland	4	4	Same	
Romania	4	4	Same	
Saint Lucia	5	5	Same	
South Africa	5	5	Same	
South Sudan	4	4	Same	
Spain	4	4	Same	
Sudan	5	5	Same	
Swaziland	5	5	Same	
Switzerland	4	4	Same	
Tajikistan	5	5	Same	

Trinidad and Tobago	5	5	Same	
Uruguay	5	5	Same	
Uzbekistan	5	5	Same	
Zimbabwe	5	5	Same	
Madagascar	5	5	Same	
Afghanistan	5	Other	N/A	Terms vary from 3–5 years; 3 years for members from local District Councils, 4 years for members from Provincial Councils, 5 years for presidential appointees.
Austria	5	Other	N/A	The term of office of Councillors varies from 5 to 6 years according to the province they represent; they are partially renewed after the provincial elections.
Canada	4	Other	N/A	Members continue to serve until they are 75 years old.
Germany	4	Other	N/A	The members' terms depend on that of the government of the Land (State) they represent (Germany is made up of 16 Länder).
Malaysia	5	Other	N/A	The tenure of office is a three-year term for a maximum of two terms.
Russian Federation	5	Other	N/A	Individual members' term varies according to the republic/region they represent
United Kingdom	5	Other	N/A	Life membership, with the exception of the Lords Spiritual
Yemen	6	Other	N/A	Continuous

Source: IPU database, accessed 29 January 2014.

Appendix 4: Membership Systems of Second Chamber

Country	Chamber	Electoral System
Afghanistan	House of Elders	Majority
Algeria	Council of the Nation	Majority
Argentina	Senate	Majority
Belarus	Council of the Republic	Majority
Bhutan	National Council	Majority
Bolivia	Chamber of Senators	Majority
Brazil	Federal Senate	Majority
Burundi	Senate	Majority
Chile	Senate	Majority
Congo	Senate	Majority
Czech Republic	Senate	Majority
Dominican Republic	Senate	Majority
Gabon	Senate	Majority
Haiti	Senate	Majority
Kazakhstan	Senate	Majority
Kenya	Senate	Majority
Liberia	The Liberian Senate	Majority
Mauritania	Senate	Majority
Myanmar	House of Nationalities	Majority
Nigeria	Senate	Majority
Palau	Senate	Majority
Philippines	Senate	Majority
Poland	Senate	Majority
Swaziland	Senate	Majority
Switzerland	Council of States	Majority
Thailand	Senate	Majority
United States of America	Senate	Majority
Uzbekistan	Senate	Majority
Cameroon	Senate	Mixed
France	Senate	Mixed
Japan	House of Councillors	Mixed
Mexico	Senate	Mixed
Romania	Senate	Mixed
Spain	Senate	Mixed
Antigua and Barbuda	Senate	Other
Austria	Federal Council	Other
Bahamas	Senate	Other
Bahrain	Shura Council	Other
Barbados	Senate	Other
Belize	Senate	Other
Bosnia and Herzegovina	House of Peoples	Other
Cambodia	Senate	Other

Canada	Senate	Other
Equatorial Guinea	Senate	Other
Ethiopia	House of the Federation	Other
Germany	Federal Council	Other
Grenada	Senate	Other
Ireland	Senate	Other
Jamaica	Senate	Other
Jordan	Senate	Other
Lesotho	Senate	Other
Madagascar	Senate	Other
Malaysia	Senate	Other
Morocco	House of Councillors	Other
Namibia	National Council	Other
Oman	State Council	Other
Russian Federation	Council of the Federation	Other
Rwanda	Senate	Other
Saint Lucia	Senate	Other
Slovenia	National Council	Other
South Africa	National Council of Provinces	Other
South Sudan	Council of States	Other
Sudan	Council of States	Other
Tajikistan	National Assembly	Other
Trinidad and Tobago	Senate	Other
United Kingdom	House of Lords	Other
Yemen	Consultative Council	Other
Australia	Senate	Proportional
Belgium	Senate	Proportional
Colombia	Senate	Proportional
Democratic Republic of the Congo	Senate	Proportional
India	Council of States	Proportional
Italy	Senate	Proportional
Netherlands	Senate	Proportional
Pakistan	Senate	Proportional
Paraguay	Senate	Proportional
Uruguay	Senate	Proportional
Zimbabwe	Senate	Proportional

Source: IPU database, accessed 29 January 2014.