

Comparative presidencies: The inadequacy of the presidential, semi-presidential and parliamentary distinction

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Abstract. The role of the president is presumed to vary amongst presidential, semi-presidential and parliamentary systems. However, there are a variety of subtypes within semi-presidential systems. Debate often hinges on the prime minister and government, and to whom they are more accountable. However, the accountability of prime ministers and governments to presidents can be rather ‘fuzzy’. This article looks through the prism of the president rather than that of the government. After examining definitions of presidential, parliamentary and semi-presidential systems, several dispositional categories of political regimes will be established. Then presidential power will be assessed through a series of dichotomous measures, and for all electoral democracies with a president. Finally, the character of each category will be assessed. The concept of ‘semi-presidentialism’ is rejected in favour of more meaningful labels: presidential systems, parliamentary systems with presidential dominance, parliamentary systems with a presidential corrective and parliamentary systems with figurehead presidents.

Introduction

There is an ongoing ‘institutional’ debate – rather than an academic consensus – regarding the comparative effects on democratisation of presidential and parliamentary systems. On the one hand, Juan Linz (1994: 70) has concluded that ‘presidentialism seems to involve greater risk for stable democratic politics’ due to various flaws in (most) presidential systems. On the other hand, Shugart & Carey (1992: 44–46, 40) stress that presidential systems have the advantages of accountability and transparency lacking in (coalitional) parliamentary systems, and they (and others) do not find that presidential regimes as a whole break down more frequently than parliamentary ones.

However, this debate is complicated by the fact that many political regimes are semi-presidential in the sense of combining a presidency with the parliamentary feature of a prime minister and government accountable to the legislature. Interest in this regime category has increased sharply in the past decade (for some recent analyses of whether this is a clear regime type, see Bahro & Vesser 1995; Steffani 1995). Nevertheless, similar controversies can

also be found here. Linz (1994: 48–55), for example, is sceptical about semi-presidential systems, seeing in them the threat of either instability or imbalance. By contrast, Bunce (1997: 172–173) notes how a president in a semi-presidential system can ‘offset’ weak parliaments and governments, as now seem to be found in Eastern Europe.

This analysis seeks to assess the nature of presidencies, above all in global terms. The scope here is all electoral democracies with a president that have existed or currently exist unless the transition to (electoral) democracy has occurred so recently (within the last three years) that any such analysis would be tentative. As defined by Freedom House (2001) and others, an ‘electoral democracy’ is a polity with a choice of political parties, competitive elections and some separation of powers among the different branches of government. However, electoral democracies are not necessarily liberal democracies in the sense of having full and universal civil liberties and a strong rule of law. Nor do they have to grant universal suffrage. Electoral democracies may also lack full civilian control over the military. From such a list of electoral democracies, I have excluded any country with a monarch or Commonwealth governor-general as being outside the spirit of the debate. In terms of the structure of this analysis, I shall first review the literature on presidential, parliamentary, and semi-presidential systems. Then I shall outline some dispositional combinations, focus on dichotomous measures of selected presidential contexts and powers, and finally I shall suggest appropriate terms for clusters of nations.

Presidential versus parliamentary systems

In distinguishing between presidential and parliamentary systems, Lijphart (1992: 2–3, 1999: 17) emphasises three points. First, in a presidential system the head of government (the president) is elected for a fixed term and will serve this unless there is the ‘unusual and exceptional process of impeachment’, whereas in a parliamentary system the head of government (prime minister or equivalent) is dependent on the confidence of the legislature and thus can be removed (along with the whole government) by a motion of no-confidence. Second, in a presidential system the head of government (the president) is popularly elected, if not literally directly by the voters then by an electoral college popularly elected expressly for this purpose, whereas in a parliamentary system the head of government (prime minister or equivalent) is ‘selected’ by the legislature. Third, in a presidential system there is effectively a one-person non-collegial executive, whereas in a parliamentary system the executive (i.e., the cabinet) is collective or collegial. A similar stress on a one-person

executive is given by Brunner (1996: 91), for whom the distinguishing feature of presidentialism is ‘the concentration of all total executive power in the person of the state president, who is not politically responsible to the parliament’.

For his part, Sartori (1994a: 84, 1994b: 106), like Lijphart, makes three basic points in that ‘a political system is presidential if, and only if, the head of state (president) i) results from popular election, ii) during his or her pre-established tenure cannot be discharged by a parliamentary vote, and iii) heads or otherwise directs the governments that he or she appoints’. There are two distinctions between Lijphart and Sartori worth noting here. First of all, Lijphart refers to the president as the head of government whereas Sartori refers to him or her as the head of state. Second and related, Sartori conceives of the government as being broader than the individual president. As such, Sartori (1994a: 84) rejects as too narrow the notion ‘that the head of state *must* also be the head of government’ in favour of a looser notion that authority flows from the president down – perhaps via a separate head of government.

Of course, as noted, for Lijphart the key role of the president is that of head of government (Lijphart 1999: 121). For Lijphart, the presence of a separate, ceremonial head of state is not a fundamental divergence from presidentialism. By contrast, Verney (1992 [1959]: 42) includes as a definitional feature of presidentialism the fact that the president ‘becomes at the same time head of state’ as well as head of government. Steffani (1995: 638, 1996: 55) distinguishes between a presidential system of government with a unified (*geschlossene*) executive and a parliamentary system of government with a dual executive (i.e., a separate head of state), while stressing various subtypes of each system. Somewhat analogous is the classification of Elgie (1998: 227–228) in which the presidential regime type is one with a head of state (popularly elected for a fixed term) but no (separate) head of government. Nevertheless, all of the authors and analyses mentioned would agree that in a democratic presidential system there is a single individual, normally but not invariably called ‘president’ (see Lijphart 1992: 5), popularly elected for a fixed term who plays the, or at least a, central role in the political system.

What, however, of parliamentary systems? On the one hand, scholars often attribute to parliamentary systems a long list of ‘propositions’ (Verney 1992 [1959]) or ‘common institutional criteria’ combined with ‘essential social-structural features’ (von Beyme 2000: 9–11). On the other hand, for at least some scholars (Sartori 1994a: 101, 1994b: 107–108; Brunner 1996: 76) there is in fact only one defining feature of a parliamentary system: accountability of the government to parliament. The government has to have the support or trust of the parliament in order to remain in office. Given this single defining feature, there is thus not only no definitional role of a ‘president’ in a parlia-

mentary system, but not even an agreed starting point for viewing the position. Elgie's (1998: 227–228) schema defines parliamentary systems as those with a head of state separate from the head of government, but this must be a head of state who is not popularly elected. Brunner (1996: 76–77) says nothing of the method of selection of the president, but notes that weak, moderately strong, and strong presidents are all possible in parliamentary systems. Steffani (1995: 638, 1996: 55) goes even further, it seems, arguing for a subtype of presidential dominance within the category of parliamentary systems. So does a strong or dominant president lead us back to a presidential system? Perhaps towards, but certainly not to – insofar as the defining parliamentary feature of government accountability to parliament does not exist in presidential systems. As Steffani (1996: 50) stresses, the parliamentary right of recall (no-confidence) is not just definitional, but also the primary criterion for differentiating parliamentary from presidential systems. Indeed, it is the combination of presidential power with parliamentary accountability that analysts have tried to explain via the notion of a semi-presidential system.

Semi-presidential systems: Duverger's schema and its alternatives

The concept of 'semi-presidentialism' was introduced by Maurice Duverger in the 1970s as a means of comparing the political system of the French Fifth Republic. For him, this 'new' regime type had three characteristics: the president is 'elected by universal suffrage', has 'quite considerable powers' and faces 'a prime minister and ministers who possess executive and governmental power and can stay in office only if the parliament does not show opposition to them' (Duverger 1980: 166). For Sartori (1994a: 132), however, there are five characteristics:

1. The head of state (president) is elected by popular vote – either directly or indirectly – for a fixed term of office.
2. The head of state shares executive power with a prime minister, thus entering a dual authority structure whose three defining criteria are:
3. The president is independent from parliament, but cannot govern alone or directly and therefore his will must be conveyed and processed via his government.
4. Conversely, the prime minister and his cabinet are president-independent in that they are parliament-dependent: they are subject to either parliamentary confidence or no-confidence (or both), and in either case need the support of a parliamentary majority.
5. The dual authority structure of semi-presidentialism allows for different balances and also for shifting prevalences of power within the execu-

tive, under the strict condition that the 'autonomy potential' of each component unit of the executive does subsist.

Sartori's fifth characteristic thus allows for greater flexibility than does Duverger's schema.

Duverger (1980) examined seven systems that appear to fit his definition: Fifth Republic France, Finland, Austria, Ireland, Iceland, Weimar Germany and Portugal. Of these, only France was considered to have 'an all-powerful presidency' (through the late 1970s) in contrast to Austria, Ireland and Iceland with 'figurehead' presidencies, and the Weimar Republic, Finland and Portugal with a dual executive (i.e., a 'balanced presidency and government') (Duverger 1980: 167–177 *passim*). Yet even if Duverger (1980: 167) concluded that in Austria, Ireland and Iceland '[p]olitical practice is parliamentary', he nevertheless still considered them to have semi-presidential government, at least based on their formal constitutions.

These cases do, however, raise some problems with Duverger's criteria. As far as the election of the president is concerned, the president in Finland was, before 1988, chosen by a directly elected electoral college which was highly partisan, especially in the case of multiple ballots (since the parties, not the voters, would decide on the second and subsequent choices of the electors). Elgie (1999: 8) notes that 'a similar criticism might be labelled against the Irish case' since parties there have historically united behind a single candidate, rendering an actual election unnecessary. Consequently, scholars such as Sartori (1994a: 132), Pasquino (1997: 130) and Elgie (1999: 9) insist that a better criterion is that such a president is elected by popular vote for a fixed term. Yet the rationale for this factor is at best implicit. The main point seems to be the legitimacy provided by direct election. Such legitimacy was certainly part of General de Gaulle's rationale for the 1962 change in France from a president elected by an electoral college of around 80,000 members (mainly local councillors) to a directly elected president. In the famous words of Duverger (cited in Morris 1994: 28), 'the constitutional amendment of 1962 gave the president no new powers – but it gave him power'. Yet if the issue is merely one of a 'relevant' president, then one can imagine a (relatively) powerful president who is not elected by universal suffrage, and indeed Duverger (1980: 165) noted this was the situation created by the Greek Constitution of 1975. Such cases certainly bring the possibility of conflict between the president and the government.

On Duverger's second characteristic, it is clear that the Austrian, Irish and Icelandic presidents do not possess (or at least never use) 'quite considerable powers'. One methodological option here is to limit the concept to presidents with such considerable powers (i.e., to systems with a relatively strong presi-

dent) (see, e.g., O'Neill 1997: 196). However, the concept of 'a relatively strong president' is one that can vary. Indeed, as Bahro et al. (1998: 203) note, Duverger has in different contexts used different terms for the 'necessary' amount of powers. Thus as Elgie (1999: 11) notes, 'the list of semi-presidential countries varies from one writer to another according to each writer's subjective judgement as to what constitutes a "relatively strong president"'. Elgie's solution (1999: 13) is to eliminate any measure of presidential power from the definition of 'semi-presidentialism'. Such a solution certainly provides for a larger number of cases. In turn, one can then make comparisons within this larger grouping. I am in agreement with Elgie on this point, and consequently in this analysis presidential powers are not an initial issue in terms of relevant cases, but will be central in terms of establishing subtypes.

Finally, Duverger's third criterion, that of a separate prime minister accountable to parliament, has in contrast been uncontroversial. Without it one has essentially a purely presidential system, such as in the Republic of Korea where the parliament can at best only *recommend* the removal of the government (see below). After all, what seems central to the spirit of semi-presidentialism is the potential, or at least the possibility, of the prime minister being caught between the president and the parliament. Such dual political responsibility of the government – to the parliament *and* to the president – is for Brunner (1996: 82) the defining characteristic of what he calls a 'parliamentary-presidential mixed system'.

Indeed, this issue of who controls the prime minister and cabinet has been considered central to the classification of regime types. In this same vein, Shugart (1993: 30–31) suggests the following five regime types (see also Shugart and Carey 1992): (1) 'pure' presidential, (2) premier-presidential, (3) president-parliamentary, (4) parliamentary with 'president' and (5) 'pure' parliamentary. He then notes that the distinction between his fourth and fifth categories is not crucial. In fact Merkl (1996) combines these in his analysis. Removing the 'pure' systems as well as the fourth type leaves us with the premier-presidential and the president-parliamentary categories, both of which are at least potentially 'semi-presidential'. However, it is argued, that presidents in the president-parliamentary systems (such as Russia and Weimar Germany) are stronger because of a clear ability to remove the government at will. In contrast, in the words of Shugart (1993: 30), '[t]he one power that a president in a premier-presidential system by definition does not possess is the power to dismiss a cabinet or members thereof if they enjoy the confidence of the parliament'. Furthermore, Shugart (1993) thus holds up France as the model of such a premier-presidential system.

Yet such notions of president-parliamentary systems has been criticised by Sartori (1994a: 133) as 'almost an empty class, a container in desperate want

of content'. Sartori (1994a: 139) finds fault or evanescence with their various cases, and also wonders 'why is France assigned to the premier-presidential type? For most of the time, and on the basis of the material constitution, the Fifth Republic ought to be assigned to the president-parliamentary type.' Certainly the French President has no *formal* power to dismiss governments. However, as von Beyme (2000: 14) notes, even if this is not a *de jure* power, it is a *de facto* one (as it was for President Walesa in Poland). Shugart and Carey (1992: 56–61, 123–124) tend to emphasise the experience of cohabitation, where the president could not fire a prime minister backed by an opposition majority. Yet this is not the same as saying the president cannot remove *any* prime minister with majority backing. It does appear to be the case that French presidents have been unable, or at least unwilling, to dismiss their *cohabitation* prime ministers – at least until after an election of some sort. To modify Shugart's phrasing, *cohabitation* is where the prime minister enjoys the confidence of a *hostile parliament* (i.e., hostile to the president). Where the president, prime minister and national assembly are of the same stripe, the prime minister may well enjoy the confidence of parliament, but nevertheless can be removed by the president. This happened, for example, to prime ministers Pompidou (in 1968), Chaban-Delmas (in 1972) and Rocard (in 1991), none of whom wanted to leave office. Indeed, Chaban-Delmas was dismissed by President Pompidou shortly after winning a massive vote of confidence in the National Assembly (Wright 1993: 115; see also Elgie & Machin 1991 and Elgie 1993.). Looking at the whole of the French Fifth Republic, it does seem that the president generally has dismissal powers, but not always. Thus it is, in practice, more president-parliamentary than premier-presidential. Yet even if there may be more examples of president-parliamentary behaviour in the real world, dismissal powers are but one aspect of presidential power.

Comparing political regimes

Viewing political regimes more broadly, then, let me initially lay out various regime types of competitive polities, based like Elgie (1998) on dispositional attributes, and leaving issues of presidential power until the next section. Like Sartori, I shall start with the position of head of state, and then ask three subsequent questions: Is the head of state also the sole head of government, or is there a separate head of government (also asked by Steffani)? Is the head of state popularly elected or not? Is the head of government (who may also be the head of state) accountable to the legislature and thus removable by a vote of non-confidence? These possible dispositional combinations are shown in Figure 1 (below).

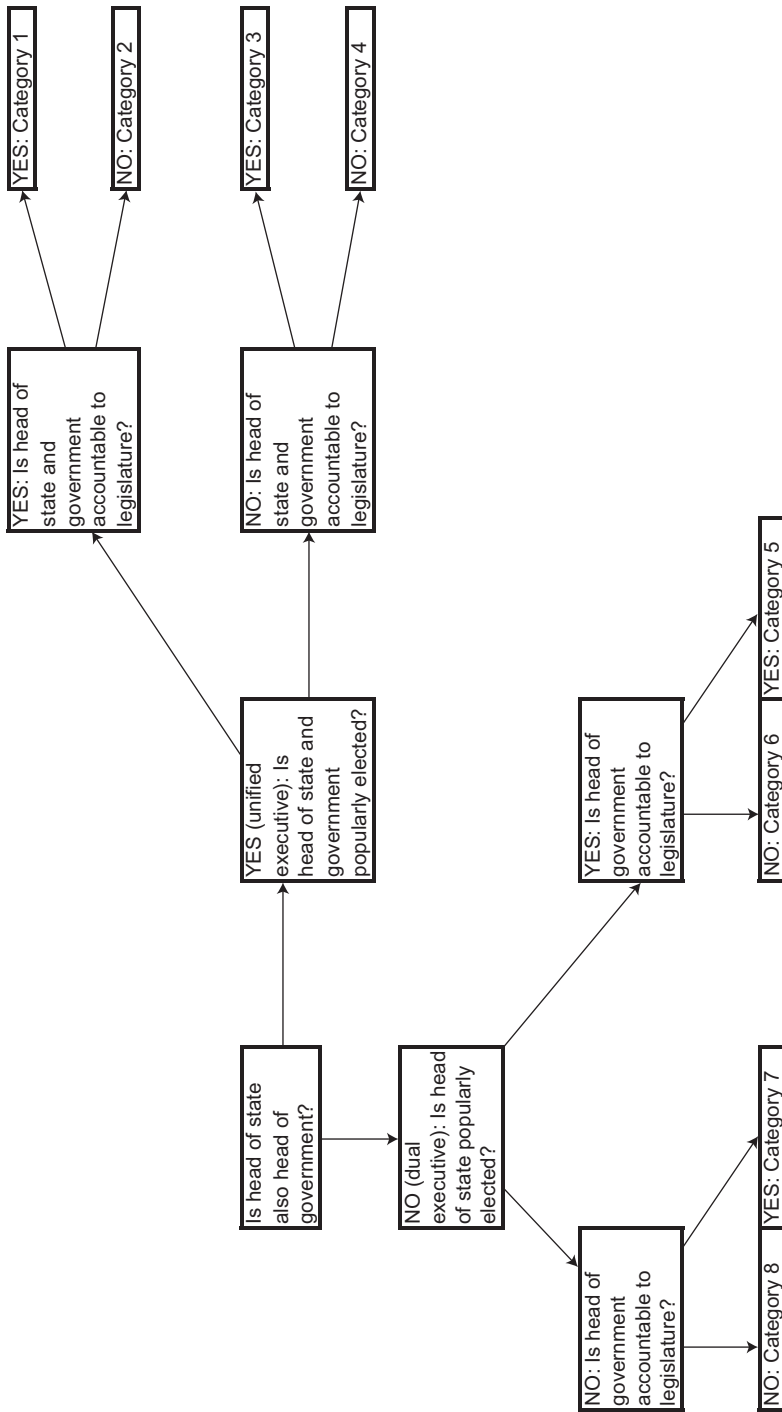


Figure 1. Regime categories.

The key initial distinction involves whether the head of state is also the head of government (a unified executive) as opposed to the head of state and government being separate (a dual executive). Within those systems with a unified executive, classic presidentialism is where the president is popularly elected but not accountable to the legislature (Category 2). Table 1 lists 35 examples of this category. However, one could have such an elected president accountable to the legislature (Category 1), but the only real world case is in Kiribati. Next, one could have a unified executive (i.e., a president who is both head of state and head of government, but with this president being selected by the legislature rather than being popularly elected). Category 3 describes a system where such a president is in turn accountable to the legislature. This category has three real world examples: Botswana, the Marshall Islands and Nauru. However, Category 4 reflects the situation where such a president is not accountable to the legislature after they select her or him and is found in Micronesia, South Africa since 1983 (across two regimes), Suriname after 1991 and Switzerland. It is also effectively found in Bolivia after 1982, where there is an election for the president, but where whenever no candidate wins a majority (as is the normal pattern) the legislature picks between the top two finishers (this had been among the top three before a constitutional reform in 1994) (Gamarra 1997: 363).¹

Turning now to dual executives (i.e., systems with a president as head of state and a prime minister (or equivalent) as head of government), there are also four theoretical categories. If the president is popularly elected, and if the prime minister and government are accountable to the legislature, then we have what appears to be at least potentially a semi-presidential system. Yet we are getting ahead of ourselves here. Figure 1 simply lists such a combination as Category 5. Table 1 lists 41 examples of this pattern. However, in Category 6 the president is popularly elected but the prime minister is not accountable to the legislature. It contains three real world examples: Guyana, South Korea and Sri Lanka.² Since no part of the executive is in fact accountable to the legislature, this means that this category functions essentially like the second one. What, then, is the role of a prime minister here? Certainly this is not a prime minister in the sense of a parliamentary apex, but rather as an aid to the president. The Constitution of Guyana (Section 101: 2) spells this out clearly: 'The Prime Minister shall be the principal assistant of the President in the discharge of his executive functions and leader of Government business in the National Assembly.' Finally, one can have a dual executive with the head of state being selected by the legislature rather than by popular election (or by heredity, as in constitutional monarchies). If in this situation the head of government is accountable to the legislature, then we seem to have a president as head of state but definitely a parliamentary system. This

Table 1. Contexts and powers of the president

	PE	CE*	AP	CM	VT	EDP	FP	GF	DL	Total
Argentina 1983-1994	1	1	1	1	1	0	1	1	0	7
Argentina 1994-present	1	1	1	1	1	1	1	1	0	8
Benin 1991-present	1	0	1	1	1	0	1	1	0	6
Brazil 1945-1953	1	1*	1	1	1	0	1	1	0	7
Brazil 1954-1964	1	0	1	1	1	0	1	1	0	6
Brazil 1985-present	1	1*	1	1	1	1	1	1	0	8
Chile 1925-1973	1	0	1	1	1	0	1	1	0	6
Chile 1989-present	1	1	1	1	1	1	1	1	0	8
Colombia 1960-1991	1	0	1	1	1	1	1	1	0	7
Colombia 1991-present	1	0	1	1	1	0	1	1	0	6
Costa Rica 1948-present	1	1*	1	1	1	0	1	1	0	7
Cyprus 1960-present	1	0	1	1	1	0	1	1	0	6
Dominican Republic 1994-present	1	1	1	1	1	0	1	1	0	7
Ecuador 1979-present	1	1*	1	1	1	1	1	1	0	8
El Salvador 1985-present	1	0	1	1	1	0	1	1	0	6
Ghana 1996-present	1	1*	1	1	1	0	1	1	0	7
Guatemala 1985-present	1	1*	1	1	1	0	1	1	0	7
Honduras 1980-present	1	1*	1	1	1	0	1	1	0	7
Malawi 1994-present	1	1*	1	1	1	0	1	1	0	7
Mexico 1994-present	1	1	1	1	1	0	1	1	0	7
Namibia 1990-present	1	1*	1	1	1	0	1	1	0	7

Nicaragua 1990–present	1	1*	1	1	1	1	0	1	1	0	1	0	7
Nigeria 1980–1983	1	0	1	1	1	1	0	1	1	0	1	0	6
Palau 1994–present	1	1*	1	1	1	1	0	1	1	0	1	0	7
Panama 1990–present	1	1*	1	1	1	1	0	1	1	0	1	0	7
Paraguay 1992–present	1	1*	1	1	1	1	0	1	1	0	1	0	7
Philippines 1946–1972	1	1*	1	1	1	1	0	1	1	0	1	0	7
Philippines 1985–present	1	1	1	1	1	1	0	1	1	0	1	0	7
Seychelles 1993–present	1	1*	1	1	1	1	0	1	1	0	1	0	7
United States ~1824–present	1	1	1	1	1	1	0	1	1	0	1	0	7
Uruguay 1942–1966	1	1*	1	1	1	1	0	1	1	0	1	0	7
Uruguay 1966–1973	1	1*	1	1	1	1	1	1	1	0	1	0	8
Uruguay 1985–present	1	1*	1	1	1	1	0	1	1	0	1	0	7
Venezuela 1960–2000	1	1*	1	1	1	1	0	1	1	0	1	0	7
Venezuela 2000–present	1	0	1	1	1	1	0	1	1	0	1	0	6
Total 1	35	26 (19)	35	35	35	35	6	35	35	0	35	0	
Total 0	0	9 (16)	0	0	0	0	29	0	0	0	0	35	

Category 6: Countries with a popularly elected head of state and a separate head of government (prime minister), with the latter not accountable to the legislature (Guyana popularly, but not separately, elected)

	PE	CE	AP	CM	VT	EDP	FP	GF	DL	Total
Guyana 1992–present	1	1	1	1	1	0	1	1	1	8
South Korea 1987–present	1	0	1	1	1	0	1	1	0	6
Sri Lanka 1978–present	1	0	1	1	1	1	1	1	0	7
Total 1	3	1	3	3	3	1	3	3	1	
Total 0	0	2	0	0	0	2	0	0	2	

Table 1. (Continued)

Category 4: Countries with a single head of state and government selected in some capacity by the legislature, but thereafter not accountable to it										
	PE	CE	AP	CM	VT	EDP	FP	GF	DL	Total
Bolivia 1982-present	0	0	1	1	1	0	1	1	0	5
Micronesia 1979-present	0	0	1	1	1	0	1	1	0	5
South Africa 1983-1994	0	0	1	1	0	1	1	1	0	5
South Africa 1994-present	0	0	1	1	0	0	1	1	0	4
Suriname 1991-present	0	0	1	0	1	0	1	1	0	4
Switzerland 1848-present	0	0	0	1	0	0	0	0	0	1
Total 1	0	0	5	5	3	1	5	5	0	
Total 0	6	6	1	1	3	5	1	1	6	
Categories 1 and 3: Countries with a single head of state and government selected in varying ways, but accountable to the legislature										
	PE	CE	AP	CM	VT	EDP	FP	GF	DL	Total
Botswana 1966-present	0	0	1	1	1	0	1	1	0	5
Kiribati 1979-present	1	0	1	1	0	0	1	1	0	5
Marshall Islands 1986-present	0	0	1	1	0	0	1	1	0	4
Nauru 1968-present	0	0	1	1	0	0	1	1	1	5
Total 1	1	0	4	4	1	0	4	4	1	
Total 0	3	4	0	0	3	4	0	0	3	

Category 5: Countries with a popularly elected head of state and a separate head of government (prime minister), with the latter accountable to the legislature

	PE	CE*	AP	CM	VT	EDP	FP	GF	DL	Total
Armenia 1995–present	1	0	1	1	0	0	1	1	1	6
Austria 1945–present	1	0	0	0	0	0	0	0	0	1
Belarus 1994–1996	1	0	1	1	1	1	1	1	0	7
Bulgaria 1991–present	1	0	1	0	1	0	0	0	0	3
Cape Verde 1992–present	1	0	1	1	1	1	1	0	0	6
Central African Republic 1995–present	1	0	1	0	1	0	1	1	1	6
Comoros 1992–1999	1	0	1	1	1	0	1	0	1	6
Croatia 1990–2000	1	0	1	1	0	1	1	1	0	6
Croatia 2000–present	1	0	1	1	0	1	0	0	0	4
Finland 1919–1956	1	0	1	1	1	0	1	0	0	5
Finland 1956–1994	1	0	1	1	1	0	1	1	0	6
Finland 1994–2000	1	0	1	1	1	0	1	0	0	5
Finland 2000–present	1	0	0	0	1	0	0	0	0	2
France 1958–present	1	0	1	1	1	0	1	1	1	7
Germany 1919–1933	1	0	1	0	0	1	0	1	1	5
Georgia 1994–present	1	1	1	1	1	0	1	1	0	7
Guinea-Bissau 1994–present	1	1*	1	1	0	0	1	1	0	6
Iceland 1944–present	1	0	0	0	0	0	0	0	0	1
Ireland 1948–present	1	0	1	0	1	0	0	0	0	3
Lithuania 1992–present	1	0	1	0	1	0	1	0	0	4
Macedonia 1991–present	1	0	1	0	1	0	1	0	0	4
Madagascar 1992–present	1	0	1	1	1	0	1	1	1	7

Table 1. (Continued)

	PE	CE*	AP	CM	VT	EDP	FP	GF	DL	Total
Mali 1992–present	1	0	1	1	1	0	1	1	1	7
Moldova 1994–2000	1	0	1	1	1	0	1	0	0	5
Mongolia 1992–present	1	0	1	0	1	0	1	0	0	4
Mozambique 1994–present	1	1*	1	1	1	1	1	1	0	8
Peru 1979–1992	1	1*	1	1	1	0	1	1	0	7
Poland 1992–1997	1	0	1	1	1	0	1	1	0	6
Poland 1997–present	1	0	1	0	1	0	0	0	0	3
Portugal 1976–1982	1	0	1	0	1	0	1	1	1	6
Portugal 1982–present	1	0	0	0	1	0	0	0	1	3
Romania 1996–present	1	1*	1	1	1	0	0	0	0	5
Russia 1993–present	1	0	1	1	1	1	1	1	0	7
São Tomé and Príncipe 1990–present	1	0	1	1	1	1	1	1	1	8
Slovakia 1999–present	1	0	0	1	0	0	0	0	0	2
Slovenia 1991–present	1	0	0	0	0	0	0	0	0	1
Spain 1931–1936	1	0	1	0	1	0	0	0	1	4
Taiwan 1994–present	1	0	1	1	0	0	1	1	0	5
Ukraine 1992–1996	1	0	1	1	1	0	1	1	0	6
Ukraine 1996–present	1	0	1	1	1	1	1	1	0	7
Uruguay 1919–1933	1	0	1	0	1	0	1	0	0	4
Total 1	41	5 (4)	35	25	31	9	28	20	11	
Total 0	0	36 (37)	6	16	10	32	13	21	30	

Category 7: Countries with a head of state selected in some capacity by the legislature and a separate head of government (prime minister), with the latter accountable to the legislature

	PE	CE	AP	CM	VT	EDP	FP	GF	DL	Total
Albania 1998–present	0	0	1	0	1	0	0	0	0	2
Austria 1920–1929	0	0	0	0	0	0	0	0	0	0
Austria 1929–1934	0	0	0	0	0	0	0	0	1	1
Bangladesh 1986–present	0	0	1	0	1	0	0	0	0	2
Czechoslovakia 1920–1935	0	0	1	0	1	0	0	0	0	2
Czechoslovakia 1935–1938	0	0	1	0	1	0	1	0	0	3
Czechoslovakia 1990–1992	0	0	1	1	1	0	1	0	0	4
Czech Republic 1992–2000	0	0	1	0	1	0	0	0	0	2
Czech Republic 2000–present	0	0	0	0	1	0	0	0	0	1
Dominica 1978–present	0	0	1	0	0	0	0	0	0	1
Estonia 1992–present	0	0	0	0	1	1	0	0	0	2
France 1875–1918	0	0	1	0	0	0	1	0	0	2
France 1918–1940	0	0	1	0	0	0	0	0	0	1
France 1944–1958	0	0	1	0	1	0	0	0	0	2
Germany 1949–present	0	0	0	0	0	0	0	0	0	0
Greece 1975–1986	0	0	1	1	1	0	0	0	0	3
Greece 1986–present	0	0	0	0	0	0	0	0	0	0
Hungary 1990–present	0	0	0	0	1	0	0	0	0	1
India 1950–present	0	0	1	0	1	0	0	0	0	2
Israel 1948–present	0	0	1	0	0	0	0	0	0	1
Italy 1948–present	0	0	1	0	1	0	0	0	0	2
Latvia 1922–1934	0	0	0	0	0	0	0	0	0	0
Latvia 1990–present	0	0	0	0	1	0	0	0	0	1

Table 1. (Continued)

	PE	CE	AP	CM	VT	EDP	FP	GF	DL	Total
Lithuania 1920–1934	0	0	0	0	0	0	0	0	0	0
Malta 1964–present	0	0	0	0	0	0	0	0	0	0
Mauritius 1992–present	0	0	1	0	1	0	0	0	0	2
Moldova 2000–present	0	0	1	0	1	0	0	0	0	2
Nigeria 1963–1966	0	0	1	0	0	0	0	0	0	1
Pakistan 1985–1997	0	0	1	0	1	1	0	1	1	5
Pakistan 1997–1999	0	0	1	0	1	0	0	0	0	2
Poland 1921–1926	0	0	0	0	0	0	0	0	0	0
Portugal 1911–1919	0	0	1	0	1	0	0	0	0	2
Portugal 1919–1926	0	0	1	0	1	0	0	0	1	3
Slovakia 1992–1999	0	0	0	1	0	0	0	0	0	1
South Africa 1961–1983	0	0	0	0	0	0	0	0	0	0
Suriname 1975–1979	0	0	0	0	0	0	0	0	0	0
Trinidad and Tobago 1976–present	0	0	1	0	0	0	0	0	0	1
Turkey 1961–1971	0	0	0	1	1	0	0	0	0	2
Turkey 1973–1980	0	0	0	1	1	0	0	0	0	2
Turkey 1983–present	0	0	1	1	1	0	0	0	0	3
Vanuatu 1980–present	0	0	0	0	0	0	0	0	0	0
Total 1	0	0	23	6	23	2	3	1	3	
Total 0	41	41	18	35	18	39	38	40	38	

Notes: PE = popularly elected; CE = concurrent election of president and legislature; AP = discretionary appointment powers; CM = chairing of cabinet meetings; VT = right of veto; EDP = long-term emergency and/or decree powers; FP = central role in foreign policy; GF = central role in government formation; DL = ability to dissolve the legislature.

combination is shown as Category 7 in Figure 1. Table 1 lists 41 examples of this category. Strictly speaking, by the terms set out in Figure 1, all electoral democracies with constitutional monarchies would also fall into Category 7. However, as noted above, these are outside the spirit of this analysis. Category 8 systems are those with a president who is not popularly elected choosing a prime minister who is unaccountable to parliament. Such a situation hardly seems democratic, and indeed there have been no real world electoral democracies with this combination.

Chronologically, the first systems with separate heads of state and heads of government, with the former popularly elected (that is, Category 5), were all introduced right after the First World War in Weimar Germany and Finland, but also in Uruguay (technically there was no head of government in Uruguay, just a collegial cabinet separate from the president). However, the first system with a separate head of state chosen by parliament in a competitive polity (i.e., Category 7) was actually introduced back in 1875 with the French Third Republic. Indeed, this analysis concurs with that of Blais et al. (1997: 443), who note that '[e]xperience suggests that once installed, direct presidential elections are not easily abandoned' – although this did occur in Moldova in 2000.

Measuring presidential power

It is the norm in the literature to provide some sort of list of presidential powers. Moreover, there seems to be a tendency to maximise the number of categories. Duverger (1978: 22) listed 'only' 14 presidential powers; whereas more recently, Lucky (1993–1994: 94) measures 28 different powers, and Hellman (1996) and Frye (1997) use 27. I shall be more parsimonious and limit this analysis to nine key powers, each of which will be measured dichotomously. This is in contrast to any sort of scaling measurement, such as that of Shugart and Carey (1992: Chapter 8) or Metcalf (2000). Scores are based on the constitutions given in Blaustein and Flanz (ongoing) as well as national sources, but are also based on actual political practice. By contrast, Shugart and Carey (1992: 155–156), for example, limit themselves to the legal constitution, which can lead to a mismeasurement of presidential power, as noted already for the case of the French Fifth Republic.

First of all, following Duverger's comments about France, the starting point is the question of whether the president is popularly elected or not (PE = 1 or 0), which is certainly central to her or his legitimacy and thus effective power. Second and related, Shugart and Carey (1992: 260) point to 'quasi-presidentialist' electoral formats (i.e., those with concurrent (or honeymoon) elections and synchronised terms for the president and the assembly). This

would maximise presidential influence over the composition of the national assembly through making the presidential election the central one that pulls the others. The opposite here are 'quasi-parliamentary' electoral formats involving non-synchronised terms and/or mid-term elections. Under these conditions, the legislature is elected independently of the president at best, and at worst may be chosen to deliver a second-order rebuke to her or him. Of course, a synchronised term cannot occur without first having concurrent elections, so this factor will merely be indicated with an asterisk (*) for reference, and the key distinction here will be concurrent elections or not (CE = 1 or 0).

The discretionary appointment by the president of some key individuals such as the prime minister, other cabinet ministers, high court judges, senior military figures and/or central bankers (AP = 1 or 0) is our third variable. The fourth is the ability of the president to chair formal cabinet meetings and thus engage in agenda setting (CM = 1 or 0). A fifth variable is the power of the president to veto legislation, or more accurately the right to return legislation for further consideration (VT = 1 or 0). Invariably the legislature can still pass its original legislation as long as there is enough votes to override such a veto. The threshold for such an override varies from the original relative majority to two-thirds of the chamber. Granted the level of this threshold is a comparative aspect of presidential power; however, it is somewhat beyond my dichotomous analysis here.

The sixth indicator relates to whether a president has broad emergency or decree powers for national disorder and/or economic matters which are effectively valid for an unlimited time (EDP = 1 or 0). One should note here that in certain cases, such as Russia, decrees take effect immediately and with permanence without requiring confirmation by parliament (see Carey & Shugart 1998: 10). In most countries, though, after 30 or 60 days decrees must be submitted to parliament for conversion into law. Yet, in some cases, presidents can issue what amounts to the same decree again; this 'effectively' produces long-term decree power. The seventh variable is whether a president has a central role (or indeed *the* central role) in foreign policy, including presiding over a security or defence council and/or having a say in the choice of foreign and defence ministers, attending and speaking for the country at international political meetings and summits, and generally 'making' foreign policy in at least certain key areas (FP = 1 or 0).

Where a president has a central role in forming the government, he or she scores highly on the eighth variable. Here government formation refers to the ability to select, remove and/or keep from office a given individual as prime minister, and/or a given party as part of the cabinet (GF = 1 or 0). This does not imply the ability, or really the need, to pick/veto every single cabinet min-

ister. The final variable reflects the ability of the president to dissolve the legislature at will, at most subject to only temporal restrictions (DL = 1 or 0). In other words, there is no need for an event such as the rejection of the budget (Poland) or the proposed prime minister (Russia) to activate this dissolution power. We can note that political systems with a strict separation of powers and fixed terms would not allow a president this dissolution power.

Table 1 thus scores each electorally democratic country with a presidency on these nine factors, with countries grouped by the categories of Figure 1. Since Category 1 has only one case, it is combined with Category 3 in Table 1. In terms of total powers broadly defined, one can simply sum these various ones and zeros. Table 1 thus gives totals both horizontally for each country and vertically for each category. Table 2 then gives statistical data on the totals for the various categories, ranked by the category means.

Presidential powers and overall nature by category

Category 2 (i.e., standard presidential systems) is quite a cohesive category as evidenced by the summary values in Table 2. Such ‘classic’ or ‘stereotypical’ presidents are popularly elected (a definitional feature of Category 2), but are not always elected concurrently, let alone for a synchronised term. Without exception, the president in Category 2 has discretionary appointment powers, the ability to chair cabinet meetings, veto powers over legislation, the central role in foreign policy and a (the) key role in forming the government. These commonalities are quite striking. Moreover, although some Latin American presidencies (i.e., Argentina, Brazil and Chile) are now stronger due to important decree powers (see Shugart & Mainwaring 1997: 44–47), this is hardly a common reality in Category 2. Overall, then, the power of the president in Category 2 systems is extremely consistent globally.

Table 2. Total powers of the president, category values

	N	Minimum	Maximum	Median	Mean	Std. dev. s
Category 6	3	6	8	7	7.00	1.00
Category 2	35	6	8	7	6.91	0.61
Category 5	41	1	8	5	5.00	1.92
Categories 1 and 3	4	4	5	5	4.75	0.50
Category 4	6	1	5	4.5	4.00	1.55
Category 7	41	0	5	2	1.49	1.19

I have noted that Category 6 essentially functions like Category 2, and indeed each of these Category 6 presidents have every power that presidents in all Category 2 systems have: popular election, appointment powers, chairing of cabinet meetings, legislative veto powers, foreign policy and government formation. Likewise, emergency and decree powers are rare in Category 6. One difference between these two categories is that in Category 2 most presidents are elected at the same time as the legislature and thus can provide legislative 'coattails', while in Category 6 this is only found in Guyana. Guyana is also exceptional in that its president can dissolve the legislature, unlike the other presidents in Category 6 and all the presidents in Category 2. Overall, though, Category 6 basically replicates the conditions of Category 2.

Presidential powers in Category 4, by contrast, are highly variable. This variation is overwhelmingly due to Switzerland's president being so much weaker than any of the others in this category. Indeed, the only power of the Swiss president is that of chairing cabinet meetings. Of course, this power is found in most of the other cases here: Bolivia, Micronesia and South Africa, but not Suriname (where the vice-president chairs the cabinet on a daily basis, although the president can take over this role). However, presidents in these countries also have the power to appoint as well as control over foreign policy and the ability to form governments. None of the presidencies in Category 4 have the power to dissolve parliament, so this absence does provide one common feature in addition to the absence of direct election.

The decision to group together the single N case of Category 1 with those in Category 3 seems justified by their overall scores in Table 1, leading to little variation at all for these combined categories in Table 2. Of course, the Category 1 case of Kiribati does by definition enjoy popular election, whereas in Botswana the president has veto power and in Nauru the president has dissolution power. Other than these differences, however, everything is the same: power over appointments, the chairing of cabinet meetings, control over foreign policy and government formation, and no emergency or decree powers. It can also be noted that three of these four combined cases are Pacific Island states.

Let me now turn to Category 5, which really is the most crucial part of the analysis, since it measures the supposed semi-presidential systems for presidential power and ultimately for what Duverger termed 'quite considerable powers'. The data in Table 2 are quite striking in this regard. This category has an enormous range, and also the highest standard deviation of any category. On average, and in terms of the median, a president in this category is certainly relevant, scoring five in total. However, the incoherence of this category behoves us to avoid using averages here. Looking at the vertical totals in Table

1, the only clear commonalities within this category are, by definition, popular election, the lack of concurrent elections (unlike most Category 2 presidencies) and appointment powers. By contrast, the presidencies within this category vary sharply in terms of chairing cabinet meetings, veto powers and emergency or decree powers, controlling foreign policy and government formation, and being able to dissolve the legislature. Indeed, these Category 5 presidencies are nearly perfectly divided in terms of control over government formation – in 20 they have it and in 21 they do not.

Such a lack of coherence leads to the perhaps controversial conclusion that even though one may wish to define systems as semi-presidential, there is really no such thing as a semi-presidential system when viewed through the prism of presidential powers. I would argue that such systems should be divided into three categories, based on their total score, with the breakpoints set at three and six.

At one extreme here are presidencies with a score of six or more, which incidentally is the minimum total value in both Category 2 and Category 6 (see Table 2). These presidencies thus have ‘quite considerable powers’, but of course still exist in a system where the government (though not the president) can be removed by a motion of no-confidence. Is this not what is meant by ‘semi-presidentialism’, at least in Duverger’s sense? Yes, but the term still does not adequately incorporate the parliamentary character of the government. Furthermore, I am sympathetic here to the argument of Steffani (1995: 639, 1996: 54) that the concepts of a semi-presidential system or a parliamentary-presidential mixed system prove to be ‘intellectual slips’ or ‘mistakes’ (*Fehlleistung*) since either the president dominates in a double executive or she or he does not. In the cases in this cluster, the president does dominate, at least most of the time. So what term should be used to describe this situation? Following Steffani (1995: 639, 1996: 54), one could call these either systems of presidential parliamentarianism or parliamentary systems with presidential dominance. Empirically, this groups together Armenia, Belarus (until Lukashenka’s *autogolpe*), Cape Verde, the Central African Republic, Comoros, Croatia until 2000, Finland from 1956 to 1994, France under the Fifth Republic, Georgia, Guinea-Bissau, Madagascar, Mali, Mozambique, Peru (until Fujimore’s *autogolpe*), Poland until 1997, Portugal until 1982, Russia, São Tomé and Príncipe, and the Ukraine.³

At the other extreme in this category are cases where the total score of presidential power is one or two. (Of course, by the definition in Category 5, it cannot be less than one). Here we speak of Austria, Finland since 2000, Iceland, Slovakia (since its 1999 switch to popular elections) and Slovenia. As Duverger (1980: 167) would say, in these cases ‘[p]olitical practice is parlia-

mentary', so I would call these cases of parliamentary systems with elected but essentially figurehead presidents. It should be noted that there are a very small number of cases within Category 5.

There is also an intermediate division of Category 5 where the total score of presidential powers is at least three but less than six. This grouping comprises Bulgaria, Croatia since 2000, Finland from 1919 to 1956 and again from 1994 to 2000, Weimar Germany, Ireland (contrary to Duverger's characterisation), Lithuania, Macedonia, Moldova until 2000, Mongolia, Poland since 1997, Portugal since 1982, Romania, Spain's democracy in the 1930s, Taiwan and Uruguay from 1919 to 1933. Here presidents are more than figureheads, but still lack 'quite considerable powers'. Political practice is thus not purely parliamentary, but is certainly more parliamentary than not. Thus the notion of 'partial semi-presidentialism' (Crawford 1996: 288–300), as has been used for East Central Europe, seems to be putting things the wrong way round. Rather, a better description of these systems is that of Colliard (1978: 280–281): parliamentary systems with a 'presidential corrective'. It is fitting that this term applies to the two (chronologically) first European cases of Category 5, Finland and Weimar Germany, since as Sartori (1994a: 128) notes: 'In 1919 there was no notion of semi-presidentialism. At the time, therefore, the Weimar system was perceived as a parliamentary system *counteracted* by a strong presidency' (emphasis added). It should be noted that Colliard (1978: 280–281) saw this as a corrective to a highly fragmented party system. By contrast, the argument here is that the president also plays a modest corrective role to parliamentarianism generally.

Finally, Category 7 is also somewhat incoherent, especially in terms of its range (from zero to five). However, both its median and mean scores are quite low, clearly below those of any other category. The vast majority of cases in Category 7 have total score of zero, one or two, making them cases of parliamentary regimes with unelected figurehead presidents. (Although this term is perhaps less appropriate for pre-World War One France, where the president was a central actor in foreign policy but little else). No case here has a score of 6 or more, the cutoff for considerable powers and a central presidential role. However, there have been several cases within Category 7 of scores of three, four or five: Czechoslovakia from 1935 to 1938 and again from 1990 to 1992, Greece from 1975 until 1986, Pakistan from 1985 to 1997, Portugal from 1919 to the coup of 1926 and Turkey since 1983. In some cases, these presidential powers were meant to fight centrifugalism (Portugal) or resulted from military tutelage (Pakistan and Turkey). Overall, all these cases, where still democratic, gave way to weaker presidencies (except, so far, for Turkey). This pattern suggests that such a 'presidential corrective' role cannot be maintained without the legitimacy of popular elections for the president.

Conclusion: Comparative presidencies

The categories of presidential, parliamentary and semi-presidential systems can certainly all be defined conceptually, but definitions are of varying utility in telling us about the powers of presidents. Certainly, a standard presidential system (or as I have called it, Category 2) does clearly imply a president who is the central political actor with a 'guaranteed' list of powers – popular election, appointment powers, chairing of cabinet meetings, legislative veto powers, central role in foreign policy and central role in government formation – mitigated by a guaranteed lack of dissolution power. The same points can basically be made for Category 6 systems, those that have a prime minister as well but one who is only accountable to the president. Most of these presidential powers, plus the absence of dissolution power, are also found in Categories 1 and 3, where the president is both the head of state and government, even if accountable to the legislature. With the exception of Switzerland, which appears quite *sui generis*, the same point could be made for Category 4 cases, even though none of these presidents have the legitimising power of popular elections.

By contrast, all Category 7 and 5 cases are parliamentary, at least to some extent, whether the president is elected or not, powerful or not. Likewise, the distinctions between complete figureheads and presidents who are essentially figureheads should not be over-emphasised. The real distinctions come when presidents have 'quite considerable powers' and are thus dominant (in Category 5) or even just 'corrective powers' (as in either Category 5 or 7). In summary, then, as an alternative to the shortcomings of the concept of 'semi-presidentialism', we may describe electoral democracies as one of: presidential systems, parliamentary systems with presidential dominance, parliamentary systems with a presidential corrective and parliamentary systems with figurehead presidents – plus, of course, parliamentary systems with figurehead monarchs.

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Notes

1. There is an historical parallel here with Chile, where in presidential elections before 1973 in situations of no absolute majority the Congress chose between the top two vote-getters.

- However, in every case, the plurality winner of the popular vote was confirmed by Congress. Shugart & Mainwaring (1997: 17, footnote 7) relate this to the paucity of close elections. Whether or not this was the central factor, the 'spirit' of pre-1973 Chile seems to place it in Category 2 (a classic presidential system) rather than with Bolivia in Category 4.
2. Somewhat trickier in this regard is the situation in Taiwan where, if two-thirds of the legislature demands a change in legislation, the prime minister must either agree to this change or resign. Presumably this procedure could be (ab)used to remove a prime minister, and thus approximates a motion of no-confidence. Consequently, Taiwan is included in Category 5 rather than 6.
 3. Placing Russia here may seem debatable, given that it attracts terms like 'superpresidentialism' (Fish 1997; McFaul 1999: 11) and 'hyperpresidentialism' (Bahro 1997: 16) that imply no real role for any other political actor. However, even if the Russian Duma is fragmented and comparatively weak, it can still exercise parliamentary control, such as when, despite President Yeltsin's wish, it refused to accept the return of Viktor Chernomyrdin as prime minister in 1998.

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