

Constitutional Crossroads: When Democracies Switch Forms of Government

By

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Table of Contents

Abstract

Introduction.....1

Chapter 1: Literature Review and Theoretical Concepts

| | |
|--|----|
| 1.1 The Literature on Democratic Forms of Government..... | 3 |
| 1.1.1 Shugart: 2x2 Origin and Survival Model..... | 3 |
| 1.1.2 Shugart: Two Subtypes of Semi-Presidentialism..... | 5 |
| 1.1.3 Lijphart: Eightfold Typology of Form of Government..... | 8 |
| 1.1.4 Lijphart: Behaviouralist Approach to Semi-Presidentialism..... | 9 |
| 1.1.5 Lijphart: Collegial VS One-Person Executive..... | 10 |
| 1.1.6 Lijphart: Categorisation of 1996-2003 Israel..... | 12 |
| 1.2 Assessing Forms of Government as Descriptive Typologies..... | 13 |
| 1.3 A Modified Sixfold Shugart's Typology of Form of Government..... | 14 |
| 1.4 The Six Democracies That Changed Form of Government..... | 17 |
| 1.5 Checking Robustness..... | 23 |
| 1.5.1 Threshold for Democracy..... | 23 |
| 1.5.2 Form of Government Typology Robustness..... | 24 |
| 1.6 Comparison with Bayram's Case Selection..... | 26 |
| 1.7 Patterns for Form of Government Change in the Six Countries..... | 28 |

Chapter 2: Alan Renwick's Reform Model

| | |
|--|----|
| 2.1 Two Types of Reform: Elite Majority Imposition & Elite-Mass Interaction..... | 30 |
| 2.2 Motivation for Reform: Power VS Values..... | 32 |
| 2.3 Reform Process: 6 Exogenous Factors..... | 34 |
| 2.4 Reform Process: 2 Endogenous Factors..... | 35 |
| 2.5 Other Scholars' Comments and Expansion on Renwick's Model..... | 36 |

Chapter 3: Applying Renwick to Form of Government Reform

| | |
|---|----|
| 3.1 A Form of Government Reform Model..... | 38 |
| 3.2 Applying the Model to the 6 Case Countries..... | 44 |

Conclusion.....48

References

Abstract

This thesis applies Alan Renwick's electoral reform model (2010) to form of government reform in democracies. By doing so, this thesis argues that the fundamental mechanics underlying form of government change are similar to electoral system change. In general, form of government reform is as rare as electoral reform in an uninterrupted democracy. However, such changes have occurred. This thesis focuses on the six democratic forms of government that exists by the end of 2024. Building on and modifying Salih Bayram's identification of nine such reforms globally 1945-2014 (2016), the thesis lists six democracies (France, Papua New Guinea, Israel, Moldova, Czech Republic and Senegal) that have experienced form of government change 1945-2024. When democracies attempt to change form of government, there are key actors (politicians and citizens) who push for or fight against this reform. This Renwick-based form of government reform model provides food for thought on the evolution of democratic institutions. In particular, civil society can take note of the drivers and impediments to such fundamental changes of a political system.

Introduction

Ever since Juan Linz kickstarted the debate on presidential VS parliamentary forms of democratic government by embracing the merits of parliamentarism (1990), the academic literature in the pros and cons of each form of government is rich. This is supplemented by discussions on the performance of the two major subtypes of semi-presidentialism (Elgie 2011; Sedelius and Linde 2018). Thus, political science literature is well-acquainted with the normative debate on the three major democratic forms of government: presidential, semi-presidential and parliamentary. What is curiously missing is a broad discussion on what causes a democracy to transition from one form of government to another.

The only systematic attempt of looking at this was conducted by Salih Bayram (2016), who identified eight democracies in the post-WWII period to have transitioned between forms of government. Bayram noted that there had not been any such attempts before him, although he cited relevant literature on institutional change. In particular, Camille Bedock's analysis of factors that impact institutional change (2015) was particularly relevant for Bayram. Examining the nine cases of form of government reform in eight democracies, Bayram made some general observations about the commonalities of these reforms.

The lack of other scholarship on form of government reform is particularly striking when one sees the abundance of research on another type of fundamental change in the "rules of the game": electoral system reform. Alan Renwick's 2010 book that analyses six cases of electoral reforms is probably still the pinnacle of electoral reform scholarship, but it can be seen as the accumulation of the efforts of many past scholars who worked on electoral systems.

Renwick's electoral reform model is well-suited to be adapted for form of government reform. Similar to Renwick, this thesis only focuses on mature democracies changing forms of

government. Just like fundamental electoral reform cases are rare but still exist, form of government changes are also rare but have happened. Form of government changes that occur during democratic consolidation or backsliding are excluded. However, I take inspiration from literature that analyses such transitions.

There first is a discussion of the six major democratic forms of government. We need to go beyond the presidential/semi-presidential/parliamentary paradigm and the 2x2 origin and survival paradigm (Shugart 2005). Only six democracies in modern time have transitioned from one of these six forms to another. Then, I breakdown Alan Renwick's electoral reform model and subsequent scholars' comments on it. The principles Renwick used in his model are used to create a form of government reform model. I apply them to the six cases of form of government reform.

Chapter 1: Literature Review and Theoretical Concepts

1.1 The Literature on Democratic Forms of Government

The three common forms of government in the democratic world are presidentialism, semi-presidentialism and parliamentarism. Any discussion on semi-presidentialism inevitably starts with a basic framework to analyse the pure forms of presidentialism and parliamentarism (Duverger 1980; Shugart 2005), so this would be my starting point too. I present Matthew Shugart's (2005, 326) 2x2 origin and survival model of forms of government and Arend Lijphart's (2012, 108) eightfold typology based on three dichotomous criteria. The major differences between the two models are discussed. In the end, a modified version of Shugart's model is used to explain the common form of governments and the rare hybrid forms that exist in the democratic world.

1.1.1 Shugart: 2x2 Origin and Survival Model

In Matthew Shugart's analysis of the two major subtypes of semi-presidentialism (2005), he first presented four logical forms of government based the origin and survival of the chief executive, as shown in Figure 1 below.

| | | Chief executive origin | |
|--------------------------|---------------------------------|-----------------------------------|---|
| | | from assembly majority (fused) | from electorate (separate from assembly) |
| Chief executive survival | fused with assembly majority | Parliamentary | Elected prime-ministerial |
| | separate from assembly majority | Assembly-independent | Presidential |

Pure types are shaded; their mirror hybrids are in the non-shaded cells.

Figure 1 Form of government based on origin and survival of the executive (Shugart 2005)

Shugart starts by simplifying our understanding of government into two aspects: how the chief executive (or main political leader of the country) is chosen and how the chief executive stays in office. In a typical parliamentary system (the top-left box), the chief executive is chosen by the assembly and can be fired by the assembly by a vote of no confidence at any time of its mandate, hence having its origin and survival in the legislature. In a typical presidential system (the bottom-right box), voters elect the chief executive separately from the assembly. In addition, the legislature does not have the right to terminate the chief executive's mandate for political reasons (impeachment does not count because it requires the chief executive to commit a crime or strong misdoing).

The alternative diagonal shows two logical but rare hybrids. The top-right box shows a system in which voters directly elect the chief executive; however, the legislature reserves the right to terminate the executive's mandate arbitrarily. The widely discussed case of this hybrid in modern times is the direct PM election system Israel experimented in the late 1990s (Ottolenghi 2001). The less widely discussed case of this hybrid is the current political system of Guyana (Ghany 2020). To put it simply, the big difference between the exec-leg relations of 1996-2003 Israel and modern-day Guyana is that the PM and Knesset were separately elected in Israel while in Guyana, voters cast one single ballot for both the executive president and the National Assembly. This is known as double simultaneous vote (DSV), which is also practiced in Uruguay (Margheritis 2015, 5). The difference is that the Uruguayan president is not subject to the legislature's confidence, while the Guyanese president is.

This "elected prime-ministerial" system (using Shugart's terminology) faces an inherent contradiction: the newly elected chief executive might face a hostile assembly, but for the assembly to immediately terminate the elected executive's mandate would be a slap in the face to the voters

who gave this chief executive democratic legitimacy. Thus, the implicit assumption of a “divided government” in this system is that a newly elected executive and a hostile assembly would work together to come up with a coalition government or compromise, while the legislature retains the “nuclear option” of terminating the executive’s mandate at any time. Presumably, a vote of no confidence becomes more reasonable after one or two years has passed since the last direct executive election.

Finally, the bottom-left box shows an assembly-independent non-directly elected executive. This is a system in which the legislature elects the chief executive but cannot terminate their mandate. Among democracies today, Suriname (Metin and Ünal 2023, 496) and Switzerland (Shugart 2005, 326) fit this description. What is less commonly noted is that the United States could be considered a hybrid of the bottom two boxes in Shugart’s table (Lijphart 2012, 109): there is no question that the American president is not subject to a confidence vote. However, we could see the constitutional mechanism for electing the president as a 2-round process, in which the first-round voters directly elect a candidate through the electoral college. If no candidate gets a majority of electoral college votes, the House of Representatives elects the president from the top-3 electoral college vote-getters (U.S. Constitution Amendment XII).

1.1.2 Shugart: Two Subtypes of Semi-Presidentialism

The 2x2 survival and origin model does not cover semi-presidential democracies. Maurice Duverger defined semi-presidentialism as a democracy having the following three attributes (1980):

1. The president is directly elected by the people.
2. The president has significant constitutional powers.

3. There is a prime minister who also holds significant powers, and the PM is subject to the assembly's confidence.

Later scholars took issue with the requirement that the president must hold significant powers for a system to be semi-presidential (Elgie 2004). Exactly what counts as a “significant” power? Thus, the minimalist model of semi-presidentialism was popularised: a democracy can be considered minimally semi-presidential as long as there is a president who is directly elected and a PM accountable to the assembly, making countries with incredibly weak presidents such as Ireland theoretically semi-presidential.

This model's appeal is obvious, as there should be no dispute over which democracies are minimally semi-presidential. However, some scholars have criticised the overreliance on only using two criteria. Carsten Anckar and Cecilia Fredriksson pointed out that the minimalist model differentiates semi-presidential republics from parliamentary ones only by the method of selection of the head of state (2019, 89). This can be problematic because it is totally possible that an indirectly elected president of a parliamentary republic can have more constitutional powers than the directly elected Irish president. The democratic legitimacy gained from popular elections do not always lead to power grabs from the president. This is why Anckar and Fredriksson defined semi-presidentialism by requiring the president to have at least one of the four following powers:

- (a) The power to chair cabinet meetings
- (b) Being in charge of foreign policy
- (c) A central role in government formation and/or dissolution
- (d) The ability to dissolve the legislature at will

For Anckar and Fredriksson, direct presidential elections are not necessary for a republic to be semi-presidential. In Shugart's original model (2005), popular elections are still a requirement, but he implicitly required the president to have at least one of the following constitutional (or written) powers:

- (c) Presidential initiative to name PM
- (d) Presidential discretion to dismiss PM
- (e) Assembly's ability to pass no-confidence motion against PM is constrained
- (f) Presidential discretion to dissolve assembly
- (g) Presidential veto

This is why in Shugart's original analysis (2005), Ireland and Finland were not considered semi-presidential, because constitutionally neither country's president had any of the above mentioned five powers. This thesis uses the original minimalist semi-presidentialism championed by Robert Elgie (2004), which means all democracies with popularly elected presidents and PMs accountable to the assembly count as minimally semi-presidential.

What is less contentious in the literature is the two subtypes of semi-presidentialism: premier-presidentialism and president-parliamentarism (Shugart and Carey 1992). In premier-presidentialism, the president has no power to terminate the PM's mandate. In president-parliamentarism, both the president and the assembly can unilaterally dismiss the PM. This means that in the latter, the cabinet is accountable to two "chambers" at the same time: the president and the assembly. As such, premier-presidentialism is closer to pure parliamentarism while president-parliamentarism is closer to pure presidentialism.

Thus, Matthew Shugart implicitly categorised all democracies into six categories (2005): four of them are shown in the 2x2 origin and survival model, and the other two are premier-presidentialism and president-parliamentarism. Shugart did not explicitly claimed that all democracies at the time of his writing fit into one of the six categories, but this categorisation does a good job conceptualising form of government in terms of executive-legislative relation. In this thesis's sixfold typology, presidential and assembly-independent systems are in one category, and the two subtypes of semi-presidentialism are together as well. I justify my choices by explaining the key difference between presidentialism and parliamentarism lies in the survival of the

executive, not the origin. In addition, two special categories are created to accommodate the hybrid government forms in Papua New Guinea and Bhutan.

1.1.3 Lijphart: Eightfold Typology of Form of Government

Figure 2 below shows how Arend Lijphart categorised 36 mature democracies by their form of government in the post-WWII period (2012). In the contrast between the pure forms of presidentialism and parliamentarism, Lijphart used three instead of two dichotomous dimensions:

- 2 Collegial VS one-person executive
- 3 Existence of confidence votes in the executive
- 4 Existence of direct executive elections

| | | Collegial executive | | One-person executive | |
|-----------------------------------|--|--|---|-------------------------------------|--|
| | | Dependent on legislative confidence | Not dependent on legislative confidence | Dependent on legislative confidence | Not dependent on legislative confidence |
| Executive selected by legislature | | Parliamentary | Hybrid I | Hybrid II | Hybrid III |
| | | AUL GRE MAU AUS* ICE* NET BAH IND NZ BAR IRE* NOR BEL ITA POR* BOT JAM SPA CAN JPN SWE DEN LUX TRI FIN* MAL UK GER FRA* (1986–88, 1993–95, 1997–2002) ISR (1949–96, 2003–) | SWI | | |
| Executive selected by voters | | Hybrid IV | Hybrid V | Hybrid VI | Presidential |
| | | | | | ARG CR KOR US URU FRA* (1958–86, 1988–93, 1995–97, 2002–) ISR (1996–2003) |

*Semipresidential systems

Figure 2 Form of government of 36 democracies 1945-2010 (Lijphart 2012)

To analyse Lijphart's model, I show the three biggest differences it has with Shugart's model: behaviouralist approach to semi-presidentialism, the additional dimension of collegial VS one-person executive and categorising 1996-2003 Israel as a variant of presidentialism.

1.1.4 Lijphart: Behaviouralist Approach to Semi-Presidentialism

Lijphart acknowledges six minimally semi-presidential countries among his 36 cases. Despite using the minimalist institutionalist model as a starting point, Lijphart clearly established himself as a behaviouralist in his semi-presidentialism categorisation. Lijphart considered five out of these six countries to be de facto parliamentary because their directly elected presidents wield little power in practice and act as symbolic figureheads for the most part. Lijphart would argue that those directly elected presidents are not fundamentally different from the indirectly elected presidents of Germany and Italy. For France, Arend Lijphart applied the cohabitation model, in which when the French president has majority support in parliament, France is de facto presidential; when the opposition has a clear majority, the PM becomes the de facto leader, which turns France behaviourally into a parliamentary system. This is also known as the alternating model. When there is no clear majority in parliament, the behaviouralist interpretation of the French political system becomes more problematic, as is the current case of France since the 2024 legislative election.

The behaviouralist approach to understanding semi-presidentialism is opposed by institutionalists scholars such as Matthew Shugart, who champion the written and de jure constitutional rules of democracies over the real-life power balance of politicians. Shugart argued behaviouralists start with the real-life outcome (who the de facto political leader of the country is) and work backwards to find out the system of government (2005, 327). Taking the behaviouralist approach to the extreme, one would be essentially saying that written constitutions are useless

because what matters is the real-life power structure. Institutionalists such as Shugart advocate scholars to start from the constitutional structure of a democracy and see how behavioural outcomes are produced as a result. As this thesis would explain in the modified Shugart's sixfold typology later, a mostly institutionalist approach is taken. Shugart's point that constitutions, not outcomes, should serve as the starting point is the base of this modified sixfold typology, which is why all minimally semi-presidential democracies are put into one category.

1.1.5 Lijphart: Collegial VS One-Person Executive

Fundamentally, Lijphart was building upon Shugart's model in that they share two dichotomous dimensions: how the executive is chosen (by voters or the assembly) and how whether the executive's is dependent on the assembly's confidence or not. However, Lijphart added one more dimension: whether the executive consists of one person or a collegial cabinet. Looking at the history of how parliamentarism and presidentialism evolved, we can tell that collegial governance was baked into the spirit of British parliamentarism (Jones 2016, 5) and executive personalism was taken as a given in the development of American presidentialism as the US president was supposed to replace an executive monarch. Thus, other than the special case of undisputed collective governance in Switzerland (Lijphart 2012), Lijphart categorised all parliamentary democracies as having collegial leadership and presidential ones as having unitary executives.

This is a significant simplification of how modern parliamentary cabinets work. It has been widely noted that the office of the British PM has gone through "presidentialisation," especially under the premierships of Margaret Thatcher and Tony Blair (Hayton and Heppell 2015). On the other hand, popularly elected presidents' executive power can vary widely depending on, among many things, the constitutional power balance between the president and the assembly and of

course, whether the president commands a legislative majority or not. Arend Lijphart noted that “the most important decisions in presidential systems can be made by the president with or without, and even against, the advice of the cabinet,” while parliamentarism requires the cabinet to approve (at least implicitly) the PM’s big decisions. I disagree with this black-and-white interpretation. One way to simplify a parliamentary system’s fundamental difference from a presidential system is that the assembly has the option to terminate the PM’s mandate at any point. To say that the cabinet must approve the PM’s decision in any parliamentary system ignores the fact that the only real constraint on the PM is a successful vote of no confidence. Ministers resigning from cabinet in a one-party majority government or junior coalition parties withdrawing from a minimum-winning cabinet are all credible threats only because they signal the potential for a vote of no confidence in the PM.

Of course, the British PM who leads a one-party government that commands a strong majority has more authority over the other cabinet ministers than the Dutch PM who presides over a multi-party coalition. Factors such as party discipline also matter, as backbenchers of the government’s party could revolt against their own party leader. Scholars agree that only Switzerland has achieved true collegial governance (Lijphart 2012, 108), but even the Swiss collegial model is due to behavioural factors such as the ease of referendums forcing the 4-party grand coalition to reach consensus. How “collective” cabinet decision-making depends on factors not directly related to form of government, making this dimension not helpful in a model to explain presidentialism and parliamentarism.

In addition, Lijphart viewed Hybrid II in his typology a logical impossibility (Lijphart 2012, 109). Hybrid II refers to a hypothetical variant of a parliamentary democracy in which the only difference with conventional parliamentarism is having a one-person instead of a collegial

executive. Lijphart implied that this hybrid is impossible because no matter how powerful the PM is, they would always be at the mercy of parliament, which means the executive is “collegial” in the sense that we can see it as parliament governing the country. Even if all the ministers in the cabinet take orders from the PM without question, parliament reserves the right to terminate the PM’s mandate, so the PM has to make concessions to the “silent majority” of the assembly.

There is validity in this view, although it is baffling why Lijphart was not more explicit in explaining it. The focus of this thesis is not on the degree of collegiality in democratic cabinets. However, the criterion of “collegial VS one-person executive” seems redundant when Lijphart assumes that votes of confidence against an indirectly elected executive forces collegiality. The question then becomes, what happens if votes of confidence are possible against a popularly elected executive? This is where Lijphart and Shugart’s models really differ. The next section analyses Lijphart’s categorisation of 1996-2003 Israel, a key difference between the two models.

1.1.6 Lijphart: Categorisation of 1996-2003 Israel

Arend Lijphart considered the seven-year experiment Israel had with direct PM elections as a variation of presidentialism. Lijphart justified it by saying it was similar to the 1987 Committee on the Constitutional System proposal for fixing divided government deadlock in the US (2012, 112), as the “elected prime-ministerial” system was basically a typical presidential system with the added option of giving the assembly and the president an option to call for snap general elections for both the executive post and the assembly. One might even say such a system already exist in some form in Ecuador, where a constitutional clause known as *muerte cruzada* (mutual death) allows the president to call for snap general elections for both the presidency and National Assembly when certain conditions are fulfilled (Ecuador 2008, art. 148).

Thus, Lijphart is essentially saying the executive did not truly depend on the Knesset's confidence in 1996-2003 Israel because a successful vote of no confidence automatically leads to general elections for both executive and legislative branches. If we agree with this logic, then it becomes questionable whether the British PM is truly dependent on the House of Common's confidence as well. British constitutional convention stipulates that if the government loses a confidence vote, the PM can either resign or call a snap election. To say that the PM has the "option" to resign after a no-confidence vote is misleading: a PM always has the option to resign! In the UK, if the PM resigns at any point, regardless of whether the resignation was forced by the no-confidence motion or not, the monarch would appoint a person to be interim PM on the advice of other senior ministers in the cabinet. Presumably, the new appointee would be a temporary one until a parliamentary majority formalises their preferred candidate for PM.

There is indeed a broader discussion to be had about the variations in confidence vote procedures across democracies (Lento and Hazan 2021). In most Westminster systems, a no-confidence motion leads to snap elections, unless the PM decides to resign and allow parliament to choose a replacement. In Spain, Italy and modern-day Israel, a successful vote no confidence must be put forward alongside the alternative PM candidate in a procedure known as a constructive vote of no confidence (CVNC). For now, if a successful no-confidence motion automatically leads to general elections, this thesis considers the executive to depend on the assembly's confidence.

1.2 Assessing Forms of Government as Descriptive Typologies

Colin Elman listed three major goals of a typology: descriptive, classificatory and explanatory (2005). The descriptive goal makes clear what each type in a typology is referring to. Elman himself used the example of parliamentarism VS presidentialism: What makes a parliamentary democracy different from a presidential democracy? Once we have clear definitions

of each type, we can then move onto the classificatory goal: assigning cases to the types. The final goal of “explanatory” is the perhaps the most impactful and methodologically difficult: making predictions based on the type classified. For example, Arend Lijphart famously claimed that consensus democracies are “kinder and gentler” than majoritarian ones (2012, 274).

The typology of form of government that this thesis requires only focuses on the first two goals. It is important to describe the fundamental differences amongst the form of government types and classify the 88 existing democracies into these types. The thesis does not attempt to use the typology to explain any economic or social performances of these forms of government: rather, the focus is on when democracies change from one type to another.

However, robustness is a concern for this thesis. An important default assumption is that form of government change is as rare as major electoral reform. To check for robustness, we need to look at the two major thresholds we use here: what counts as a unique form of government and which country counts as a democracy. This would be elaborated later in the thesis.

1.3 A Modified Sixfold Shugart’s Typology of Form of Government

This thesis’s sixfold typology is a modification of Matthew Shugart’s original $2 \times 2 + 2$ subtypes of semi-presidentialism model (2005). The presidential and assembly-independent systems are merged into one category. The two semi-presidential subtypes are merged as well. Category 1, 3, and 4 in Figure 3 below correspond to the four boxes in the 2×2 origin and survival model, with category 2 being all minimalist semi-presidential democracies (using Elgie’s definition).

| | Democratic forms of government: |
|----|--|
| 1. | Presidential & assembly-independent |
| 2. | Semi-presidential (minimalist) |
| 3. | Parliamentary |
| 4. | Elected prime-ministerial (Guyana) |
| 5. | Supermajority no-confidence vote (Bhutan) |

Figure 3 Current democratic forms of government (own work)

There are endless variations of hypothetical and creative forms of government, so I only focus on the forms of government that currently exist in the democratic world. I look at the forms of government of all countries that have at least 250,000 residents in December 2024 and listed as LD and ED on the latest V-Dem report (Nord et al. 2025). The population requirement only excluded Seychelles and São Tomé & Príncipe. I give exceptions to Papua New Guinea (PNG), listed as electoral autocracy (EA), and Guyana who is listed as EA+. There are three reasons for PNG's exception: PNG's "unbroken record of democratic government" since independence (May 2022); the most recent general election had no systemic fraud despite many irregularities (Wood et al. 2023); PNG has an innovative form of government that deserves attention. For Guyana, it has been seen as democratic since the first free and fair election in 1992 (Griffith 1997), as well as rated as "free" continuously since the early 2000s by Freedom House. It is currently the only "elected prime-ministerial" democracy in the world, albeit conducted with double simultaneous vote (Guyana 1980, Article 177).

The first four categories are widely accepted in the literature. All 86 democracies except Papua New Guinea and Bhutan can fit into one of the first four categories perfectly. PNG has had an 18-month grace period for a newly elected PM since the 1991 constitutional amendment. As the standard length of a parliamentary term in PNG is five years and early dissolutions are rare,

this would mean that about 30% of the time, PNG's executive branch is not accountable to the assembly. This can be described as a system that alternates between assembly-independent (Category 1) and parliamentary (Category 3).

Category 5 describes what happens when a parliamentary system decides to raise the threshold for a successful vote of no confidence (VONC) to more than 50%. Bhutan is the only democracy that has such a requirement: a VONC needs 2/3 of the entire membership of the lower house (Bhutan 2008, Article 17). Although Gerard Horgan still called Bhutan “unequivocally parliamentary” (2019, 87), this opinion would probably find little support among political scientists who study forms of government (Shugart 2025). A hypothetical scenario in which the National Assembly has a clear majority for an alternative PM but cannot dislodge the current one due to falling short of 66% is entirely possible, making it difficult to justify that Bhutan is still parliamentary in the sense that the PM is accountable to parliament.

Two other possible forms of government deserve to be mentioned here. The Japanese subnational system of government is a combination of Category 4 and 5: the governor and prefectural assembly are separately directly elected by voters, but the assembly has the right to pass no-confidence motions with an incredibly high 75% threshold (Japan, Local Autonomy Act, Article 178). This can strangely be a great alternative to impeachment for presidential systems: instead of the inevitable partisan judgments of the chief executive's wrongdoings by legislators, make the directly elected chief executive subject to a supermajority VONC. To terminate the mandate of a chief executive who has direct democratic legitimacy should require strong consensus in the assembly, which is to be expected in an “elected prime-ministerial” system.

Finally, there should be a hypothetical constitution in which an indirectly elected president is granted wide-ranging executive power along with a PM accountable to the assembly. This

possibility is the blind spot of the minimalist institutionalist model of semi-presidentialism: we presume that indirectly elected presidents are institutionally weak when they exist along a PM. Behaviourally, the early years of the French 5th Republic and Moldova under President Vladimir Voronin in the 2000s can be considered de facto semi-presidential (Darbaidze 2024) within a institutionalist parliamentary setup. Yet, there is no known example of a constitutional setup that unequivocally gives the indirectly elected president more executive power than the PM in writing.

1.4 The Six Democracies That Changed Form of Government

Similar to Renwick (2010), I look at democracies who changed form of government post-WWII. Alan Renwick imposed a high threshold for what he considered as “established democracy,” which he required to be continuously democratic from 1962 (the end of Huntington’s second wave of democratisation) to 2010. This is why Renwick excluded PNG’s shift from FPTP SMD to preferential voting in 2001, as PNG obtained its independence from Australia only in 1975 and for most of its post-independence history, Freedom House rated the country as “partly free.” Taiwan’s electoral reform in the 2000s was similarly excluded (Stockton 2010) due to its full consolidation of democracy only occurred in 1996 with the first direct presidential election. Greece and many Eastern European countries’ experiences with electoral reform during this period are absent as well.

There is a strong argument for focusing on mature democracies that have uninterrupted long-lasting periods of democratic governance, because this takes out the factor of reform happening during systemic ruptures (Katz 1980, 123; Nohlen 1984, 217). I agree with the spirit of this logic, which is why I exclude Slovakia, Georgia and Armenia from my list of countries who changed forms of government. Slovakia’s first general election in 1994 after splitting from its neighbour had credible results, but PM Vladimír Mečiar’s third term in office that followed was

widely considered autocratic (Haughton 2003). Then US Secretary of State Madeleine Albright famously described Slovakia as “a black hole in the heart of Europe.” This contributed to the growing polarisation between the government and the opposition, notably manifesting itself in the inability to elect the president in the first half of 1998 after multiple ballots. At that time, the constitution asked the National Council to elect the president with a 3/5 majority. After the September 1998 legislative election, a reformist anti-Mečiar coalition gained a majority and took power. The new PM Mikuláš Dzurinda quickly pushed forward constitutional reforms that paved the way for direct presidential elections in 1999. This would be a transition from parliamentarism to semi-presidentialism in this thesis’s typology, but it is clearly a classic case of form of government change that accompanies democratic consolidation. Thus, Slovakia is excluded. Georgia and Armenia have similar stories in that its form of government changes in its post-communist history were accompanied by ups and downs in democratic consolidation and backsliding (Oskanian & Averre 2018). Of course, Georgia would also be excluded because since the disputed 2024 general election, Georgia is widely viewed as not meeting the threshold for even a flawed democracy (European Parliament 2025).

This thesis differentiates from Renwick’s case selection approach in that a relatively broad definition of “uninterrupted democracy” is used. From the 88 LD+ED countries from the latest V-Dem report (Nord et al. 2025), the small island nations of ST&P and Seychelles are excluded due to the 250,000 population threshold, and Guyana and PNG are included. This thesis traces the 88 countries back to the start of the current period of democracy or 1945, whichever is later. Using the reasoning on Slovakia, this thesis does not consider cases of form of government change that occurred immediately within one or two years of democratisation. This leaves us with six

democracies that have changed forms of government since 1945: France, Papua New Guinea, Israel, Moldova, Czech Republic and Senegal. The six countries are listed in Figure 4 below.

| Democracies that changed forms: | | | | |
|---------------------------------|---------|---------------------------|---------------------------|--------------------------------|
| | Year | Old Form | New Form | Notes |
| France | 1958-65 | parliamentary | semi-presidential | presidentialisation |
| Papua New Guinea* | 1991 | parliamentary | alternation | deparliamentarisation |
| Israel | 1996 | parliamentary | elected prime-ministerial | hints of presidentialisation |
| | 2001 | elected prime-ministerial | parliamentary | backtrack |
| Moldova* | 2000 | semi-presidential | parliamentary | parliament taking back control |
| | 2016 | parliamentary | semi-presidential | backtrack |
| Czech Republic | 2013 | parliamentary | semi-presidential | hints of presidentialisation |
| Senegal* | 2019 | semi-presidential | presidential | presidentialisation |
| | 2021 | presidential | semi-presidential | backtrack |

*Heavily flawed democracies

Figure 4 Democracies That Changed Forms of Government post-WWII (own work)

The countries are listed by chronological order by which year they changed forms. France transitioned from the 4th to the 5th Republic in 1958 which strengthened the presidency but still kept the election of the presidency indirect. In 1962, a referendum to change the presidential election method to a direct popular vote succeeded, culminating in the first direct presidential election of the 5th Republic in 1965. However, there is some dispute as to whether French democracy was “interrupted” or not. Arend Lijphart considered the start of the continuous modern French democracy in 1958 (2012, 49). For this thesis, since there is no dispute that the 4th Republic was democratic, the transition in 1958 would not be seen as an interruption of democracy.

PNG gained its independence in 1975 and have been holding credible elections since. From the start, the constitution had a built-in clause that granted a 6-month grace period for a newly elected PM (Baker 2005). At this point, although we could say that PNG is 10% of the time assembly-independent and 90% of the time parliamentary, this would beg the question at what point we discount extremely short grace periods. Surely, a democracy would still be a pure parliamentary system even if a newly elected PM enjoys a constitutionally protected one-week

grace period. Since toppling the government after less than 6 months in office in the UK would mean a snap election if the British PM refuses to step down and the public would reasonably be frustrated at going to the polls twice in a six-month period, this thesis considers 1975-1991 PNG to be parliamentary. In 1991, a constitutional amendment was passed to prolong the grace period to 18 months (Ivarature 2022). This made it much harder to justify that Parliament still had proper control over the executive by the time we are in the 13th or 14th month of the PM's tenure. Thus, PNG is considered to have changed form of government in 1991.

Israel held three direct PM elections in 1996, 1999 and 2001. This short experiment with the “elected prime-ministerial” system was a solution invented in the early 90s to resolve the perennial deadlock in Israel's fragmented multi-party system (Ottolenghi 2001). Yet, Israeli politicians quickly realised that this solution did not work: the popular mandate the PM gained did not help with creating a workable majority in the Knesset to pass crucial legislation. Since this was not a presidential system, the Knesset still reserved the right to “pull the plug” on the executive and call for snap general elections. Shortly after the third direct PM election, Israel reverted back to a traditional parliamentary system for the 2003 general election.

Moldova is a borderline case: it was clearly a very fragile democracy in the 90s while it was going through the post-communist transition amidst polarisation between pro-Russia and pro-Europe forces (Roper 2008). The 1994 & 98 parliamentary elections and 1996 presidential election were broadly free and fair. At the turn of the century, boiling executive-legislative conflict came to a head: President Petru Lucinschi wanted constitutional reforms to enhance presidential power and essentially turn Moldova into a pure presidential system, a move that was deeply unpopular with the major parties in parliament. It did not help that Lucinschi was elected as an independent without party affiliation, thus lacking reliable parliamentary support. Lucinschi appealed to the

people by calling a referendum in May 1999 on his presidentialisation project. The result showed that nearly two-thirds of the voters approved of his initiative (Nohlen & Stöver 2010, 1330). However, the communists and non-communists in parliament came together to argue that the referendum was merely consultative and not binding, and quickly passed constitutional amendments to reduce presidential power, most notably by taking away popular legitimacy by changing the method of presidential election to an indirect one.

What was fascinating was that it was always clear that there was a strong majority in the public opinion in favour of direct presidential elections, yet Moldova managed to go through the first 16 years of the 21st Century without one. This is consistent with Salih Bayram's assessment that once you let the genie known as "form of government change" out of the bottle, this possibility would tend to become "a recurring theme" (2016, 14). There was persistent deadlock in parliament to reach the 60% threshold to elect a president in the 2000s, reaching a fever point in 2009-12, when Moldova was left without a president for two and half years. There was another referendum called in 2010 on this issue, asking voters whether they would like to have direct presidential elections again. It garnered an incredibly high 88% support for direct elections but failed to achieve the necessary turnout threshold of 33% to make it legally binding (ADEPT 2010).

The biggest plot twist in the end came in March 2016, when the Constitutional Court ruled that the 2000 amendment to switch to indirect presidential elections was void because proper procedures were not followed (Constitutional Court of Moldova). There is significant suspicion from legal experts that the judiciary caved to popular demands for direct elections (Secrieru 2016). This makes the 2016 Moldova form of government change unique in that it is the only one that was brought upon by a unilateral judicial decision.

Czech Republic went through the first two decades of its post-communist democratic history without direct elections for the president despite having strong voices in society championing such elections from the beginning (Kudrna 2011). These voices gained momentum in the first decade of the 21st Century when the parliamentary indirect presidential elections sunk into deadlock. Public anger over the supposedly non-transparent process of the indirect election reached a fever pitch during the 2008 presidential election, when credible allegations of bribery of and threats towards fellow legislators emerge during the horse-trading between the presidential election rounds (Kopeček and Mlejnek 2013). This was the last nail in the coffin that pushed through the reforms to implement popular elections for the president, with the first one being held in January 2013.

Senegal has been widely seen as one of the most stable Francophone African democracies since the wave of post-war decolonisation (Jakubiak 2022). The evolution of Senegalese democracy was gradual, starting from a de facto one-party state under President Léopold Sédar Senghor in the 1960s and 70s, to the gradual liberation of opposition participation in elections in the 80s and 90s, eventually culminating in the first peaceful transfer of power in the year 2000 to Abdoulaye Wade. Throughout this process, Senegal tinkered with its French-inherited semi-presidential system multiple times by abolishing and then reinstating the post of PM, essentially wavering between semi-presidentialism and pure presidentialism. Conservatively speaking, if we use the year 2000 as the watershed moment Senegal consolidated its democracy, then the two forms of government reform in Senegal that interest us in this thesis would be the 2019 abolishment of PM and 2021 reinstatement of the same post (Jakubiak 2022).

This extremely short “experiment” with pure presidentialism should be seen in the context of democratic backsliding. Freedom House scores for Senegal decreased steadily from 78/100 for

the calendar year of 2016 to 67/100 for the year 2023 (Freedom House 2024). President Macky Sall publicly toyed with the idea of running for a third presidential term in the early years of his second term, something that most legal experts view as unconstitutional. In addition, popular opposition leader Ousmane Sonko was sentenced to prison on rape charges that were viewed as politically motivated by his supporters. All these factors came together to agitate civil society to protest against democratic backsliding in Senegal. Therefore, the abolishment of the post of PM in 2019 was widely decried as a dictatorial move to reduce the checks and balances the National Assembly was supposed to provide against presidential power. Violence and the possibility of widespread civil unrest forced President Sall to announce mid-2023 that he would not run for a third term. Thus, we could see the reinstatement of the semi-presidential system in 2021-22 as civil society successfully pressuring the government to walk back attempts to consolidate power.

1.5 Checking Robustness

This thesis is claiming that among the 88 countries that are considered democracies by the end of 2024, 6 of them went through form of government reforms in their most recent interrupted democratic period. To check for robustness, we need to look at two things: the threshold for democracy and classification of form of government (typology). This thesis's model would be robust if by tinkering with these thresholds and classifications, the conclusion of "form of government change in democracies are rare" still holds.

1.5.1 Threshold for Democracy

The 88 democracies came from the 86 LD and ED countries in the latest V-Dem report (Nord et al. 2025) along with Guyana and PNG. However, V-Dem did not cover all existing countries with population above 250,000. Most notably, V-Dem excluded Belize, the Bahamas and Northern Cyprus. There is no doubt that the first two Anglophone Caribbean states are full

democracies as shown in their consistent Freedom House scores (Freedom House 2024). Despite being considered a “puppet state” of Turkey by some (Kurtulus 2005, 136), the Turkish Republic of Northern Cyprus (TRNC) has conducted remarkably free and fair elections since its unilateral declaration of independence (Freedom House 2020, *Northern Cyprus*). Although the latest presidential election featured unprecedented overt interference from the Turkish government in favour of pro-Turkey candidate Ersin Tatar against incumbent moderate president Mustafa Akıncı (Faustmann and Sözen 2021), the latest Freedom House report still ranks TRNC as much more democratic than Turkey. To test for robustness here, we can include Belize, Bahamas and TRNC in our list of democracies. They neatly fit into the forms of government we have (two parliamentary systems and a semi-presidential one) and never experienced form of government change since their respective independence days.

We can also restrict the definition of democracy, focusing on the ones that have been “mature” for prolonged periods of time. This thesis noticeably took a much more relaxed criteria in this area compared to Alan Renwick’s case selection (2010). As shown Figure 4 on p. 19, restricting our analysis to “mature democracies” would exclude PNG, Moldova and Senegal. One way to look at this is instead of focusing on all LD and ED countries in the latest V-Dem report, we only look at the LD and ED+ countries. This would mean 3 out of 46 mature democracies today have gone through form of government reform in the most recent uninterrupted democratic period. This again shows that form of government change in a democracy is rare.

1.5.2 Form of Government Typology Robustness

The fundamental distinctions between presidentialism and parliamentarism can be confusing to analyse, because scholars attribute many different characteristics to each. Here are some commonly cited differences between the two systems:

1. Confidence: A presidential system does not have such mechanism, while the executive of a parliamentary system always needs the assembly's confidence.
2. Fixed VS flexible terms: A typical presidential system involves rigid fixed terms for both the executive and legislative branches, while a parliamentary system usually has mechanisms for early elections.
3. Separation VS fusion of powers: Separation of powers is seen as one of the key checks and balances of a presidential system, while the executive's dependence on the assembly's confidence usually means there is no such separation in a parliamentary system.
4. Origin of the executive: Voters directly elect the executive branch in a presidential system, while parliament elects the PM in a parliamentary system.

Giovanni Sartori famously created the “ladder of abstraction” to systematically judge social science typologies (1970). The ladder shows three different levels of concepts: high level (HL) concepts are universal categories such as democracy and dictatorship. Low level (LL) concepts are very narrow and specific categories such as “Westminster parliamentary democracy” that are less universally applicable. Mid-level (ML) concepts are in the middle such as parliamentary democracy that would include Westminster democracies as well as Nordic parliamentary systems and Germany. The key takeaway is that as one climbs up the ladder, a concept extends by being able to apply to more cases but decreases its intension by including less attributes. In this process, Sartori warned against “conceptual stretching”: applying a narrow concept to more cases than it properly fits, therefore diluting its meaning.

Colin Elman built on this by explaining two techniques to refine typologies: extension and compression (2005). Extension means to add cells, rows or columns in a typology table. Extension increases coverage and nuance but sacrifices complexity. It can also create more empty cells. Compression merges categories together and make the typology table simpler. It reduces complexity and can help avoid empty or redundant categories, but it sacrifices fine-grained

distinctions. This thesis primarily uses the compression technique to refine form of government typology.

Let us look at the previously cited four typical differences between presidentialism and parliamentarism. Closely examining them makes us realise that the only truly important difference is the requirement that the executive depends on the confidence of the assembly. The main complaint towards presidentialism is about executive personalism (Linz 1990), which is solved by giving the assembly the power to terminate the executive's mandate. The origin of the executive is of secondary importance: The Surinamese president who is elected by the assembly can still wield executive power with little regard to the National Assembly. Thus, I merge the bottom two cells of Figure 1 on p. 3 from Matthew Shugart's typology (2005) together to create Category 1 in Figure 3 on p. 15. Lijphart's 3-dimensional form of government model (2012) can be reduced to two dimensions: the collective-unitary executive axis can be taken out because it produces empty cells and potentially circular logic.

1.6 Comparison with Bayram's Case Selection

Salih Bayram identified 8 democracies that went through form of government reform 1945-2014: Brazil 1961, France 1962, Sri Lanka 1977, Slovakia 1999, Moldova 2000, Turkey 2007, Kenya 2008 and Czech Republic 2012 (2016). France, Moldova and Czech Republic are common cases shared between this thesis and Bayram's selection. Senegal's 2019 and 2021 changes happened after Bayram's time of writing. However, PNG's 1991 instalment of the 18-month grace period and the Israel 1996-2003 direct PM election experiment were not considered by Bayram. In fact, these two countries were not mentioned at all in his paper. PNG was overlooked probably because scholars like Bayram did not consider the 1991 constitutional amendment to be a change of form of government. Perhaps the underlying assumption is that the 18-month grace period is a

form of restriction on the vote of no confidence, similar to other restrictions such as the requirement to propose an alternative PM candidate in a CVNC. Israel's experiment with direct PM elections probably was still considered as a variant of parliamentarism, as Bayram stuck to the threefold taxonomy of presidentialism/semi-presidentialism/parliamentarism.

This thesis does not include the cases of Brazil, Sri Lanka, Slovakia, Turkey and Kenya. Turkey is excluded because by the end of 2024, no major credible democracy-rating organisation still sees Turkey as a democracy (Nord et al. 2025). An alternative case selection scheme could focus on countries that used to be democratic and transitioned between forms of government during those democratic periods, although that would be out of the scope for this thesis. Brazil 1961 and Sri Lanka 1977 are excluded because their form of government transitions took place before the current democratic period. Brazil went through 21 years of military dictatorship starting in 1964, just one year after parliamentarism was revoked through a referendum (Nohlen 2005, 189). Sri Lanka went through almost 12 years without legislative elections after 1977, due to a controversial 1982 referendum that extended the life of parliament by six years (de Silva 1984). Newly elected president J. R. Jayewardene at the time knew that it was unlikely his party could maintain the supermajority in a parliamentary election, so he decided to use the referendum to extend the existing parliament's life, a move that is clearly undemocratic in nature.

Slovakia is not included because the change from parliamentarism to minimalist semi-presidentialism accompanied the reversal of democratic backsliding under Mečiar as explained previously. Kenya's experiment with semi-presidentialism 2008-10 is perhaps the most interesting case to exclude in this thesis. The level of democracy has fluctuated in Kenya since its independence, but what is unquestionable is that the results of the 2007 general elections were widely seen as illegitimate (Cheeseman 2008). Ethnic violence broke out in the aftermath, which

ultimately resulted in international mediation that brought the two leading presidential candidates together to negotiate a power-sharing agreement. This agreement created a temporary semi-presidential system in which Mwai Kibaki stayed as president while the runner-up Raila Odinga became PM. In 2010, Kenya promulgated a new constitution which re-established a fully presidential system, although new elections were held only in 2013. Thus, it is difficult for one to argue convincingly that Kenya was a democracy 2007-13.

1.7 Patterns of Form of Government Change in the Six Countries

Looking at the form of government changes in Figure 4 on p. 19, one can see two major patterns: presidentialisation and backtracking. Let us first discuss presidentialisation. 5 out of the 6 democracies in question move towards presidentialism one way or another. PNG implementing an 18-month grace period decreases the executive's accountability towards parliament, strengthening the PM's position, making it somewhat half-way between a Surinamese-style president and a traditional parliamentary PM. Israel's 1996 attempt to make voters elect the PM was about giving the PM direct popular legitimacy to gain more leverage over the Knesset in government formation. This reform supposedly turned the government formation process more akin to a president forming a broad coalition in order to pass legislation in a presidential system. Moldova is the only exception, in which parliament passed a constitutional amendment in 2000 to "de-popularise" the presidential election in order to "delegitimise" the president so that executive power stays with the PM who is accountable to the assembly. However, this "power grab" from parliament was a reaction to President Petru Lucinschi's desire to transition to a fully presidential system, fitting the overall pattern of democracies' tendencies to "presidentialise" during form of government changes.

In Salih Bayram's analysis of form of government changes, he pointed out that once a democratic change of form of government is achieved, "regime change becomes an almost permanent fixture on the political agenda." (2016) This is evident among this thesis's six case countries, in which three of them experienced backtracking: Israel, Moldova and Senegal. In Israel, the Knesset realised that giving the PM a direct popular mandate does not solve the root causes of partisan deadlock, thus reverting back to traditional parliamentarism. In Moldova, the judiciary was widely seen as pressured by public opinion to reinstall direct presidential elections. Similarly in Senegal, civil society and opposition groups successfully pressured President Macky Sall to walk back efforts to consolidate power in the president's office.

Chapter 2: Alan Renwick's Reform Model

Alan Renwick studied when major overhauls of electoral systems happen in a democracy (2010). He concluded that such overhauls only happened six times in four mature democracies 1945-2010: France 1985 & 86, Italy 1993 & 2005, New Zealand 1993 and Japan 1994. To study these six reforms, Renwick built a detailed framework that focused on the actors and motivations of each reform and the process itself. To build this framework, Renwick referenced electoral reforms of all types across the world throughout the last few centuries. To summarise this framework, we could break it down into four parts: types of reform, actors' motivation, exogenous factors that impact the reform process and endogenous factors.

2.1 Two Types of Reform: Elite Majority Imposition & Elite-Mass Interaction

To categorise types of reform, Renwick started by asking whether politicians initiated the reform process or not. In other words, did the reform happen because politicians themselves wanted it or because they were pressured by other actors? Figure 5 below shows how this question leads to more detailed categorisation.

| Does the majority of politicians retain control? | | | | |
|--|-------------------------|-----------------------------------|----------------------------|------------------------------|
| Yes | | Partially | No | Politicians lose control to: |
| Elite majority imposition | Elite settlement | Judicial decision | | judges |
| | | Elite-external interaction | External imposition | external actors |
| | | Elite-mass interaction | Mass imposition | ordinary citizens |

Figure 5 Types of Reform (Renwick 2010, 11)

If politicians willingly initiate and control the process, there could be two types: a reform that is about increasing the political advantage of one group (which in this case would be the seat share) at the expense of another group and a reform that is about creating equitable distribution of seats among previously hostile political camps. Renwick called the first type “elite majority

imposition” because the majority group among the politicians “imposed” this new system over the minority and the public. An example would be the largest party in a PR system using its temporary majority to switch the system to a majoritarian one in order to gain an edge over the divided opposition in the upcoming election. The second type was called “elite settlement” because there is a sense of compromise and consensus among the major groups in the assembly to create an equitable distribution of seats. Yet, both these types emphasise that politicians acted independently in the process without significant outside pressure.

The alternative is for politicians to be pressured into starting the reform and/or lose control over the process. The question then becomes which groups of people are able to do so. Renwick identified three groups: judges, foreign powers and ordinary citizens. Electoral reform can theoretically happen due to judicial ruling: in UK and Canada, third parties had launched petitions to the courts saying that FPTP SMD unfairly grants disproportionate power to the two largest parties (Renwick 2010, 13). Foreign influence on electoral system design can be prominent when there is international mediation and pressure in post-conflict societies. Finally, ordinary citizens can pressure unwilling politicians to initiate reforms by sustained public advocacy. In Renwick’s assessment, reforms happening due to judicial decisions or foreign influence are rare. What is more common is grassroots agitation pressuring the political class to conduct reform. Even then, Renwick pointed out that such reforms almost always require some degree of collaboration of certain politicians with the public (2010, 16). As such, this would be a case in which politicians retain partial control, creating the reform type known as “elite-mass interaction.”

The six major electoral reforms that Alan Renwick analysed are evenly split between elite majority imposition and elite-mass interaction. He implied that most fundamental reforms in mature democracies should be one of these two types.

2.2 Motivation for Reform: Power VS Values

Why would a politician support and pursue electoral reform? Renwick claimed there are two possible motives: power and values. A politician might push for reform because they think they could gain more power in the new system. On the other hand, another politician might push for the same reform because they think it is the right thing to do: perhaps the new system is seen as fairer or more democratic—politicians are not always egotistical after all! Figure 6 below shows Renwick’s model when it comes to power as a motivation, while Figure 7 is about the possible values an actor can fight for.

| <i>(a) Parties</i> | | |
|------------------------------------|---|---|
| Objectives | Aspects of reform | |
| | Outcomes | Act |
| I Voter preferences | (a) Importance of candidate-, party-, and leader-centred competition | (b) Answering voters' desire for reform (c) Avoiding reforms seen as illegitimate |
| II Votes | (a) Psychological effect (b) Intra-coalition candidate distribution (coalition effect) | |
| III Seats | (a) Mechanical effect | |
| IV Office | (a) Ensuring favourable coalition dynamics | (b) Retaining/securing coalition allies |
| V Influence | (a) Enhancing party's intra-coalition influence (b) Splitting one's opponents | (c) Securing other policy goals (d) Retaining legitimacy (e) Minimizing transaction costs |
| <i>(b) Individuals</i> | | |
| Objectives | Aspects of reform | |
| | Outcomes | Act |
| VI Re-election | (a) Fit between system and personal resources | (b) Answering voters' desire for reform (c) Avoiding reforms seen as illegitimate |
| VII Intra-party power | (a) Intra-party power of backbenchers and leaders | (b) Building personal credit within the party |
| VIII Influence in political system | (a) Reconfiguring the party system | (b) Attracting potential allies in other parties |

Figure 6 Typology of Power-Seeking Considerations (Renwick 2010, 30)

| Values | Aspects of reform | |
|------------------------|--|--|
| | Outcomes | Act |
| I Democracy | (a) Fair distribution of seats (b) Avoidance of anomalous results (c) Fair distribution of power (d) Representation of society (e) Voter choice (f) Accountability of governments (g) Accountability of individual politicians (h) Checks and balances (i) Encouraging effective political parties (j) Simplicity | (k) Democratic process of system choice (l) Constitutional process of system choice |
| II Stability | (a) Avoidance of inter-group conflict | (b) Avoidance of conflict/deadlock over choice of system |
| III Governance | (a) Efficient decision-making (b) Effective scrutiny of decisions (c) Avoidance of corruption (d) Avoidance of money politics | |
| IV Policy outcomes | (a) Economic policy objectives | |
| V Constituency service | (a) Quality of constituency service | |
| VI Identity | (a) Affirmation of links with national tradition (b) Affirmation of links with favoured states | |
| VII Practicability | (a) Administrative simplicity | |

Figure 7 Values in Reform (Renwick 2010, 39)

2.3 Reform Process: 3 Steps and 6 Exogenous Factors

The electoral reform process in any democracy is a long one. Renwick identified three steps in the reform process:

Step 1: A variety of power interests and values motivate different actors to different degrees.

Step 2: Once the motivation for reform is there, specific motivations cause actors to prefer certain electoral systems over others. For example, there can be a consensus on getting rid of the existing FPTP SMD, but different actors might prefer different alternatives for the new system, such as

ranked choice voting and list PR. This was notoriously Canadian PM Justin Trudeau's reason for stopping the electoral reform process after promising to make the 2015 federal election the last one conducted with FPTP SMD (Dias 2017).

Step 3: Once they have a preferred system to replace the old one, actors make the final push to make the electoral system change a reality.

Similar to the Canadian example, many other democracies have considered electoral reform at some point, but they eventually did not push through. The question then becomes what factors impact the success of the electoral reform process. Renwick listed six factors that are exogenous to the process itself: history, ideational change, nature of the party system, state institutions, events & circumstances and nature of actors (2010, 47). In each of the three steps listed above, Renwick analysed the substeps of each step through these six exogenous factors.

2.4 Reform Process: 2 Endogenous Factors

Renwick also pointed out that there are factors endogenous to the reform process. The two factors he focused on are leadership and path dependence. A big factor in the rare case of a successful electoral reform is strong leadership from a few of the reform activists. This could be the PM/president of the country, party leaders, civil society leaders or social activists. To get public opinion or a majority of parliamentarians on board with the idea, it is important to have charismatic leaders using persuasion techniques to convince their audience to join the pro-reform camp.

Path dependence is the idea that once a certain train of thought is set, it might go into a direction that actors cannot control. The government might set up a parliamentary committee to explore electoral reform to appease certain groups, thinking that people might forget about it later. However, this committee could be the catalyst of new public awareness of electoral reform and spirals into something that none of the politicians wanted in the first place.

2.5 Other Scholars' Comments and Expansion on Renwick's Model

Renwick's model (2010) immediately made an impact in the electoral reform scholarship, with three prominent papers in 2011 engaging with different aspects of the model:

4. Gideon Rahat and Reuven Y. Hazan built a framework on barriers to electoral reform (2011). This novel approach takes the desire for electoral reform as a given in some democracies and looks at what are the key impediments to it. Barriers such as “political tradition” and “vested interests” directly mirror Renwick's building blocks, in this case being Figure 7 (p. 34)'s actors' motivations being driven by values such as Row VI Identity (a) affirmation of links with national tradition.
5. Hazan furthered his work on electoral reform by partnering with Monique Leyenaar to write about the history of the study of electoral reform and how it should be studied in the future (2011). Hazan and Leyenaar agree with Renwick's approach that focuses on the inputs rather than outcomes of electoral reform: that is, what causes reform to take place in the first place. They synthesised Renwick's model with other pieces of literature that focus on “minor” reforms such as changing the electoral threshold and abolishing mandatory voting.
6. Jean-Benoit Pilet and Damien Bol did a quantitative study of the preferences of 84 parties in 13 electoral reform debates to dissect actors' preferences (2011). They directly invoked Renwick's elite majority imposition reform's building blocks, particularly the simple notion that parties are seat share-maximising, with the caveats of legitimacy constraints and intra-party power struggles among other things as shown in Figure 6 on p. 33. Pilet and Bol's analysis gave strong support to some of the 19 propositions associated with the 3 steps and 6 exogenous factors Renwick listed when translating actors' motivations to outcomes (2010, 65).

More recent scholarship invoked Renwick's model to conduct large-N quantitative studies, such as Ignacio Lago and Ferran Martinez i Coma's work on short-term effects of electoral reform (2023). While Renwick underscores the frequency of unintended effects, their study shows that outcomes are systematically conditioned by contextual variables such as electoral turnout prior to reform. This introduces a new layer of contingency into the model, suggesting that reforms do not yield uniform consequences across contexts but instead interact with pre-existing political

conditions. Their findings thus qualify Renwick's argument by adding predictive nuance to the study of post-reform effects.

Taken together, these works move beyond Renwick's original framework the following directions: by modelling the barriers that inhibit change (Rahat and Hazan 2011), by conceptualising reform more broadly (Leyenaar and Hazan 2011), by empirically testing and refining party-centred hypotheses (Pilet and Bol 2011), and by incorporating contextual conditionality into the analysis of reform outcomes (Lago and Coma 2023). While none of these contributions overturn Renwick's model, they collectively extend its scope, specify its mechanisms, and render it more sensitive to the diversity of reform processes across time and space.

Chapter 3: Applying Renwick to Form of Government Reform

Renwick's electoral reform model is built on three analytical pillars: (1) who controls the reform process, (2) whether actors are motivated by power or values, and (3) how these motivations shape concrete reform choices. To adapt this model from the electoral arena to the realm of form of government reform, the same logic can be applied, but with institutional rather than electoral outcomes in mind. In this section, Renwick's model is adjusted to the special circumstances involving form of government reform. Then, the six case countries' experiences with form of government reform are analysed through the new model.

3.1 A Form of Government Reform Model

First, the control dimension remains relevant. In many cases, political elites retain control over institutional reform, for example when constitutional amendments are adopted by parliamentary supermajorities or negotiated settlements among ruling parties. Yet there are also cases where elites partially lose control—such as when reform outcomes are strongly influenced by mass mobilization or external actors (e.g. EU accession pressures). And sometimes elites lose control entirely, as when courts or revolutionary movements impose new institutional structures. Thus, the core distinction between elite imposition, elite settlement, elite–mass or elite–external interaction, judicial decisions, external imposition, and mass imposition continues to map onto government reform. This is summarised in Figure 8 below.

| Control Outcome | Types of Reform | Example in Government Reform |
|------------------|--|---|
| Yes | Reform as redistribution of powers → <i>Elite majority imposition</i> | Strong majority amends constitution to strengthen presidency |
| | Reform as efficiency mechanism → <i>Elite settlement</i> | Parties agree on semi-presidentialism to reduce deadlock |
| Partially | <i>Elite–mass interaction</i> | Popular demand for directly elected president shapes compromise |
| | <i>Elite–external interaction</i> | EU or donor pressures influence constitutional design |
| No | <i>Judicial decision</i> | Constitutional court mandates institutional change |
| | <i>Mass imposition</i> | Revolution or referendum forces adoption of new system |
| | <i>External imposition</i> | Peace settlement or foreign occupation dictates system |

Figure 8 Types of Form of Government Reform (own work based on Figure 5 on p. 30)

Second, power-seeking motivations require reframing. In electoral reform, power incentives are often understood in terms of votes, seats, and office. For government reform, however, elites calculate not only how institutions will affect their electoral fortunes but also how they will shape the distribution of powers across branches of government. For example, parties may support semi-presidentialism to secure cabinet positions while simultaneously introducing a directly elected president to harness popular legitimacy. Individual politicians may push reforms

that align with their personal strengths: a charismatic leader may favour presidentialism, while parliamentary elites may prefer strengthening the legislature. In short, what Renwick saw as seat maximization can here be understood as power redistribution across executive and legislative arenas. This is summarised in Figure 9.

| Objective (Parties) | Outcome | Act (in Government Reform Context) |
|-----------------------------------|---|--|
| I. Voter preferences | (a) Boosting legitimacy through leader-centred competition | (b) Creating direct election of a president |
| II. Power distribution | (a) Securing favourable balance between president, PM, and parliament | (b) Adopting semi-presidential compromise |
| III. Office | (a) Ensuring access to cabinet/executive positions | (b) Negotiating institutional roles to retain coalition allies |
| IV. Influence | (a) Enhancing party's leverage in policy or appointments | (b) Strengthening presidency/parliament to weaken rivals |
| Objective (Individuals) | Outcome | Act (in Government Reform Context) |
| VI. Personal leadership | (a) Fit between personal resources and system (charisma → presidency) | (b) Advocating direct election of president |
| VII. Intra-party power | (a) Shifting balance between backbenchers and leaders | (b) MPs resisting strong presidency to preserve parliamentary role |
| VIII. Influence in system | (a) Repositioning within political system | (b) Supporting reforms that create new institutional footholds |

Figure 9 Typology of Power-Seeking Considerations in Form of Government Reform (own work based on Figure 6)

Third, value-based motivations also translate, though with a different emphasis. When framed in value terms, government reform debates typically concern fairness, accountability, stability, and identity. Rather than seeking fairer seat distribution, reformers may stress fairer institutional balances of power; rather than stability in electoral outcomes, they may argue for avoiding executive–legislative deadlock. Governance values may highlight efficiency versus accountability trade-offs (e.g. presidential decisiveness vs. parliamentary scrutiny). Reformers may also appeal to identity—either by rooting proposed systems in national traditions or by aligning with international models. Here, as in electoral reform, “values” can be genuine or strategically invoked to legitimize reforms that primarily serve power interests. This is summarised in Figure 10 below.

| Value | Outcome (Government Reform Context) | Act |
|-------------------------|--|--|
| I. Democracy | (a) Fair distribution of powers between institutions (b) Accountability of executive and legislature (c) Checks and balances | (k) Democratic or constitutional process of institutional choice |
| II. Stability | (a) Avoidance of executive–legislative deadlock (b) Prevention of inter-group conflict | (b) Avoidance of paralysis through institutional design |
| III. Governance | (a) Efficient decision-making (b) Effective scrutiny of decisions (c) Avoidance of corruption | (–) Promoting presidential decisiveness vs. parliamentary accountability |
| IV. Policy outcomes | (a) Linking system choice to economic reform capacity | (–) Advocating system portrayed as pro-reform |
| V. Constituency service | (a) Citizen access to decision-makers | (–) Direct presidential elections framed as empowerment |
| VI. Identity | (a) Alignment with national traditions (b) Adoption of foreign models | (–) Justifying reform as continuity or modernization |
| VII. Practicability | (a) Administrative clarity and simplicity of system | (–) Promoting easy-to-understand division of authority |

Figure 10 Values in Form of Government Reform (own work based on Figure 7 on p. 34)

Taken together, Renwick's model adapts well to government reform if one shifts the analytical focus from the translation of votes into seats to the translation of authority into

institutional power. What remains constant is the interplay between who controls the reform, and whether actors are motivated by power, values, or some mixture of both.

3.2 Applying the Model to the 6 Case Countries

Applying the adapted Renwick framework to nine episodes of government reform highlights both the versatility of the model and the distinctive dynamics of institutional design beyond electoral rules. The central question in each case is whether elites retained control over the reform process, shared it with other actors, or lost it entirely. On this basis, the reforms can be divided into elite majority impositions, elite settlements, elite–mass interactions, and judicial decisions. A significant caveat should be noted here: The scope of this thesis does not allow an in-depth dissection of the step-by-step process of each reform process. A thorough process-tracing qualitative study is required to conclusively judge the typology of each reform case. The categorisation here is an estimate based on available scholarship on these six countries. We can see this in Figure 11 below.

| Episode | Reform | Typology | Justification |
|---------------|--|---------------------------|---|
| FR 1958–65 | Transition from the 4 th Republic to the 4 th Republic | Elite majority imposition | De Gaulle and allies dominated constitution-making, with popular referendums used to ratify. |
| PG 1991 | Introducing 18-month grace period on no-confidence votes | Elite settlement | Parliamentary elites negotiated a stability-enhancing bargain; not a mass or judicial intervention, but a negotiated intra-elite rule change. |
| IL 1996 | Adoption of direct PM elections | Elite settlement | Parties in the Knesset compromised on a new arrangement expected to strengthen the PM, without external or judicial imposition. |
| IL 2001 | Abolition of direct PM elections | Elite settlement | Same elite actors reversed course when consequences proved destabilizing; a negotiated elite-driven rollback. |
| MD 2000 | Shift from semi-presidentialism to parliamentarism | Elite majority imposition | Parliamentary parties pushed reform to weaken the presidency and consolidate power in legislature. |
| MD 2016 | Reinstatement of direct popular elections of the president | Judicial decision | The supreme court ruled that the 2000 amendment to abolish popular presidential elections did not follow proper procedures, so it was void. |

| | | | |
|------------|---|------------------------------|--|
| SN 2019 | Abolition of PM | Elite majority imposition | President Sall and his parliamentary majority imposed the reform to concentrate power in the presidency. |
| SN 2021 | Reinstatement of PM | Elite majority imposition | Same elite majority reintroduced PM post, mainly for coalition management and patronage distribution. |
| CZ 2013 | Introduction of direct presidential elections | Elite–mass interaction | Reform came after popular demand for a directly elected president; elites implemented it to preserve legitimacy and defuse pressure. |

Figure 11 The type of reform for the 9 cases (own work based on Figure 5 on p. 30)

The most common pathway was elite majority imposition, where ruling actors exploited their control of constitutional or legislative procedures to redistribute authority in their own favour. This pattern is evident in France under Charles de Gaulle between 1958 and 1965, where the founding of the Fifth Republic and the subsequent introduction of direct presidential elections were elite-driven initiatives. Although referendums provided popular legitimation, the reforms were firmly controlled from above. Similarly, Senegal’s reforms of 2019 and 2021—abolishing and then reinstating the post of prime minister—were carried out by President Macky Sall and his parliamentary majority to recalibrate executive power. Moldova’s 2000 reform likewise falls in this category, with parliamentary actors curtailing the presidency to secure greater legislative dominance. In all four cases, elites imposed constitutional changes that redistributed authority within the system without significant external or mass imposition.

A second cluster of cases is best described as elite settlements, where reforms were negotiated compromises among parliamentary actors rather than unilateral impositions. Papua New Guinea's 1991 introduction of an eighteen-month grace period against no-confidence votes exemplifies this type. The reform was designed by parliamentary elites to stabilize fragile coalitions and reduce the high turnover of prime ministers (May 2022). Israel's adoption of direct prime ministerial elections in 1996, and their abolition only five years later, also fits this pattern. In both instances, the Knesset arrived at negotiated arrangements to address perceived problems of governability, first by strengthening the prime minister and later by restoring parliamentary authority when the reform produced unintended consequences (Ottolenghi 2001).

Two cases illustrate the erosion of elite control. The Czech Republic's 2013 adoption of direct presidential elections can be classified as elite–mass interaction: while parliament enacted the reform, it did so in response to persistent public demand for a directly elected head of state. Here, elites yielded to mass pressures to preserve legitimacy, even though the institutional consequences of the reform were relatively modest. Moldova's 2016 reform represents the only instance of judicial decision in this sample. By restoring direct presidential elections, the Constitutional Court rebalanced the system in ways that were not initiated or controlled by the main political actors.

Taken together, these nine episodes show that government reform—like electoral reform—rarely emerges from purely technocratic reasoning or “value” concerns alone. Instead, reforms are typically driven by power calculations, with elites seeking to redistribute authority in ways that favour their own positions, while legitimating their choices through value-laden arguments about democracy or stability. The adapted Renwick model thus provides a structured lens for comparing diverse experiences, revealing recurring logics across very different national contexts.

Conclusion

This thesis can be seen as applying an established electoral reform model onto the relatively untouched area of form of government reform in democracies. Alan Renwick's model (2010) is applied to form of government reform in interrupted democracies, an area of research previously pioneered by Salih Bayram (2016). This thesis categorised 9 cases of reform in 6 democracies using Renwick's typology of elite majority imposition, elite settlement, elite-mass interaction and reform by judicial decision. However, this is only the beginning. To completely execute Renwick's model in form of government reform in democracies, detailed qualitative work needs to be done to examine the step-by-step reform process in these six countries. This thesis hopes that future scholars can apply the model to conduct the qualitative work needed to the six case countries to fully understand why and how form of government reform occurs.

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