

TURKEY'S SEARCH
FOR A NEW

04

POLITICAL
SYSTEM

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SEMI-PRESIDENTIAL
SYSTEM AND THE
CASE OF TURKEY

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PREFACE

The system debate is arguably the most pressing and consequential subject of Turkish politics. Turkey has been having a governmental system discussion for a period of time, and the next few years will appear to be in intense debate and search.

Turkish parliamentary system experience (1876-2017) often dealt with interruptions. As a result, it has not only failed to produce general satisfaction in politics and society but also has been unsuccessful in yielding economic stability. Similarly, the outcome of the last five years of the Presidential Government System (or the Presidential System with its widespread use) could not generate stability.

The parliamentary system has had a hostile place in public memory. Because it is usually associated with military coups, the weakness of civil politics, military and civil bureaucracy tutelage over elected bodies, fragile and inconsistent coalition governments. Usually, instead of dealing with the structural shortcomings of Turkish democracy, bashing the parliamentary system was a safe debate tool under the military tutelage years. The shortcut savior happened to be the presidential system. It was supposed to protect Turkish democracy from military tutelage, political instability or coalition governments. During the 1980s and 90s, strong political leaders, such as Demirel and Özal, voiced that the parliamentary system was malfunctioning, and that Turkey should move into the presidential system. However, despite such occasional political and academic disclosures, the system change did not become a serious part of the public agenda until 2014.

The most significant break in system change occurred in the Presidential elections in 2007. As the reactions to Abdullah Gül's Presidential candidacy turned into a severe political crisis over the April 27, 2007 memorandum and the decision of the Constitutional Court to block his candidacy; the AK Party has turned to change the presidential electoral system.

The constitutional amendment electing the President by the people instead of the parliament in a referendum also gave solid political capital to the President. This new election system gave the President legitimacy of representing at least 50% of the voters. Moreover, it empowered him to push the boundaries of the classical parliamentary system with the 1982 constitution and symbolic role of the President.

Erdoğan as the first president elected directly by the people, has adopted a persistent policy of switching to the presidential system. For years, the presidents elected through parliament experienced a severe political clash with the elected governments due to their constitutional powers. The new system empowered the President with two additional power dynamics: being elected by the people (Erdoğan received 52 percent) and having a ruling party in the parliament. Ironically it was not only a new power surge but also paved the roads to new clashes and rifts between elected bodies.

Between 2014-2017, the anomaly caused many political crises. After the July 15 coup attempt, the deadlock was attempted to be resolved in line with the presidential system through the initiative and support of MHP leader State Bahçeli with the motto "de facto situation should be de jure." Without much public debate, the constitutional amendment, drafted in line with the preferences of the AK Party and MHP, was adopted with 51 percent support on April 17, 2017, referendum while the July 15 coup trauma was still in effect.

The presidential system, which took effect in the June 24, 2018 elections, has also produced a high dissatisfaction over its political and administrative performance since 2018. It has been criticized for the unification of powers, weakening the checks-and-balances mechanisms, eroding the political party identities, pushing them to establish alliances, and deepening polarization. In addition, the ruling bloc, which favors

the presidential system, has avoided revisions that will make the current system more operational, and further deepened the system's discomfort.

Public opinion studies show that support for the presidential system has fallen to 35 percent, and a possible referendum on the return to the parliamentary system will gather powerful support. Opposition political parties had a window of political opportunity created by dissatisfaction with the system. It helped opposition parties to develop a political strategy and rhetoric through the return to the parliamentary system. It allows many political parties with different political priorities to act together on the same goal while camouflaging the motivation to defeat Erdoğan in elections. They are currently asking to return to the parliamentary governmental system creating a political rhetoric on the axis of authoritarianism-democracy. In this framework, the system debate and the goal of restarting the parliamentary system have become the essential issue of the political struggle between the ruling and the opposition blocs.

Starting from 2021, the opposition political parties have prepared and publicly disclosed their parliamentary system proposals. This year they formed a joint working group and agreed on the basic principles, and finally presented the public "Strengthened Parliamentary System" proposal. Now six opposition parties decided to gather at the leadership level monthly—their main agenda focusing on governmental system change. It is a game-changing step in a fractured and highly polarized Turkish political atmosphere. Will the goal of returning to the parliamentary system be good enough to keep opposition parties united in the face of the ruling alliance, is questionable. However, it would be fair to argue that the parliamentary system proposal may ripen into the political alliance of opposition.

The search and discussion of the governmental system appear to be the most critical topic of politics for the next few years. Regardless of the outcome of the June 2023 elections, the system debate will be the most crucial topic of politics in the short term. If the current ruling alliance wins, they need to reform the system. If the opposition wins, they need to keep their election promise to change the system. In any scenario, Turkey is heading towards either imposing alterations or structural reform. Therefore, the system debate will settle itself as one of the top political issues in Turkey in the coming years.

Meeting this demand and preparing enhanced research on the governmental system will play an essential role in the quest for a possible change. Comprehensive research should present a comparative, global, political, and constitutional base for the debates and assist decision makers in political parties and the public in finding an enriched discussion floor.

Within the framework of this program, Ankara Institute plan to publish ten academic analyzes that will contribute to the search for systems over the next year in order to meet this end.

The research plans to conduct two workshops with the participation of stakeholders that we predict will contribute to the system discussion and hold a detailed public opinion survey.

This study in which Tolga Şirin evaluates the semi-presidential system through the theoretical principles, implementation of the international experiences as well as its practicality in Turkey is the fourth of the academic contribution series that made out of 10 reports.

Over the next year, we believe that this research project, which will continue through analysis, workshops, and public surveys, will contribute significantly to the quest for a system that progresses only through the harsh contrasts of government versus opposition parties dynamics and provides qualified academic background, common sense consultancy, and poll data.

INTRODUCTION

Systems of government are not often explicitly prescribed in constitutions. When we look at the constitution of a state, we often see clearly whether the state is federal or not, what rights and freedoms it recognizes, and how laws are amended. But this is not the case with the system of government. In constitutions, the name of the governmental system is, as a rule, not expressed. In order to understand which of these categories a state falls into, it is often necessary to focus on the legislative and executive relations and make a holistic deduction from the articles (or even the application) on the matter. In short, unlike many other constitutional issues, the topic of government systems relies to a great extent on the subjective understandings of researchers.

In the analysis of systems of government, there are two basic models that researchers have traditionally agreed upon. The first is the presidential system, the prototype of which is represented by the United States of America (USA); the second is the parliamentary system, the prototype of which is represented by the United Kingdom. For many years, researchers and even politicians have traditionally categorized systems in various countries according to this dichotomy. Later on, this tradition changed with the French political scientist Maurice Duverger's designation of the political system introduced by the 1958 Constitution of France (V. Republic) as a "semi-presidential government", and the discussions surrounding it.¹ Duverger's approach was not warmly welcomed in his home country, and it was met with objections to the effect that the category of "semi-presidential government" was a mere fantasy and that a particular type of parliamentary regime was in force in France. This objection can still be heard in some circles today.² Nevertheless, based upon the criticisms it received, the abovementioned "Duvergerian" analysis was improved through deeper discussions and became generally accepted at the international level. As a result, the semi-presidential form of government is expressed by many respected researchers as a unique model separate from the presidential and parliamentary systems.

The present study assumes that the semi-presidential government is a distinctive model separate from the presidency and parliamentarism. The study aims to question its applicability as a system of government in Turkey.

1 The leading text is: Maurice Duverger, "A New Political System Model: Semi-Presidential Government", *European Journal of Political Research*, Vol. 2(8), 1980.

2 Adolf Kimmel, *Das politische System der V. französischen Republik: Ausgewählte Aufsätze* (Nomos Verlag, 2014).

The plan of the study is as follows: First of all, the outline of the semi-presidential government system is to be drawn. The first chapter titled “Outline of the Semi-Presidential System” is composed of; introduction, definitions, cases of semi-presidential government, subcategories, the divided government problem, cohabitation, intermediary conclusions. The second chapter titled “The Practicability of Semi-Presidential System in Turkey” is to be reviewed in the light of a significant element of this system, “historical traditions of Presidency”; as well as “semi-presidential government in practice” as Turkey has experienced recently; and three concepts with significant importance vis-à-vis semi-presidential government, namely, “political polarization”, “features of political parties”, and “government stability”.

OUTLINE OF THE SEMI-PRESIDENTIAL SYSTEM

I. DEFINITIONS

There isn't an undisputed definition of semi-presidential government³ – so much so that a substantial amount of literature exists on the subject. Even though it is not possible to exhaust all that had been written on the topic, to have a clear understanding of it, it is necessary to outline the commonly accepted definitions and to point out the outstanding discussions.

In this respect, first of all, it is necessary to address the context of the emergence of the concept. It is said that the concept in question was first used by the French journalist Hubert Beuve-Méry in an article written for the newspaper *Le Monde* on January 8, 1959, to describe the system introduced by the fledgling 1958 French Constitution.⁴ The person who systematized the concept and made it famous is French political scientist Maurice Duverger.⁵ The main argument of the author, who will later deepen his views on this subject with various works and polemics, is that the order introduced by the 1962 amendment to the 1958 Constitution (which is still in force today) deviates from parliamentarism to such an extent that it needs to be considered in a separate category from democratic political regimes.

There isn't an undisputed definition of semi-presidential government. The person who systematized the concept and made it famous is French political scientist Maurice Duverger.

3 This study observes a distinction between the concept of “system” and that of “regime”. System is an umbrella concept that includes the relations between the powers and the political regime, but also considers the political parties, the press, other interest groups, and the social structure. Political regimes, on the other hand, refer to sub-forms of authoritarian, totalitarian, or democratic in the relationship between the state and society. Parliamentarism, presidency, and semi-presidential government in the focus of the study are types of democratic political regimes.

4 Hubert Beuve-Méry, “De la dictature temporaire au regime semipresidentiel”, *Droit, institutions et systemes politiques. Melanges en hommage a Maurice Duverger* (Presses Universitaires de France, 1987), p. 533, as cited in Robert Elgie, “The Politics of Semi-Presidentialism”, in Robert Elgie (ed.), *Semi-Presidentialism in Europe* (Oxford University Press, 2004), p. 1.

5 The author first used the concept in 1970, developed it in 1974, and finally explained it in full in 1978. In his earlier works, Duverger seems to have argued that in order to strengthen the executive, new powers should be given to the prime minister, not the president, and that the prime minister should also be elected by the people.

The author is not wrong on this point. The constitution in question was prepared under the guidance of General Charles de Gaulle, who became head of government after an uprising broke out in Algeria, then a colony of France.⁶ One of the main goals of the general, who was given full authority to draft a new constitution as soon as he became head of government, was to create a strong executive against the governmental stability delivered by the 1946 Constitution (the IV Republic). For this purpose, he wanted the legitimacy of the presidency to be strengthened through popular elections, and for the presidency to be equipped with strong powers in parallel with this strengthened legitimacy. The general succeeded in his aim. However, the resulting change went so far that it became rather difficult, if not impossible, to define the system in question as “parliamentarian”, considering the powers held by the president.

This is where Duverger’s determination comes into play. According to the author, the new system in France was similar to the political regimes structured by the 1919 Finland, 1919 Weimar, 1920 Austria, 1937 Ireland, and 1944 Iceland constitutions. Such regimes have three characteristic elements.⁷

The president:

- i. is directly elected by universal suffrage;
- ii. possesses quite considerable powers;
- iii. shares the executive branch with a government composed of a prime minister and ministers who stay in power unless the legislative branch opposes.

Despite being discussed for many years, these elements were accepted in the literature in one way or another. However, the diversity of these definitions and discussions increased noticeably after the 1990s. This increase is also an outcome of dialectical discussions towards Duverger’s definition, especially in English-language literature.⁸

A. Theses and Antitheses

Criticisms of the semi-presidential government are twofold, either directed toward the elements of it or the concept itself. For this reason, we can characterize the first group as material criticism and the second group as formal criticism.

6 Murat Sarıca, “Fransa’nın V’inci Cumhuriyet Anayasası”, *İstanbul Üniversitesi Hukuk Fakültesi Mecmuası*, Vol. 27(1-4), 1961, p. 62-95.

7 Duverger, “A New Political System Model: Semi-Presidential Government”, p. 166.

8 The key aspects of this discussion can be followed in this leading source: Elgie, “The Politics of Semi-Presidentialism”, p. 1-12.

Semi-presidential regimes have three characteristic elements.

- The president:
- i. is directly elected by universal suffrage;
 - ii. possesses quite considerable powers;
 - iii. shares the executive branch with a government.

1. Material Critiques

Seemingly, material criticism concentrates on two of the three elements in Duverger's definition. These are the shortcomings of the concept of "election by popular vote" and the ambiguity of "quite considerable powers".

a. The Shortcomings of "Universal Suffrage"

The first of the criticisms concerns the element of election.⁹ The connotation of the election criterion by universal suffrage is the direct election of the president by the people. However, in the examples of Finland and Ireland, where Duverger sees a semi-presidential system, elections are not "direct". At the time when Duverger put forward his argument, the president of Finland was elected indirectly, through the party blocs. Likewise, in Ireland, it is possible for political parties to agree on one person who can then take office without any opposition. Coming to office in these cases is sometimes not very different from the elections held by parliament.

Facing these critiques, Duverger argued that although there was no election by the people in the aforementioned cases, the election made by the notables was very similar to the two-stage election in the USA. According to him, the important point here is the possibility of manipulation or mobilization of the people by actors (especially in Latin America), whether inside or outside of politics, through media and other channels. In other words, what he means by election is the existence of a process that goes through the filter of the people, or at least interacts with them.¹⁰

b. Ambiguity: "Quite Considerable Powers"

Another disputable point in Duverger's definition is that it is not clear what is meant by the president having "quite considerable powers".¹¹ This ambiguity led to criticisms, and indeed, caused the concept to become relative.

All of the authors who review the said element according to their subjective criteria accept France, without exception, as semi-presidential. But different views appear with regard to other countries. These differences of opinion leave unanswered the question of which states in the world have semi-presidential systems – so much so

Criticisms of Duverger's definition are based on the shortcomings of the concept of "election by popular vote" and the ambiguity of "quite considerable powers".

9 See, Alfred Stepan and Cindy Skach, "Constitutional Frameworks and Democratic Consolidation: Parliamentarism versus Presidentialism", *World Politics*, Vol. 46, 1993, p. 5; Matthew Shugart and John M. Carey, *Presidents and Assemblies: Constitutional Design and Electoral Dynamics* (Cambridge University Press, 1992), p. 213.

10 Maurice Duverger, *Echec au roi* (Albin Michel, 1978), p. 68-86, as cited in Elgie, "The Politics of Semi-Presidentialism", p. 9.

11 Elgie, "The Politics of Semi-Presidentialism", p. 10.

that there is no consensus on the number of states with semi-presidential governments in the world today. While some authors count around thirty semi-presidential models, others claim that the number has reached fifty-five.¹²

On the other hand, the meaning of the “quite considerable powers” of the president, if those remain on paper, is another controversial issue. Methodologically, whether to look at what is written in the constitution or the constitutional reality, that is, political life, led to differences in approach. Indeed, heads of states who are powerful according to the text of the constitution but weak in practice (e.g., Iceland, Austria) or those who possess much more power in practice (e.g., France, Weimar) than what is prescribed in the constitution, provide substance to this claim. Moreover, this problem becomes more complicated when one bears in mind that there are cases in which presidential powers are strong both on paper and in practice (Finland) and vice versa (Ireland). Since it is not scientifically acceptable for a purely analytical category to be so relative, it is necessary to take these critiques into account.

2. Formal Critiques

Conceptual critiques are based on “terminology”. According to some authors who focus on the qualifier “semi” (the Latin for “half”), the characterization of the system as “semi-presidential” raises the question of what is the other half that the concept implicitly refers to. From this point of view, the possibility of using the adjective “semi-parliamentary” for this system has been raised.¹³

According to Duverger, giving weight to the presidency is a conscious choice. Because in this system, the centre of gravity in terms of relations between the parliament and the president is the president. This weight is related to sources of legitimacy. The only source of legitimacy in the parliamentary model is parliamentary elections. However, in this system, just as in presidential systems, the sources of legitimacy are twofold (election of the parliament and election of the president). Based on this similarity, Duverger argued that he avoided the expression “semi-parliamentarism”, which emphasizes the parliament.¹⁴

12 For a source claiming that there are more than fifty cases, see, Cindy Skach, “The Newest Separation of Powers”, *International Journal of Constitutional Law*, Vol. 5(1), 2007, p. 94. For a study in which specifically fifty-five cases were counted, see, Robert Elgie, “What Is Semi-Presidentialism and Where Is It Found”, in Robert Elgie and Sophia Moestrup (eds.), *Semi-Presidentialism outside Europe: A Comparative Study* (Routledge, 2007), p. 8

13 See, Juan J. Linz, “Presidential or Parliamentary Democracy: Does It Make a Difference?”, in Juan J. Linz and Arturo Valenzuela (eds.), *The Failure of Presidential Democracy. Comparative Perspectives* (Johns Hopkins University Press, 1994), p. 48.

14 Maurice Duverger, *Les Régimes semi-présidentiels* (Paris: Presses Universitaires de France, 1986), p. 8, as cited in Elgie, “The Politics of Semi-Presidentialism”, p. 5.

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Another criticism based on terminology is that the prefix “semi” implies being “located midway along some continuum running from presidential to parliamentary”.¹⁵ In a way, this questioning also triggered the debate about where the semi-presidential position stands in the spectrum of political systems, that is, whether it is a “mixed model” or an “independent” and “pure” model. According to this approach, a system that is somewhat parliamentary and somewhat presidential, that is, borrowing some features of the two classical models, is of mixed or hybrid nature. Therefore, it cannot be considered in the same category as pure systems. Moreover, the differences in practice among the states that are considered semi-presidential also prevent them from being gathered in a common cluster.

Duverger and his followers also opposed these criticisms and argued that it is necessary to get rid of the fetishism of dealing with political systems in a binary way, and that it is possible to consider systems with similar fundamental structures, in a separate category. According to Duverger, differences in implementation among the states within such a category also exist within the presidential and parliamentary categories. For example, when comparing the systems in Germany and Italy, both of which are considered parliamentary, many distinctions can be highlighted. However, when considering both as parliamentary systems, commonalities are taken into account, and not these distinctions: what is important is the features that distinguish them from other categories, and that are common among them.¹⁶

B. Syntheses

The aforementioned discussions are not complete, and it is not very likely that these will reach their conclusion due to the unique nature of social sciences. However, these polemics have led to certain consequences.

1. *Material Syntheses*

The material criticisms were based on the incompleteness and ambiguity of the elements that Duverger put forward. In this context, the question of whether the presidential election should be direct or indirect in semi-presidential regimes was easily overcome in the literature. According to the prevailing argument, what matters most is presidential legitimacy, and both types of elections should be accepted within the definition.¹⁷ Here, it can be said that an agreement was reached.

The prefix “semi” triggers the debate about where the semi-presidential position stands in the spectrum of political systems, that is, whether it is a “mixed model” or an “independent” and “pure” model.

¹⁵ Shugart and Carey, *Presidents and Assemblies: Constitutional Design and Electoral Dynamics*, p. 23.

¹⁶ Duverger, *Les Régimes semi-présidentiels*, p. 8, as cited in Elgie, “The Politics of Semi-Presidentialism”, p. 7.

¹⁷ Giovanni Sartori, *Comparative Constitutional Engineering: An Inquiry into Structures, Incentives and Outcomes* (Macmillan, 1997), p. 131.

However, there is no similar consensus regarding the concept of “quite considerable powers”. Considerable powers have been enumerated differently by authors, creating differences of opinion.

An example of those definitions that include this element is provided by O’Neil; in semi-presidential governments: (1) executive power is divided between a prime minister as head of government and a president as head of state, and (2) substantial executive power resides with the presidency.¹⁸

This definition excludes states (Austria, Ireland, and Iceland) where presidents are elected directly by popular vote yet do not possess strong powers, while it covers those (Albania, Czechoslovakia) where presidents are powerful yet elected indirectly.

Giovanni Sartori, too, took the Duverger definition as reference but replaced the criterion of “election by general vote” with (i) “being elected by a popular vote—either directly or indirectly—for a fixed term of office”, and also (ii) emphasized the necessity of pointing out the nature of the government in this system, as a dual structure which relies on the sharing of government between the president and the prime minister. According to Sartori, the “dual authority” which is unique to the semi-presidential government has three descriptive elements: (i) “The president is independent from parliament, but is not entitled to govern alone or directly and therefore his will must be conveyed and processed via his government.” (ii) “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.” (iii) “The dual authority structure of semi-presidentialism allows for different balances and also for shifting prevalence of power within the executive, under the strict condition that the ‘autonomy potential’ of each component unit of the executive does subsist.”¹⁹

Sartori’s definition, which requires that the president, who is elected by the people and has strong powers, should share the powers with the prime minister, who is also equipped with strong powers, considers Finland, France, and Sri Lanka in this semi-presidential category.

Linz, on the other hand, understands the semi-presidential model as a system in which the head of state is elected directly or indirectly by the people without being

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18 Patrick O’Neil, “Presidential Power in Post-Communist Europe: The Hungarian Case in Comparative Perspective”, *Journal of Communist Studies*, Vol. 9(3), 1993, p. 197.

19 Sartori, *Comparative Constitutional Engineering*, p. 130-131.

nominated by the parliament, and the prime minister is subject to a vote of confidence by the parliament.²⁰ This definition corresponds to the constitutional order in Finland, France, and Portugal.

The definitions provided so far show that both Duverger's definition and his list, which originally included Austria, Finland, France, Ireland, Iceland, Portugal, and Weimar, have appeared differently in the works of various authors.

But what definition should we rely on, and which states should we take as a reference? Indeed, if a certain pure model is to be mentioned, this model should not remain in the mist in comparative and analytical studies, and its feet should touch the ground, to say the least.

At this point, Elgie's definition, which is seemingly inspired by Linz's and focuses exclusively on this problem and looks for a solution, can help us. The definition that the author proposes in his qualified works that guide the subsequent literature is as follows:

*A semi-presidential regime may be defined as the situation where a popularly elected fixed-term president exists alongside a prime minister and cabinet who are responsible to parliament.*²¹

It should be noted that this synthesis, on one hand, refers to the public but does not reduce it to direct election in the narrow sense. In this respect, it also covers cases such as Finland or Ireland. On the other hand, the definition does not include any explanation regarding the powers of the president. By taking this element out of the picture, it makes the semi-presidential model a fully fledged objective category separate from the presidential and parliamentary regimes. Thus, the semi-presidential model is not limited to cases with very strong presidents (France, Russia), but extends to those with more limited (Finland, Poland, Portugal) or weak (Austria, Bulgaria, Ireland, and Iceland) heads of state.²²

This comprehensive yet, at the same time, consistent definition is worth noticing as it is scientifically functional.²³ In this research, therefore, it is taken as a major point of reference.

20 Linz, "Presidential or Parliamentary Democracy: Does It Make a Difference?", p. 48.

21 Elgie, "The Politics of Semi-Presidentialism", p. 13.

22 *Ibid.*

23 Indeed, this is the most accepted definition. See, Petra Schleiter and Edward Morgan-Jones, "Citizens, Presidents, and Assemblies: The Study of Semi-Presidentialism beyond Duverger and Linz", *British Journal of Political Science*, Vol. 39(4), 2009, p. 874.

What definition should we rely on, and which states should we take as a reference? Indeed, this model should not remain in the mist in comparative and analytical studies.

As for the criticisms against the element of “quite considerable powers”, it is true that this item is relative. In this respect, although removing it from the definition seems to make things easier, it is necessary to identify these powers and even make them measurable to understand different semi-presidential practices and make a comparison between them.

Various lists have been prepared for this purpose by authors and different criteria have been introduced.²⁴ It cannot be said that all of these lists of powers, some of which contain as many as thirty items, yielded healthy results. Although it is not possible to go into details here, it is safe to say that some lists stand out in the literature. The list prepared by Siaroff features (i) election by the people, (ii) simultaneous election with the legislature, as well as (iii) appointment to important posts, (iv) presiding over cabinet meetings, (v) veto laws, (vi) powers to dissolve the legislature, (vii) state of emergency, (viii) foreign policy, and (ix) powers related to the establishment processes of the government, as items that make the president powerful. Siaroff derived results by comparing different presidencies with the scores he gave from 1 to 10 based on these criteria.²⁵

In the lists that were drafted by Shugart and Carey, updated by Metcalf, and used by Tavits for different systems, powers that make a president strong were categorized as being or not being related to the legislative organ.²⁶ For the first case, powers in the form of (i) pocket veto, (ii) partial veto, (iii) decree-law, (iv) proposal of law, (v) budget, (vi) offering the law to a referendum, and (vii) initiating a judicial review. For the second case, powers such as (viii) formation of the cabinet, (ix) dissolution of the cabinet, (x) censure, and (xi) dissolution of the assembly were provided. The authors compared these powers by assigning scores to them between 0 and 4, based on their further elements. These scores are notable for producing some subcategories.

Throughout this paper, these scores will be considered appropriately.

2. Formal Syntheses

As for the formal discussions, one of the most striking syntheses in the debates in this field is that the concept of semi-presidential government is not a hybrid of “both this and that”, but creates a distinctive category of “neither this nor that”. This uniqueness puts this regime on par with other pure regimes.

24 See (in Turkish), Şule Özsoy Boyunsuz, *Başkanlı Parlamenter Sistem: Cumhurbaşkanının Halk Tarafında Seçildiği Başkanlı Hükümet Modeli ve Türkiye için Tavsiye Edilebilirliği* (Oniki Levha Yay., 2014).

25 Alan Siaroff, “Comparative Presidencies: The Inadequacy of the Presidential, Semi-Presidential and Parliamentary Distinction”, *European Journal of Political Research*, Vol. 42(3), 2003, p. 287-312.

26 Shugart and Carey, *Presidents and Assemblies: Constitutional Design and Electoral Dynamics*; Lee Kendall Metcalf, “Measuring Presidential Power”, *Comparative Political Studies*, Vol. 10, 2000, p. 660-685; Margit Tavits, *Presidents with Prime Ministers. Do Direct Elections Matter?* (Oxford: Oxford University Press, 2009).

The “quite considerable powers” debate is relative. Although removing it from the definition seems to make things easier, it is necessary to identify these powers and even make them measurable to understand different semi-presidential practices.

However, in this context, special attention should be paid to Arend Lijphart's approach. According to Lijphart, a semi-presidential government is not a synthesis of presidentialism and parliamentarism or a system that stands somewhere between these two. Moreover, its value is not that it brings a "balance" between the two pure systems. The point is that, depending on whether the president's party has a majority in the legislature or not, it can shift towards either parliamentary or presidential systems. In this respect, the hybridity is not static, but a dynamic one that tends to shift to one of the two systems depending on political developments. Therefore, if a distinguishing characteristic of the semi-presidential system is to be mentioned, it is these alternations between presidential and parliamentary systems.²⁷ Indeed, in the system in question, at a time when a parliamentarian-like operation prevails, if the conditions are ripe, the president may become stronger than in purely presidential systems, even to the degree of becoming "hyper-presidential".²⁸

In other words, the centre of gravity does not remain constant in this "two-wing" system in which the executive has two branches with double bases of legitimacy. Alternations in the centre of gravity according to political developments should be regarded as a unique feature of the system.

Although there is some truth in this original inference of Lijphart, it should also be kept in mind that it is not suitable for textual studies, and even when looking at the actual situation, one of the two wings may be advantaged from the very beginning. It is clear that systems in which this advantage is on the side of the president are semi-presidential. On the other hand, it is necessary to answer the question of whether countries where the president is elected by the people and enjoys strong legitimacy but does not act as expected, and even remains at a symbolic level, can still be considered semi-presidential or not.

Based on Duverger's centre of gravity criterion, some authors did not consider such systems semi-presidential, and some even described them as "semi-parliamentary".²⁹ However, some others who rely on the same criterion preferred to divide the semi-presidential types into subcategories without resorting to the concept of "semi". In this context, terms such as "divided executive", "bipolar executive", "parliamentary presidential republic", "parliamentary-like government", and "unipolar

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27 Arend Lijphart, "Introduction", in Arend Lijphart (ed.), *Parliamentary versus Presidential Government* (Oxford University Press, 1992), p. 2.

28 Arend Lijphart, "Constitutional Design for Divided Societies", *Journal of Democracy*, Vol. 15(2), 2004, p. 96-109.

29 See, Steffen Ganghof, *Beyond Presidentialism and Parliamentarism Democratic Design and the Separation of Powers* (Oxford University Press, 2021), p. 36.

two-headed executive” were offered.³⁰ In fact, these include the “premier-presidential government” in which the centre of gravity is the president (the government is responsible before both the legislature and the head of state and can be overthrown by both) and the “president-parliamentary government” where the centre of gravity is the parliament. The distinction between these categories is common, especially in English and Turkish literature.³¹

We can see each of these distinctions as a synthesis. But not all of these syntheses fall within our overarching definition, provided in the previous title. However, what can be drawn from this discussion is that there may be subcategories of semi-presidential governments.

II. CASES OF SEMI-PRESIDENTIAL GOVERNMENTS

According to the wider definition that I recognized, today there are more than fifty states around the world that are governed by semi-presidential models. The vast majority of those assumed this model in the last quarter of the twentieth century. Nevertheless, a virtue distinct from the context should not be attributed to such a high number, as two important factors are increasing it:

First, the states that gained their independence from colonial powers, such as France (Algeria, Burkina Faso, Chad, Gabon, Haiti, Mauritania, Cameroon, Mali, Central African Republic, Rwanda, Senegal, Mozambique, Niger, and Tunisia) and Portugal (Angola, East Timor, Gine-Bissau, Sao Tome and Principe, and Cabo Verde), were influenced by their respective former colonizers.³²

The second issue owes much to the fact that many states became independent after the dissolution of the Eastern Bloc (Azerbaijan, Armenia, Belarus, Croatia, Georgia, Kazakhstan, Kyrgyzstan, Lithuania, Macedonia, Mongolia, Polonia, Romania, Russia, Slovakia, Tajikistan, Uzbekistan, and Ukraine), and consciously opted for this model in order to speed up their transition to the liberal order and manage this transition effectively, in a centralized fashion. Leaving aside the European pioneers and those coming from the abovementioned roots, other cases are limited to Austria, Bulgaria, Ireland, Iceland, France, Portugal, and Slovenia in Europe, and South Korea, Peru, Sri Lanka, Taiwan, and Yemen elsewhere.

30 For these designations, see, Nur Uluşahin, *Saf Hükümet Sistemleri Karşısında İki Başlı Yürütme Yapılanması* (Yetkin, 2007), p. 56.

31 For a detailed analysis, see, Robert Elgie, “An Intellectual History of the Concepts of Premier-Presidentialism and President-Parliamentarism”, *Political Studies Review*, Vol. 18(1), 2019, p. 1-18.

32 Namibia, the former German colony, and Tanzania and Singapore, former British colonies, had also chosen this structure after independence.

There are more than fifty states around the world that are governed by semi-presidential models. The vast majority of those assumed this model in the last quarter of the twentieth century.

The common denominator of those countries is, generally, the fact that their multi-party democracies were developed only with interruptions, making their democracies unsettled. Research on this shows empirically that in those countries in which democracy is not yet settled, the president's having many powers does not contribute to the development of democracy.³³

III. SUBCATEGORIES

As can be understood from what has been provided so far, there are many definitions in the semi-presidential literature and many categorizations depending on these definitions. So much so that even France, which is considered the prototype of this model, can be seen within nineteen different categories. Some authors who see this diversity as problematic, argue that no such independent government systems exist, therefore all systems with cabinets that are responsible to parliament should be considered parliamentary and the nuances should be understood under this roof. Others argue that the semi-presidential system of government should be determined by the powers of the president. In this context, the president has effective powers such as appointing and removing the prime minister and other ministers, making rules, and dissolving the parliament. Furthermore, those authors attribute a decisive meaning to governments being subjected to the trust of both the president and the parliament. Systems in which presidents are elected by the people but do not have such powers are excluded from the scope of semi-presidential models.³⁴

According to the previous syntheses, we consider all systems in which the head of state is elected by the people, but where there is a duality in the executive, as semi-presidential. Therefore, the fact that heads of state have more or fewer powers may be related to what kind of semi-presidential model is adopted, not whether these are semi-presidential or not. Systems in which the head of state has "considerable powers" should be considered semi-presidential in the narrow sense, as they fit Duverger's definition perfectly. We can call this subcategory "real semi-presidential systems". On the other hand, systems with presidents who do not have "considerable powers", that is, with symbolic powers, do not fit the Duvergerian definition, but they do fit our broad definition. These examples,

In this study, we consider all systems in which the head of state is elected by the people, but where there is a duality in the executive, as semi-presidential.

33 See, Sophia Moestrup, "Semi-Presidentialism in Young Democracies: Help or Hindrance?", in Elgie and Moestrup (eds.), *Semi-Presidentialism outside Europe: A Comparative Study* (Routledge, 2007), p. 30; Gianfranco Pasquino, "The Advantages and Disadvantages of Semi-Presidentialism. A West European Perspective", in Elgie and Moestrup (eds.), *Semi-Presidentialism outside Europe: A Comparative Study* (Routledge, 2007), p. 14.

34 Siaroff, "Comparative Presidencies: The Inadequacy of the Presidential, Semi-Presidential and Parliamentary Distinction", p. 287.

which are accepted as semi-presidential in a broad sense, can be called “unreal semi-presidential systems”.³⁵

A. Unreal Semi-Presidential Systems

An unreal semi-presidential system shows the characteristics of semi-presidential models through (i) election of the president directly by the people or in a similar way, and (ii) the establishment of the other wing of the executive under the characteristics of a parliamentary system. However, in these cases, the powers of the head of state are so great that (iii) there is an extraordinary diversion from the prototypes of the semi-presidential system based on the two-winged executive balance.

This diversion from the centre of the semi-presidential system can go in two directions: towards parliamentarism or toward proper presidential systems.

1. Parliamentary Diversions (*Symbolic President*)

In countries where semi-presidential models divert towards parliamentarism, the fundamental qualities of parliamentary models do exist but with a president who has symbolic powers and is elected directly by the people. In these cases, seemingly, the fact that the president is elected by the people does not make an impact on the fundamental qualities of the parliamentary system. Therefore, some authors place such countries under the category of parliamentary systems.

Particularly, Austria, Ireland, Iceland, Portugal, and Slovenia are regarded as such.³⁶ Among these, Portugal, thanks to an amendment made to its constitution of 1976 six years after its inauguration, made a reform that empowered the president and came close to having a real presidential system.³⁷

Others continued to maintain their current features. The first striking feature of the aforementioned countries is that they are all members of the Council of Europe and are considered in the “free” category.

Systems in which the head of state has “considerable powers” should be considered as “real semi-presidential systems”. Systems with presidents who do not have “considerable powers” can be called “unreal semi-presidential systems”

35 Although Elgie makes this distinction as “*semi-presidential regimes with ceremonial presidents*” and “*highly presidentialised semi-presidential regimes*”, and for the functional semi-presidential governments as “*semi-presidential regimes with a balance of presidential and prime ministerial powers*”, such designations are not phonetically appropriate. Alternatively, a distinction can be made between “semi-presidential government in the wider sense” and “semi-presidential government in the narrow sense”; however, since “wide” theoretically covers “narrow” as well, a logical question might remain. For Elgie’s distinction, see, Robert Elgie, “Variations on a Theme”, *Journal of Democracy*, Vol. 16(3), 2005, p. 98-112. For the author’s abandonment of this distinction, see, Elgie, “An Intellectual History of the Concepts of Premier-Presidentialism and President-Parliamentarism”.

36 Elgie, “Variations on a Theme”, p. 105. Besides these countries, it is possible to put Slovakia and Croatia in this category since the total score of presidential powers there are not higher than is true for Iceland.

37 From this perspective, Portugal went from being a “*presidential parliamentary*” to being a “*presidency with prime minister*”, according to the Shugart-Carey distinction. The practice, too, is changeable according to the legislative majority. See, Octavio Amorim Neto and Marina Costa Lobo, “Portugal’s Semi-Presidentialism (Re)Considered: An Assessment of the President’s Role in the Policy Process, 1976-2006”, in S. Royo (ed.), *Portugal in the Twenty-First Century: Politics, Society and Economics* (Lexington Books, 2012), p. 49-69.

Another common feature of these countries is that although there is an elected head of state in the country, the system functions almost like a parliamentary model. The head of state is not a decision-maker and executive in principle, but rather symbolic and uniting. The main actor who comes to the fore in the country's administration is the prime minister, who is responsible for the day-to-day executive affairs. Since the head of state elected by the people does not have high powers, this individual does not appear as a rival to the prime minister.

Here, the following question may rightfully come to mind: Why does the power of the head of state elected by the people remain at a symbolic level? The answer lies primarily in historical background. In Western European cases, the reaction towards the previous administrations played a role in the way the head of state is elected, that is by the people, despite having symbolic powers. For example, although the parliamentary tradition is maintained in Ireland, which gained independence from Britain, the cradle of parliamentarism, the direct election of the head of state by the people was preferred as a result of the reaction to the monarchy. Iceland's story is similar. There, after the end of the autonomy in which the Danish King was recognized as the president, a strong presidency had not been established. Together with the mistrust of political parties during the years of the Second World War and the demands of the people, the idea of keeping the powers of the president symbolic resulted in the adoption of the president's election by popular vote.³⁸

The Austrian case is the product of unique historical conditions, but still contains some reaction to the past. So much so that, when the 1920 Constitution was proclaimed, the memory of the Habsburg Dynasty, which dissolved the parliament in 1914 and established an authoritarian rule, was fresh in the minds of the people. For this reason, a symbolic president was provided against the idea of a head of state who would tend towards tyranny in the constitution-making process, in which the social democrats were decisive. Especially right-wing parties showed reaction to this design, and the 1920s was spent trying to strengthen the executive against the legislature and the central power against the states. Upon the 1929 economic crisis and government instability, it was envisaged that the president should be elected by the people and equipped with new powers (appointing and dismissing the government, dissolving the parliament). Indeed, after this shift and during WWII, legitimate and strong presidents used these powers appropriately. The post-War period, however, brought caution against such a concentration of power. The idea of a symbolic president returned, yet the principle of popular election continued to exist.³⁹

Why does the power of the head of state elected by the people remain at a symbolic level? The answer lies primarily in the historical background.

38 Gunnar Helgi Kristinnsson, "Iceland", in Robert Elgie (ed.), *Semi-Presidentialism in Europe* (Oxford University Press, 2004), p. 86-104.

39 Wolfgang C. Müller, "Austria", in Robert Elgie (ed.), *Semi-Presidentialism in Europe* (Oxford University Press, 2004), p. 22-48.

Focusing on this subcategory, Elgie is of the view that it cannot be said beforehand that countries attached to it are contributing to democracy. Indeed, for example in Ireland, the transition to this model happened some fifteen years later, after the independence and the establishment of a consolidated democracy. Likewise, in Portugal in 1974, when there was a president with strong executive powers, it was after the establishment of democracy that the powers became symbolic.⁴⁰

However, neither it can be said that the model in question contributes to authoritarianism. The fact that the president's powers are limited on paper, no matter how hard he or she tries, leads figures who want to dominate the system and who have authoritarian tendencies to the prime minister's seat rather than this office. But despite having fewer powers, a second wing that acts in a unifying way and brings balance towards such a figure may be compatible with the aims of constitutionalism. Therefore, we can say that this form of semi-presidential system produces similar results to the parliamentary regime and is less vulnerable to the problems outlined in the next chapter, in terms of compatibility with democratic administrations.

2. Presidential Diversions (Monocratic President)

Presidential diversion is an expression applied to semi-presidential systems in which the powers are concentrated extravagantly in the hands of the president. This concentration of power is so strong that such models are referred to by some authors as "hyper-presidency" or "super-presidency".⁴¹ "Considerable powers" of presidents in this category are expanded to such a degree as to surpass the threshold of "considerable" in that sense. In fact, the legal and de-facto powers of these presidents are so much higher than those in other semi-presidential models that a comparison would be meaningless.⁴² That being the case, it comes as no surprise that these states are not considered completely free and democratic.

The most important factor for this diversion is that the establishment of the government is subordinate not only to the legislature, but also to the head of state, and the government is also responsible before the president. However, this should not always be counted as the sole decisive factor. Because, as seen in the examples of Azerbaijan and Russia, even in the absence of such a situation, presidential diversion may occur.

⁴⁰ Elgie, "Variations on a Theme", p. 105-106.

⁴¹ For example, Timothy J. Colton, "Superpresidentialism and Russia's Backward State", *Post-Soviet Affairs*, Vol. 11(2), 1995, p. 144-148.

⁴² Elgun A. Taghiyev, "Measuring Presidential Power in Post-Soviet Countries", *CEU Political Science Journal*, Vol. 3, 2006, p. 11-21; Oleg Zaznaev, "Measuring Presidential Power in Post-Communist Countries: Rectification of Mistakes", *Mediterranean Journal of Social Sciences*, Vol. 6(1), 2015.

Presidential diversion is an expression applied to semi-presidential systems in which the powers are concentrated extravagantly in the hands of the president. Such models are referred to by some authors as "hyper-presidency" or "super-presidency".

The best-known case of these states is Russia. Vladimir Putin took office in 1999 and ever since then has been ruling the country which lacks the tradition of multi-party democracy.⁴³ Likewise, we have been witnessing or witnessed the long-term presidencies of Ilham Aliyev in Azerbaijan (19 years), Nursultan Nazarbayev in Kazakhstan (29 years), Islam Kerimov in Uzbekistan (26 years), and Imamali Rahman in Tajikistan (20 years), all of which are monocratic and without election safety. The lack of democratic tendencies is also clear considering the fact that all these names were figures of the Stalinist regime in the Soviet Union.

These countries manifest all the characteristic problems embedded in presidential systems. In this sense, it can be argued that these five risks that are specific to presidential systems are also applicable to the countries in this category:⁴⁴

1. Competition between the executive and the legislative organs becomes fierce.
2. Due to the fixed terms of office, the system becomes more rigid in comparison with parliamentary systems.
3. It may cause a zero-sum game in which the winner takes all and the loser is left with nothing.
4. The mechanism of presidential policies encourages presidents to act without tolerance toward political opposition.
5. The system encourages populist candidates.

Because of these setbacks, the constitutional order of these countries shifted toward autocracy. Notable exceptions include South Korea and Peru. In these countries, although the powers of the president used to be excessive, political alternation continued. However, this result was achieved not because of the system, but despite the system and due to the unique conditions of these countries.

B. Real Semi-Presidential System

The real semi-presidential category consists of countries that fit the classical definition of power distribution, as can be understood from the constitution. In this respect, the head of state, who is elected by the people and constitutes one of the two wings of the executive, is equipped with “considerable powers”. These powers are neither so little as to be “symbolic” nor “excessive” enough to reach a degree that can no longer be called important.

In the real semi-presidential system, the head of state, who is elected by the people and constitutes one of the two wings of the executive, is equipped with “considerable powers”.

⁴³ Even though the centre of gravity in the system shifts between the presidency and the prime minister arbitrarily, the actor remains the same.

⁴⁴ Scott Mainwaring and Matthew S. Shugart, “Juan Linz, Presidentialism, and Democracy: A Critical Appraisal”, *Comparative Politics*, Vol. 29, 1997, p. 450-451.

Even though this is the case, power relations between the wings of the executive are not static, absolute, and universal in these systems. Depending on the political conjuncture, sometimes the head of state and sometimes the prime minister comes to the fore. This category can also be divided into subcategories according to which one of these wings prevails.

1. Cases of Prime Minister Dominance

In countries where the division of power between the head of state and the prime minister is relatively balanced, the system manages to survive more easily. However, the common situation in these cases is that the decision-maker in the executive is the prime minister. Undoubtedly, this prime minister-dominated order is not due to the symbolic position of the president. Heads of state under this category are not entirely passive while being active in a field or two, especially in defence and foreign policy. However, such an actor does not push the limits too far. While the system leaves the day-to-day politics to the prime minister, the head of state seems to be provided with more authority in macro policies. This is also the case in the former Eastern Bloc countries of Bulgaria, Croatia, Lithuania, and Poland, as well as in Finland, which is geographically close to them. Interestingly, most of the powers vested in heads of state in these countries are no more than those in the parliamentary system. Furthermore, a comparison based on previously mentioned lists of presidential powers interestingly shows that some of these presidents have similar or in some cases, fewer powers – regardless of practice, based on paper – than those who are regarded as symbolic.⁴⁵

In the real semi-presidential systems, power relations between the wings of the executive are not static, absolute, and universal. Sometimes the head of state and sometimes the prime minister comes to the fore.

Country	Average score of the powers of the president
<i>Croatia</i>	0.33
Iceland	0.33
Portugal	0.33
<i>Lithuania</i>	0.32
<i>Poland</i>	0.29
Ireland	0.18
<i>Finland</i>	0.17
Slovakia	0.15
Bulgaria	0.14
Austria	0.13

⁴⁵ For the full list, see, Robert Elgie, "The President of Ireland in Comparative Perspective", *Irish Political Studies*, Vol. 27(4), 2012, p. 507-510.

What matters here is that even if presidents have relatively few powers, these are clearly understood, and presidents remain in their own field without violating the prime ministerial space.⁴⁶

2. Cases of President Dominance

The semi-presidential model in which the president is at the frontline can be seen in France, where the system emerged. It is even interesting that among the countries that have crossed a certain threshold in terms of democracy, there is no other case where presidents appear at the frontlines. The 1958 Constitution, prepared by General De Gaulle to create a strong executive, ensured the democratic survival of the semi-presidential practice in which the head of state stood out for reasons specific to France.

However, it should be noted that this practice did not remain static but differentiated under the conditions of the “divided government”, which will be discussed shortly. In such cases, the system makes “cohabitation” possible, especially when the prime minister comes to the fore while the president stays in the back. This has been proven not only by France, which is considered “free” and “democratic”, but also by countries such as Lithuania, Poland, and Romania, which are referred to as not free but as electoral democracies. However, in countries without the conditions for maintaining such cohabitation (e.g., Ukraine, Niger, and Sri Lanka), the system has been interrupted by coups or revolutions. Historically, it can be said that a similar problem was experienced in the Weimar Republic.

Thus, in real semi-presidential systems, the issue is tied to the possibility of “divided government”.

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IV. THE DIVIDED GOVERNMENT PROBLEM

A divided government, in its most general sense, is the situation where the executive lacks the support of the majority of at least one wing of the legislature.⁴⁷ This deprivation often arises when control of both the legislative and executive branches is not in the same political party (arithmetically divided government). However, it should be kept in mind that a political party does not bring absolute homogeneity. Sometimes political actors who are members of the same political party may develop different attitudes about a specific issue. In this respect, regardless of the parties, the conflict of will between the

⁴⁶ In some of these cases, such as Bulgaria, presidents tend to use more powers than are prescribed in the constitution. For such cases, see, Özsoy Boyunsuz, “The AKP’s Proposal for a ‘Turkish type of Presidentialism’ in Comparative Context”, p. 125, 225, and 249.

⁴⁷ Robert Elgie, “Preface”, in R. Elgie (ed.), *Divided Government in Comparative Perspective* (Oxford, 2002), p. v.

legislature and the executive, or situations where they cannot determine a common policy, can also create a divided government (behaviourally divided government).⁴⁸

The concept is derived as a rule in the USA, that is, in the context of the presidential system. The peculiarities of this system, caused by the strict separation of powers, make it easier to identify the division. However, divided administration can also be seen in parliamentary or semi-presidential systems. From the point of view of our subject matter, we can say that the emergence of divided administration in semi-presidential systems is highly possible. The reason for this is that in these systems, two different political actors are coming from two different sources in the executive as well as the legislature. This situation creates at least four different scenarios in government, three of which result in division.

A. Unified Government

Unified government or unified majority government in semi-presidential systems refers to cases where no division of government exists. In such a case, the majority of the presidency, prime minister, and legislature come from the same political party as a rule, and there is no behavioural conflict among these actors. Nor does a problem of government stability arise where there is some kind of “consolidated majority”.⁴⁹ In a scenario like this one, the point of discussion is whether the power becomes absolute, and the government becomes extremely autocratic. In this context, it is necessary to focus on the problems of the presidential regime, not problems specific to the semi-presidential system.

B. Divided Government Caused by Bicameralism

Bicameralism, that is, the bicameral system in the legislative power, is found in a significant number of countries and all different government systems. Second assemblies can sometimes cause a divided administration either in federalism, created for the necessity of representing federated states (e.g., Germany); or as an extension of the historical elitist tradition (e.g., the UK); and to provide check and balance with more qualified law-making (e.g., France).

For example, even in cases where the presidency, the prime minister’s office, and the majority of the first house belong to a certain political party, the majority of the second house may belong to another. This possibility may also exist in administrations

The concept of the divided government is derived in the USA, in the context of the presidential system. However, it can also be seen in parliamentary or semi-presidential systems.

⁴⁸ Robert Elgie, “What Is Divided Government?”, in Robert Elgie (ed.), *Divided Government in Comparative Perspective* (Oxford University Press, 2001), p. 7.

⁴⁹ Cindy Skach, “The Newest Separation of Powers”, p. 101.

that are divided due to a coalition or a minority government, which will be discussed shortly. However, generally, such divisions don't have a big impact on government stability: if some exceptions (e.g., parliamentary Japan) are excluded, in models where cabinets are formed based on a vote of confidence, this trust is received from the first houses, and initiatives such as a censure motion are also carried out there.⁵⁰ Therefore, the effects of divisions arising from the second houses are often behavioural.

C. Divided Government Caused by Coalitions

Other than presidential systems, the executive branch is usually formed by coalitions.⁵¹ In fact, it can be argued that, for Europe, the rule is the coalition while its non-existence is an exception.⁵²

Coalitions become relevant when a single party on its own does not have the majority in the legislature to provide the vote of confidence to the government. Political parties in the assembly cooperate and install governments, as a result of the negotiations held for that end. The prime minister, usually, is a member of the party that has received the largest share of the votes. Other seats in the cabinet are shared by parties that form the coalition.

If the prime minister of the coalition and the president come from the same party, then the government is to be considered a “*unified government*”. Otherwise, the government is clearly divided (divided majority) and the possibility of conflicts increases.⁵³

D. Divided Government Caused by Minority Government

Another type of divided government happens when the government is ruled by a minority. In parliamentary systems, minority governments are those formed by a single party or a coalition of parties, members of which fail to have a majority in the legislature.

In such cases, usually, those forming the majority in the parliament vote for confidence not because they wish to but because they are required to do so. It is quite easy to unseat the government when it enjoys only the support of the legislature and

50 For the Japanese exception, see, Michael F. Thies and Yuki Yanai, “Bicameralism vs. Parliamentarism: Lessons from Japan’s Twisted Diet”, *Japanese Journal of Electoral Studies*, Vol. 30(2), 2014, p. 60-74

51 In fact, and contrary to the common belief, in presidential systems also, there are coalitions built under “alliances”, that is, built before the presidential or legislative elections, in accordance with specific conditions of the system. For instance, a study that focused on coalitions in political regimes found that the rate of coalitions built to win parliamentary majority in presidential systems was 43.2%, between the years 1946 and 1999. For other such data, see, José Antonio Cheibub, Adam Przeworski and Sebastian M. Saiegh, “Government Coalitions and Legislative Success under Presidentialism and Parliamentarism”, *British Journal of Political Science*, Vol. 34(4), 2004, p. 565-587.

52 George Thomas Kurian et al. (eds.), *The Encyclopedia of Political Science* (CQ Press, 2011), p. 258.

53 Skach, “The Newest Separation of Powers”.

does not possess control over it. Therefore, from a point of government stability, the “*minority government*” is the most precarious type of administration in parliamentary systems. In semi-presidential systems, this type of government converges with the most precarious “*divided government*”, and thus the risk of “*political chaos*” doubles.⁵⁴

In other words, the possibility and intensity of an institutional-political conflict, which increases as the scale moves from a unified government to a divided government, tends to reach its peak in the division originating from the minority government.⁵⁵

Although the existence of – difficult to handle – minority governments can be seen as an advantage in terms of increased balance and supervision in political climates where democratic maturity exists, it may contain practices that may result in the parliament being under the dominance of the president, especially in countries that need rapid economic development.

The antidote to this risk is a healthy “cohabitation”.

V. COHABITATION

Originally meaning “living together”, cohabitation is the manifestation of the concept of divided government in semi-presidential systems. The concept implies the simultaneous administration of the president, who is elected by a certain majority of the people, and the prime minister, who benefits from the support of a parliamentary majority that is different from or even completely hostile to him or her, due to the peculiar distribution of power and the functions of political institutions in the semi-presidential system.⁵⁶ In this respect, this is the semi-presidential equivalent of a divided government, reflecting a potential institutional-political conflict arising from the conflicting agendas of opposing parties that separately control the offices of the president and the prime minister.

Here, unlike the presidential system, the division is experienced not only between the legislature and the executive but also within the executive itself.

The concept has been widely applied since the 1980s when the centre-right won the legislative majority in a parliamentary election held in France while President François Mitterrand of the Socialist Party was still in office.

Originally meaning “living together”, cohabitation is the manifestation of the concept of divided government in semi-presidential systems.

54 Cindy Skach, *Borrowing Constitutional Designs: Constitutional Law in Weimar Germany and the French Fifth Republic* (Princeton University Press, 2005), p. 17-18; Skach, “The Newest Separation of Powers”, p. 103.

55 Lydia M. Beuman, “President-Prime Minister Relations and Democratic Stability One Decade of Semi-Presidentialism in Post-Conflict Timor-Leste”, *Taiwan Journal of Democracy*, Vol. 12(2), 2016, p. 89.

56 Pasquino, “The Advantages and Disadvantages of Semi-Presidentialism. A West European Perspective”, p. 25.

In this context, the literature, which first focused on the experiences in France, has been deepened by comparative studies over time and some findings have been reached. Accordingly, in semi-presidential systems, the conditions that reveal cohabitation are (i) the presence of more than one popular figure in the political arena at the same time and/or the high level of polarization against the prominent figure as a factor that feeds this situation; (ii) the possibility of unforeseen sudden developments (e.g., economic crisis, terrorist attack, etc.) producing such a result after the voters made their choice in a certain direction; and (iii) especially since the 1980s (and at least in France) voters making their preferences for political parties based on their convictions rather than their traditional or ideological loyalties. It can be thought that the dissolution of the climate of the Cold War and the rise of individualism are also factors in this.⁵⁷ Furthermore, empirical data indicate that “cohabitation” more frequently occurs in (iv) semi-presidential models where the prime minister is prominent; (v) in situations where elections take place in the middle of the term of one of the two offices rather than in cases where they are held at the same time; and (vi) in situations where presidents turned out to be weak after presidential elections.⁵⁸

In terms of intensified conflicts, especially, (i) constitutional issues related to the influence and jurisdiction of political actors and their boundaries, as well as (ii) reform and policy agendas are on top of the list. In addition to this, (iii) the use of the power of appointment and (iv) political scandals related to corruption and illegal activities also constitute important topics of conflict. These are followed by personal tensions and other forms of conflict.⁵⁹

A. Reconciliatory Cohabitation

Conflict is inherent in politics. Tensions that cohabitation can create in conditions where the powers of the head of state are limited and the prime minister is at the forefront are not significant. Indeed, the head of state having symbolic or relatively fewer powers reduces the possibility of conflict. On the other hand, if the president possesses excessive authority, he or she becomes too strong to the extent of dominating the entire system, even preventing an alternative majority from emerging in the parliament through abuse of power or other means. In such cases, tensions that are specific to the presidential system or “delegative democracy” arise.

The concept has been widely applied since the 1980s when the centre-right won the legislative majority in a parliamentary election, while President François Mitterrand of the Socialist Party was still in office.

57 Robert Elgie, “Cohabitation: Divided Government French-Style”, in Robert Elgie (ed.), *Divided Government in Comparative Perspective* (Oxford University Press, 2001), p. 116.

58 Robert Elgie and Iain McMenamin, “Explaining the Onset of Cohabitation under Semi-Presidentialism”, *Political Studies*, Vol. 59(3), 2011, p. 616.

59 Thomas Sedelius and Olga Mashtaler, “Two Decades of Semi-presidentialism: Issues of Intra-executive Conflict in Central and Eastern Europe 1991–2011”, *East European Politics*, Vol. 29(2), p. 109–134. This research focused on Eastern European models of semi-presidential government.

The problem is, then, the divided government scenarios that can arise in systems where the president stands at the centre. Since the government is unified under these models, powers of the president that are not excessive do not cause trouble in democratic systems. However, the reactions of the actors would be of great importance when faced with an alternative legislative majority.

In France, this was experienced when the centre of gravity shifted from the president to the prime minister.⁶⁰ Undoubtedly, such a change in balance did not happen on its own, and both constitutional and political elements played a decisive role.⁶¹

Constitutionally, the president's powers under the constitution prevent him from insisting on certain policies. For example, the president has the authority to preside over the council of ministers and set its agenda. In this respect, the president may not include or postpone draft laws to prevent such drafts from being approved. However, it is possible for a prime minister to insist on adopting the draft in question and make it happen through the deputies of his or her party, which has the majority in the parliament. Moreover, the prime minister is provided with the authority to determine the order of discussion of laws, to request collective voting, to speed up the negotiation processes, to use the guillotine, etc. Considering the authorities that have been granted, it is clear that the prime minister will prevail in such conflicts. The same is true for the regulatory actions of the executive. The fact that the president may avoid signing regulatory acts seems to strengthen his or her position; nevertheless, this can be overcome through laws enacted by the parliamentary majority, upon proposals made by the deputies. Therefore, the power of the president in this sense is, at most, to delay.

Again, the president may send a draft law back to prevent its adoption. However, this is not the "qualified veto" power that the U.S. presidents enjoy. If the parliamentary majority that is attached to the prime minister insists, it is still the prime minister who has the odds in his or her favour. Finally, although appealing against a law before the constitutional court is a significant weapon, it is clear that the judiciary is to decide the outcome of this legal remedy.

All of these constitutional rules discourage the president, whose wishes ultimately will not be met to a large extent. Moreover, in this context, non-legal, political factors also

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60 Robert Elgie, *Political Leadership in Liberal Democracies* (Macmillan Press, 1995), p. 75.

61 For all definitions related to France, see, Sebastien G. Lazardoux, *Cohabitation and Conflicting Politics in French Policymaking* (Palgrave Macmillan, 2015); Elgie, "Cohabitation: Divided Government French-Style", p. 106-126; Malgorzata Madej, "Cohabitation: The Parliamentary Aspect of the French Semi-Presidential System", *Polish Political Science Yearbook*, Vol. 37, 2008, p. 184-207. In Turkish, see, Ercan Eyüpoğlu, "Fransa: Parlamenter Bir VI. Cumhuriyet'e Doğru", in İhsan Kamalak (ed.), *(Yarı) Başkanlık Sistemi ve Türkiye: İlkeler, Deneyimler ve Karşılaştırmalı Analiz* (Kalkedon Yay., 2014), p. 111-221.

come into play. Presidents, in a conflict where they have no chance of final success, have to take into account that they cannot rely on the support of the parliamentary majority and should avoid becoming a “spoiler”. Moreover, when factors such as the limited tenure of the president, the rule prohibiting re-election, the low standing of his party in the opinion polls, etc., are added, the cohabitation may well become “softened”.

Certainly, cohesion does not materialize with the complete retreat of the president. The experiences that presidents have in matters such as foreign policy and national security – especially if the president has been re-elected – cause them to use their constitutional powers in these fields. Since these can be regarded as matters that go beyond party lines compared to matters of domestic policies, the cabinet too, in most cases, does not put up much resistance. This was seen in France when Chirac did not insist against the interference of the socialist President Mitterrand in the appointment of ministers of foreign affairs and defence.

What makes French cohabitation possible can be summarized by the fact that presidential powers recognized by the constitution for unified governments fade away in the case of a divided government, but not to the extent of a complete meltdown. Also, the fact that actors in the system have not become usurpers even though they push constitutional limits, helps to overcome this risk of the semi-presidential government.⁶²

B. Conflicting Cohabitation

Just as semi-presidentialism includes cohabitation, cohabitation is not without tensions. There is a close relationship between the concepts of tension and conflict. Of course, cohabitation is not the only source of conflict. Conflicts within the executive may very well occur in times of “*unified government*”. But research data shows us that the possibility of a conflict almost doubles in times of cohabitation.⁶³ Likewise, according to another fact reached by research, as the presidential powers in semi-presidential models increase so does the possibility of conflicting cohabitation increase.⁶⁴ Here, the unsettled character of the culture and its experience of democracy is also a factor. As such, the severity of conflicts is much higher in the young “*democracies*” of Eastern Europe and Africa.

In these countries, parallel to the increase in the powers of the president, this is experienced even when the president and the legislative majority come from the same

As the presidential powers in semi-presidential models increase so does the possibility of conflicting cohabitation increase.

62 See, Sedelius and Mashtaler, “Two decades of Semi-presidentialism: Issues of Intra-executive Conflict in Central and Eastern Europe 1991–2011”, p. 114.

63 *Ibid.*; Elgie and McMenamin, “Explaining the Onset of Cohabitation under Semi-Presidentialism”, p. 622-631.

64 Thomas Sedelius and Joakim Ekman, “Intra-executive Conflict and Cabinet Instability: Effects of Semi-presidentialism in Central and Eastern Europe”, *Government and Opposition*, Vol. 45(4), 2010, p. 505-530.

party. The president's role may be used for his or her own purposes, rather than for ideological ends. Experience shows that in unsettled democracies, presidents, often supported by the wording of the constitution, see themselves as supra-partisan, the only representative of the whole nation, and exercise their numerous powers accordingly. They tend to perceive opposing voices as "harmful to national interests" or even as "divisive". On the other hand, as politics becomes personal, the personal ambitions of influential and authoritative political actors and their dislike for each other can increase the tension.

An example of this is the tense relations between President Lech Kaczyński and Prime Minister Donald Tusk in Poland between 2008 and 2010. The influence of the head of state on foreign policy in this country had created significant conflict. The ratification of the Treaty of Lisbon, the Russo-Georgian war, Poland's relations with Germany, the USA, and Russia, etc. were all important foreign policy issues that caused constant friction between the two. The domestic manifestation of this tension in foreign policy was the excessive use of veto power. This tension severely damaged the integrity of the state administration and bureaucracy, and the feeling of trust. In one of many incidents, the tension between the two wings of the executive over the representation of Poland in the European Union summit in 2008 reached such a level that Tusk refused the president's request to use the government plane to attend the summit in Brussels. Again, even after the tragic accident in 2010 where Kaczyński's plane crashed and ninety-five people including the president were killed, the level of tension continued to be felt, and two separate funerals were held in the country.⁶⁵

Constitutional displays of this tension were evident in the appointment of ministries. For example, again in Poland, we see that some appointments created tension between then-President Walesa and the prime ministers of his day. According to Walesa, the powers granted to him by the constitution on national defence as well as internal and foreign affairs made these ministries "presidential". Although this argument was tentatively accepted, both this acceptance and the reactions to it put pressure on the constitutional order. The tension did not remain temporary and isolated, it became a permanent and widespread conflict, as evident in excessive applications to the constitutional court, the use of veto power, etc. in the 1990s. Moreover, these tides also increased the frequency of constitutional changes. For example, a constitutional amendment was eventually made to the effect that the ministries in question belong to the prime minister.⁶⁶

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⁶⁵ For examples, see, Sedelius and Mashtaler, "Two decades of Semi-presidentialism: Issues of Intra-executive Conflict in Central and Eastern Europe 1991–2011" p. 120.

⁶⁶ *Ibid.*

It should be noted here that similar constitutional amendments of this character were made not to honour underlying principles but in accordance with the requirements of daily politics and cyclical interests. For example, the “presidential ministries” debate has also taken place in Ukraine, where confrontational cohabitation is frequently encountered. In this country, too, we see that certain ministers of internal affairs and foreign ministers were dismissed in connection with this same debate, in line with the tension between President Yushchenko and Prime Minister Yanukovich. But this was the tip of the iceberg. In reality, the conflict resulted from the pro-Western and pro-Russian political tendencies in the country. While Yanukovich openly pursued a friendly policy with Moscow, the Yushchenko government’s foreign minister was dismissed after he gave the green light to Euro-Atlantic integration and Russia condemned the Black Sea fleets in Crimea. However, Yushchenko reappointed a minister through the use of a decree and a court decision based upon it. But the Yanukovich government did not recognize this appointment, causing the tensions to grow even further. In fact, this tension has been an integral part of Ukraine’s recent history of democracy.⁶⁷

The political tension in these countries, which have experienced so many cohabitations, is so high that it has become normal for the incoming heads of state to criticize the constitutional framework and push its limits in a way that concludes in their favour, in order to strengthen their office. Thus, tradition has settled into a confrontational pattern, and the legitimacy of the already novice constitution has been constantly debated. The interesting thing, again, is that when the same actors fell from power, this time they switched routes towards a constitutional interpretation that would strengthen the powers of the prime minister.

Indeed, while incumbent heads of state interpret the constitution in a certain way, they can easily interpret it in the opposite way when they are in opposition. The overall outcome of this situation is a loss of constitutional stability, alongside a loss of value through devaluation by making it a tool of the power game. This loss of value has also led to a loss of time taken up with constitutional amendments instead of taking important political steps in the country. What is more, the inability to establish the legitimacy of the constitution, and the resulting spread of cynicism among the citizens can be identified as further outcomes of such conflicts.⁶⁸

In addition to the legal and political culture, the constant change in the balance of power – and the fact that this change is experienced at the level of “constitutional wars” – gives rise to a chronic problem of instability. The absence of a consolidated

The political tension in the countries that experienced so many cohabitations, it has become normal for the incoming heads of state to criticize the constitutional framework and push its limits in their favour.

⁶⁷ *Ibid.*

⁶⁸ *Ibid.*, p. 122.

political majority brings sudden changes in domestic and foreign policy, and the additional pressure created by these changes creates turmoil in the country. The colour revolutions in Ukraine (the Granite Revolution of 1990, Orange Revolution of 2004, and Euromaidan Revolution of 2014) were incidents of just this sort. With the constitutional amendments accompanying these revolutions, the country was thrown into turmoil, sometimes dominated by parliamentarism and other times by the presidency. Thus, a dialectical link emerged between the absence of institutional stability and the absence of political consensus in society.⁶⁹

A fate similar to that of Ukraine was experienced in Georgia, where a similar political order prevailed. The country had taken on a path of semi-presidency where the prime minister was central, then switched to a model where the head of state gained power as of 2004, as a result of the aforementioned turmoil and the colour (Rose Revolution) revolution in 2003. After 2010, this structure reverted to a semi-presidential model in which the president gained ground.

Looking at Africa, in the Arab Spring, which can be considered to be related to these colour revolutions, the link between semi-presidential government and institutional instability can be seen in the same way. The semi-presidential system brought deep institutional and political crises in Tunisia under the Ben Ali regime. After the Jasmine Revolution caused by these crises, the country could not change its semi-presidential route due to the expectations of different political actors. However, considering the structure of the constitution, it is not difficult to predict the emergence of new political conflicts.⁷⁰

C. Destructive Cohabitation

Despite a shared perception of cohabitation having a destructive effect, it cannot be proven that there is a direct link between this institution and the total suspension of democracy. In studies conducted exclusively on the subject, only twelve examples of semi-presidential systems are identified from the early 1980s to 2008 when democracy was put aside, and in only one of them (Niger) was this a direct outcome of cohabitation.⁷¹ Of course, indirect links between cohabitation and collapse are not ignored, but it is not always easy to establish the appropriate causal link.

⁶⁹ For the storyline, see, Andriy Tyushka, "A Liberationist Constitution? Maidan's Revolutionary Agenda and Challenges for Constitutional Reform in Ukraine", *European View*, Vol. 13(1), 2014, p. 21; Andriy Tyushka, "From Constitutional Volatility to Constitutional Stability: Any Chance to Reconcile Constitutionalism and Power Struggle in Ukraine?", *Historia I Polityka*, Vol. 16(23), 2016, p. 57.

⁷⁰ Jörg Fedtke, *Comparative Analysis between the Constitutional Processes in Egypt and Tunisia* (EU, 2014).

⁷¹ Elgie urges a cautious approach to the common understanding that says cohabitation is destructive for democracy. See, Robert Elgie, "Semi-presidentialism, Cohabitation and the Collapse of Electoral Democracies, 1990–2008", *Government and Opposition*, Vol. 45(1), 2010, pp. 29–49.

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Niger, which is the only example in which this bond is established, can be considered a “textbook” example on the topic.⁷² Mahamane Ousmane, who was elected president by the people in 1993, when no political party was able to obtain a majority in the parliament, appointed as prime minister Mahamadou Issoufou, the leader of the PNDS, one of the left-wing parties that supported him. After the prime minister’s party withdrew from the alliance and joined with the former ruling party MNSD, Ousmane dissolved the parliament and elections were held again. Following the renewed elections, a parliamentary majority was formed, this time against the president. The president appointed a prime minister with the support of this majority, and governmental cohabitation began in the country in February 1995. In this arrangement the parties clashed so much that the system became completely dysfunctional. The constitutional order was paralyzed, as both the president and the prime minister were unable to carry out the duties assigned to them by the constitution due to “strikes” held against each other, and due to their stubbornness. Before the new government was formed, the army stepped in on the day the president, as a solution, was going to dissolve the parliament one more time. As such, Niger’s first attempt at electoral democracy ended with a military coup. In this tragic example, the conflict arising from cohabitation reached a devastating level when the actors did not act responsibly, and the system was paralyzed. In a context where democracy did not stand firm, it was not surprising that the soldiers stepped in. This example is remarkable in terms of the fate that attends the fierce conflicts in countries where democracy is not genuinely recognized, and soldiers are provided with the role of saviours.

It should be noted here that the fate in question will not always be the result of the intervention of actors outside of politics. Sometimes, the instability created by the tension may cause one of the actors to take a step to dominate all other institutions and powers at once, leading to a “total” solution. In this regard, it seems meaningful to recall one of the most tragic sequences in history, the Weimar experience.⁷³

The Weimar Constitution of 1919, seeking especially to avoid the problems seen in the parliamentary government of the Third Republic of France, was intended to be a smart design. Although the constitution included the principles of parliamentary regime, it stipulated that the head of state in the second wing of the executive

The example of Niger is remarkable in terms of the fate that attends the fierce conflicts in countries where democracy is not genuinely recognized, and soldiers are provided with the role of saviours.

72 See, Leonardo A. Villalón and Rahmane Idrissa, “Repetitive Breakdowns and a Decade of Experimentation: Institutional Choices and Unstable Democracy in Niger”, in Leonardo A. Villalón and Peter von Doepp (eds.), *The Fate of Africa’s Democratic Experiments: Elites and Institutions* (Indiana University Press, 2005), p. 27-48.

73 For quantitative data and further explanations regarding the Weimar experience, see, Skach, *Borrowing Constitutional Designs*. Also, Ahmet Mert Duygun, *Dissertation: Das semipräsidentiale Regierungssystem der Weimarer Republik im Vergleich mit dem heutigen türkischen Regierungssystem nach den Verfassungsänderungen in 2007 und 2017* (Rechts- und Staatswissenschaftliche Fakultät der Rheinischen Friedrich-Wilhelms-Universität, 2019), p. 15-122.

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should be elected by the people. It was envisaged that a majority would be gained in the first round of elections, and if this was not possible, the person who received the most votes would be confirmed as elected in a second round in which the three leading candidates would participate. It was foreseen that the head of state, duly elected by the votes of the people, would not be symbolic but authoritative and effective. The power of the head of the state to bring all laws that were passed in the parliament to a public vote was recognized, alongside other powers of representing the state, concluding treaties and establishing international alliances, commanding the armed forces, and abolishing the parliament. It was also envisaged that the head of state may temporarily interfere with or suspend constitutional guarantees in order to establish public security and order. With all the powers granted and especially with this decree, the constitution provided a privilege to the head of state over the prime minister and over the parliament, with the power to abolish. The constitution, which placed the president in the position of “leader of the nation” and “guardian of the Constitution”, did not face serious problems for a certain period. However, the constitution did not introduce any measures against ideological polarization and the increase in the number of political parties under the multi-party structure in Germany in those years. Naturally, no party could win the legislative majority and short-term coalition governments were formed instead. So much so that in the fourteen years between 1919, when the Constitution came into force, and 1933, the beginning of the collapse, twenty-one coalition governments, nine of which were “minority governments”, were established. In the face of this instability, the head of state, equipped with strong powers, began to ensure the continuity of the executive at the macro level, on the one hand; and to undertake the function of the legislature by issuing a large number of decrees on the other.⁷⁴ The tendency of the parliament to issue fewer laws – alongside the tendency of the president to issue more decrees every year⁷⁵ – was strengthened with the 1929 economic crisis, and by 1933 the parliament was hardly convening.⁷⁶ The overall situation shook the trust of the German people, whose pride had already been hurt in the First World War, in their current politicians, and led to fundamental quests in the face of the depression created by the economic crisis. In such a context, the Nazis who won the elections, and exclusively Adolf Hitler who became the head of state, exploited the weaknesses of the system by using their constitutional powers to the fullest while Hitler finally made himself the sole decision-maker “Führer” by completely devalu-

74 So much so that 130 decrees were issued under Friedrich Ebert alone.

75 For example, the number of laws adopted in the parliament was ninety-eight in 1930, thirty-four in 1931, and five in 1932. The number of decrees issued in these years, respectively, was five, forty-four, and sixty-six.

76 In its final year, the number of days on which the parliament was in session was only thirteen.

ing the parliament and bringing the decree authority (the Enabling Act of 1933) to the level of “constitutional decree”.⁷⁷

As can be seen, there is a direct link between the Nazi regime and the cohabitation that emerged in the semi-presidential system. Undoubtedly, many factors strengthened this bond. Among them is the fact that an election system suitable for a semi-presidential model (for example, two-round legislative elections, the application of a threshold, or a setup that would reduce polarization to two in the second run of the presidency) had not been introduced. In fact, to express this as an output, cohabitation, which is the possible outcome of a semi-presidential system, creates government instability when combined with factors that cause coalition governments (e.g., ideological polarization, strict party discipline, and an electoral system that allows a large number of political parties to enter the parliament, etc.). In the resulting power vacuum, presidents with more constitutional powers will tend to fill the gap and may even transform the system in a totalitarian direction according to their ideological motivations. The Weimar experience, then, has shown that coups can develop not only from the military but also from within the politics itself, in the semi-presidential stalemate.

VI. INTERMEDIARY CONCLUSIONS

From what has been written so far, the following dozen conclusions can be drawn:

1. Semi-presidency is a government system that has seen a rapid increase of adaptation globally, especially in the last quarter of the twentieth century. But the reason for this increase is not that the system works better than other systems. It is due either to (i) the tendency of former colonies of France and Portugal to imitate the model of their respective colonizers after gaining independence, or (ii) for various reasons in the states established after the collapse of the Eastern Bloc (to reconcile the expectations of political subjects or the tendency of experts from outside politics, etc.).
2. Semi-presidentialism can be divided into two subcategories, “unreal semi-presidentialism” and “real semi-presidentialism”. In the first category, the head of state is either excessively incompetent or overly authoritative. In the second category, there are cases where sometimes the head of state and sometimes the prime minister prevails.

The Weimar experience, then, has shown that coups can develop not only from the military but also from within the politics itself, in the semi-presidential stalemate.

⁷⁷ The source of the decree which I designated as constitutional decree is an authorisation law, *Ermächtigungsgesetz*, of 1933. This shows similarity with the case of Turkey in excluding the presidential decrees from judicial review. See, Tolga Şirin, “Anayasa Hükmünde Kararname”, *Güncel Hukuk*, Kasım 2016.

3. Semi-presidential models are more effective and democratic as the powers of the head of state remain symbolic and the system comes closer to parliamentarism.
4. The emergence of models in which presidents are elected by the people is generally a result of historical developments, and particularly a reaction against monarchies.
5. In cases of semi-presidential governments, it cannot be said that there is a contradiction between having symbolic powers and being elected by the people, because the popular vote has nothing to do with executive targets but aims to materialize a supra-party consensus.
6. Cases of semi-presidential governments in which the head of state has too much power, if there is no consensus culture, democratic tradition, or economic development to curb this, easily take the form of “hyper-presidentialism” and the system moves away from democracy (Russia being the prototype of such a case).
7. The fact that the prime minister is stronger than the head of state in real semi-presidencies is a factor that contributes to the functioning of the system within the limits of democracy.
8. The preference to bring the head of state to the fore in real semi-presidencies (e.g., France) results from a reaction to past problems of government stability.
9. In real semi-presidencies where the head of state is at the forefront, if there is a unified administration, the system is similar to the presidential system, whereas in cases where cohabitation occurs, the prime minister comes to the fore.
10. In the aforementioned semi-presidential cases, clear demarcation of constitutional powers and social and political factors that will prevent the head of state from being manipulative can ensure the functioning of the system.
11. The test for real semi-presidential governments is either arithmetic or behavioural cohabitation. Cohabitations can have confrontational and even destructive forms as well as conciliatory forms.
12. In the absence of factors such as a culture of reconciliation, a tradition of democracy, institutionalization, low-level polarization, flexible political party structure, a stable electoral system, and economic well-being, either a totalitarian interference by the president holding strong powers or an armed coup by the army is possible.

Having formed these conclusions, it is now feasible to question the practicality of such a system in Turkey.

PRACTICALITY OF THE SEMI-PRESIDENTIAL SYSTEM IN TURKEY

The practicality of the semi-presidential system in Turkey can be put to test through (i) cases of divided governments, (ii) government stability, (iii) political polarization, and (iv) the regime of political parties.

I. CASES OF DIVIDED GOVERNMENTS

Turkey is a country where strong heads of state (“Great Leader” Mustafa Kemal Atatürk and “National Chief” İsmet İnönü) were active in its foundation. Although there was no discussion of partisanship during the single-party period (1923–1950), this became a problem when the multi-party system was adopted, and the partisanship embodied in “Bayar’s Walking Stick” during the Democratic Party period (1950–1960) became a matter of criticism. The 1961 Constitution, which was the product of the reaction to this process, adopted a design in line with classical parliamentarism, and during this period (1960–1980), presidents with military backgrounds had a symbolic function.

Turkey’s first semi-presidential experience took place after the coup of 1980. Although the constitution designed a parliamentary model in which the executive was strong, Kenan Evren, the leader of the military coup, had his presidency voted simultaneously with the constitutional referendum. This meant that the head of state was elected by the people for the first time.

General Evren, who set himself the mission of “Turkish de Gaulle”, did not choose to be the determinant of the executive after the elections held in 1983. Although the constitution gives the president the authority to “preside over the Council of Ministers or to call the Council of Ministers to a meeting under his presidency” (art. 104), in essence this authority had not been used. Therefore, Turkey’s first semi-presidential experience was largely in line with parliamentarism since Kenan Evren came to power illegitimately and was not a politician but a soldier.

Turkey’s first semi-presidential experience took place after the coup of 1980.

Although President Turgut Özal was elected by the Grand National Assembly of Turkey, on occasion he did not hesitate to state that the regime was “semi-presidential-like”. This situation led to the excessive politicization of the presidency and some amount of conflict during the Özal period (1989–1993). Özal’s statements in this period show that he perceived the government system (even though he was not elected by the people) to be semi-presidential. Özal, whose connection with his party was legally broken, tried to maintain his primacy informally by electing an ineffective leader, and even intervened indirectly (for example, having his wife Semra Özal elected as the provincial head of the Istanbul office of the party). Such tensions reflected on the government (for example, the sacking of the Minister of Defence Hüsnü Doğan due to his opposition to Semra Özal’s candidacy), and the president’s partisan orientation was evident in his authority to make appointments⁷⁸ and in his active engagement in daily politics, especially with regard to economic issues. A good example of this was his tendency to become provocatively involved in the tense debates triggered by the workers’ protests known as the “Spring Protests”. Similarly, he gave himself a decisive mission in the context of the Gulf War.⁷⁹

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This politicized and effective presidential trend naturally led to reactions from other political actors. Such reactions, shy on the part of his own party, were expressed much more openly on the opposition front and even had some practical consequences. For example, the government made attempts to restrict some of the powers of the president, but these attempts were restrained either by veto or by decisions of the constitutional court.⁸⁰

In addition, this presidential diversion triggered practices in the system that had not been experienced until then. Incidents such as the public display of the conflict between himself and Prime Minister Süleyman Demirel at the signing ceremony of the Economic Cooperation Agreement of the Black Sea Region Countries; the resignation of Chief of Staff Necip Torumtay in the context of national security; the direct targeting of the President of the Republic by hundreds of thousands of workers concerning the economy; and the parallel *Anıtkabir* (Atatürk’s Mausoleum in Ankara) commemorations all served to create a landscape of “divided government” in Turkey, which was not yet semi-presidential on paper.⁸¹

78 For instance, his appointment of Saime Akbulut, the wife of Yıldırım Akbulut to whom he left the seat of the party chairman and prime minister, caused criticism, as did the appointment to higher courts of people who were not careful with the principle of secularism, while one of these appointments was overruled by the Constitutional Court. The Court decided that Süleyman Arslan, a professor from Selçuk University, did not meet the conditions for being a member of the tribunal. See, AYM, E. 1992/4 (Değişik İşler) and K. 1992/3, T. 17/11/1992.

79 About the Özal years, see, Suavi Aydın and Yüksel Taşkın, *1960’tan Günümüze Türkiye Tarihi* (İletişim Yay., 2016); Mehmet Ali Birand and Soner Yalçın, *The Özal: Bir Davanın Öyküsü* (Doğan Yay., 2001).

80 AYM, E.1992/37, K.1993/18, T. 27/04/1993.

81 Kemal H. Karpat, *Türk Dış Politikası Tarihi* (Timaş Yay., 2012); Rıdvan Akın, *Gazi’den Günümüze Cumhurbaşkanlığı* (Türkiye İş Bankası Yay., 2009).

Such tensions also occurred during the period of the left-Kemalist Ahmet Necdet Sezer (2000–2007), who, although not active in politics, took on the function of being an active guardian of the constitution, by sending back laws and filing cases of annulment before the Constitutional Court. So much so that during the first of these divided governments, there was a historic economic crisis; and in the second, a conflict known as the “constitutional wars” featuring the closure case of the governing AKP and military intervention, in what was known as the e-memorandum. These incidents showed how serious potential conflicts can get in Turkey, even under a parliamentary regime.

Turkey emerged from this period with a “semi-presidential” design. This was a gradual process and the division in the administration did not happen during the presidency of Abdullah Gül (2007–2014), who remained in office according to the parliamentary criteria until 2014 when a semi-presidential model would come into effect.⁸²

Turkey’s real semi-presidential experience, then, occurred in the years between 2014 and 2017, when the president was elected by the people and Ahmet Davutoğlu – from the same party – served as prime minister. These three years showed that a “divided government” can easily become an issue even when the government is run by people of the same political leanings. Three of the many tensions of this period are especially worth attention in this paper.

First, President Recep Tayyip Erdoğan pushed the limits of the constitution exceedingly and went beyond his status. For example, although the constitution prohibits the president from “being a party member” and stipulates “impartiality”, the practice did not comply with this requirement.

Second, after the loss of the parliamentary majority in the elections held in June 2015, Recep Tayyip Erdoğan gave the task of forming the government to AK Party Chairman Ahmet Davutoğlu, but a government could not be formed even after forty days (09/07/2015–18/08/2015). The length of the time provided to Davutoğlu and the failure to provide the same opportunity to the leaders of other parties within the remaining five-day period (the constitution stipulated forty-five days before triggering re-election), created a situation counter to the constitution’s design regarding the system of government.⁸³

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82 Although the two reacted differently to the Twitter judgement of the Constitutional Court, the Gezi Park Protests, and the corruption investigations of 17 December 2013, these did not become issues of conflict.

83 A similar problem was observed when President Süleyman Demirel appointed the independent Yalın Erez (former DYP member) and the process lasted for forty-two days. Preventing such abuses required the constitutional provision on the matter to be more specific, which was not the case.

Third, Turkey experienced behavioural cohabitation after the 2014 November elections, although it was arithmetically unified in the government. This caused the constitutional provision of the authority “to preside over the Council of Ministers when he deems it necessary or to call the Council of Ministers to a meeting under his presidency”, which had not been actively implemented for a considerable period, to be put in practice. This situation caused a conflict of authority. The tension between Erdoğan and Davutoğlu first came to light in the determination of the MKYK list at the AK Party’s 5th Grand Congress on September 12, 2015. Next, at the AK Party MKYK meeting held on April 29, 2016, it became more visible when the authority to make appointments within the party organizations was taken from the party chairman and transferred to the MKYK. Then, in the document titled “*Pelikan Dosyası*” which was distributed to the public on the internet under an anonymous name, it was stated that there were twenty-seven conflicts between the two. This sequence of incidents caused Davutoğlu to resign from the party. In this process, the accusations used by the conflicting sides against each other, such as implying a “coup”, showed how high tension can arise even in a unified government.

Experiences show us that, in Turkey, the strengthening of the presidency brings with it either conflicts or more authoritarian notions.

This tension showed that the semi-presidential regime was not working in Turkey – but, thanks to the attempted military coup on 15 July 2016, did not trigger a change towards the symbolization of the presidency, and instead resulted in a design that would create a “hyper presidency”.

In Turkey’s current system termed “presidential government”, the president is even stronger than in Russia, the prototype of hyper-presidential models.⁸⁴ In the years since the attempted coup, Turkey has experienced the biggest economic crisis in its history and faced deep political crises.

As a result, these experiences show us that, in Turkey, the strengthening of the presidency brings with it either conflicts or more authoritarian notions.

II. GOVERNMENTAL STABILITY

In Turkey, generally, quests for a system of government are founded on the issue of government stability. These complaints are so widespread as to produce a perception that governmental instability is the norm while stable governments are exceptional cases. However, the reality is quite different.

84 Demet Çelik Ulusoy, “Measuring Presidential Powers: New Governmental Design in Turkey”, *Ankara Üniversitesi Hukuk Fakültesi Dergisi*, Vol. 70(3), 2021, p. 1013-1105; Özsoy Boyunsuz, “The AKP’s Proposal for a ‘Turkish Type of Presidentialism’ in Comparative Context”, p. 68-90.

1. History of Governments

Since the 1908 Revolution, the government system has been along the axis of parliamentarism, and periods of government stability are in the majority. Looking at this history, it can be seen that minority governments rarely took office.

Minority Governments	Parties	President	Period
28 th Gov.	CHP + Independents	C. Gürsel	1 year 57 days (25/12/1963 - 20/2/1965)
38 th Gov.	Non-partisan	F. Korutürk	134 days (17/11/1974 - 31/3/1975)
40 th Gov.	CHP	F. Korutürk	30 days (21/6/1977 - 21/7/1977)
43 rd Gov.	AP + MHP + MSP	İ. S. Çağlayangil (dep.)	305 days (12/11/1979 - 12/9/1980)
51 st Gov.	DYP	S. Demirel	25 days (5/10/1995 - 30/10/1995)
53 rd Gov.	ANAP+DYP	S. Demirel	114 days (6/3/1996 - 28/6/1996)
56 th Gov.	DSP	S. Demirel	137 days (11/1/1999 - 28/5/1999)

The first two of these minority governments survived the military coups of 27 May 1960 and 12 March 1971, in line with the expectations of the army. Despite the electoral victory of the CHP (Bülent Ecevit), the 40th government which could not win the legislative majority was short-lived due to the resistance of the Nationalist Front alliance. Eventually, the 2nd Nationalist Front coalition came to power and survived for a year, but the polarization in this period prevented the presidential election and the government ended with the coup of 12 September 1980. The 51st, 53rd, and 56th governments were short-term attempts during the coalition failure years of the 1990s. Of these, the DSP government was able to stay in power by getting stronger due to some specific developments (the capture of Abdullah Öcalan) while leading the country to elections.

This is the case for minority governments, yet when viewed from a broader perspective, the number of majority coalitions in Turkey is also low:

Period	Years	Government(s)
Single Party Regime	1923-1950	CHP
Single Party Government	1950-1960	DP
		(MILITARY COUP)
Military Government	1960-1961	Gürsel Government
Grand Coalition	1961-1962	CHP-DP
İnönü Governments	1962-1965	CHP-CKMP-Independents
Single Party Government	1965-1971	AP
		(MILITARY COUP)
Technocratic Government	1971-1974	Ürgüplü, Erim, Melen, and Tulu governments
<u>Coalition Government</u>	<u>1974</u>	<u>CHP-MSP</u>
Technocratic Government	1974-1975	Irmak Government
<u>Coalitions</u>	<u>1975-1980</u>	<u>Nationalist Front and Güneş Motel governments</u>
		(MILITARY COUP)
Military Government	1980-1983	Ulusu Government
Single Party Government	1983-1991	ANAP
<u>Coalitions</u>	<u>1991-2002</u>	<u>DYP-SHP, Anayol, Refahyol, Anasol-D, Anasol-M governments</u>
Single Party Government	2002-2022	AK Party

The argument indicating the existence of governmental stability due to the parliamentary regime in Turkey is disputable.

As can be seen in the table, leaving aside the grand coalitions and technocrat administrations formed in the aftermath of military administrations, Turkey experienced coalition governments mainly in the second half of the 1970s and the 1990s. In this respect, the coalition problem occupies less than a quarter of the hundred-year history of the Republic. Undoubtedly, these coalition experiences cannot be considered successful compared to their European counterparts (e.g., Germany). Although these coalitions have not always worked in a long-term and healthy way, they have produced some positive outcomes. For example, the ANASOL-M government, which was established in 1999, carried out one of the most advanced constitutional changes in the history of Turkey in 2001 and to a large extent removed the burden of the 1980 coup on the 1982 Constitution.

Thus, the argument indicating the existence of governmental stability due to the parliamentary regime in Turkey is disputable.

2. Other Aspects of Stability

The concept of stability cannot be reduced to governmental stability alone.⁸⁵ Stability also has dimensions in the economy, law, regime, and national security. Governmental stability may not always meet these dimensions. The fact that one of Turkey's most important economic crises began in 2018, when a single-headed, effective, and authorized executive was in charge, is a recent example of the fact that governmental stability does not guarantee economic stability.

In these recent years, a preference for decrees over laws that are adopted by the parliament is visible, almost to the point of a regime of decrees, and this also demonstrates that stability of the government may not bring stability of the law. Further confirmation can be found in the fact that almost two-thirds (fifty-three) of a total of seventy-nine presidential decrees issued during the first three years of the "à la Turca presidentialism" were intended to consolidate the government by making amendments to twenty-six different basic decrees, some of which introduced rules in a personalized and volatile manner.⁸⁶

In addition, the claim of the Constitutional Court that the AK Party, which came to power single-handedly, was "the focus of actions contrary to the principle of secularism", alongside the levels of infiltration by religious groups into the state in this period, as revealed on 15 July 2016, indicate that governmental stability can also create a regime stability problem.⁸⁷ In the same period, the ease of crossing the south-eastern borders of Turkey and the links established by ISIS militants revealed that there were similar problems regarding the stability of borders.

As can be seen from these incidents, governmental stability is not a guarantee of other forms of stability, and it can sometimes be a direct cause of instability. And yet, in the discussion of the government system, it is necessary to take into account other topics as well as stability.

It is observed that the over-strengthening of governmental stability in Turkey creates problems of stability in other fields.

III. POLITICAL POLARIZATION

In Turkey, which is located both in the Mediterranean basin and in the Middle East, polarization and impetuosity have penetrated not only in political life but also in

It is observed that the over-strengthening of governmental stability in Turkey creates problems of stability in other fields.

85 İler Turan, "İstikrar Ne Anlama Gelir?", in İ. Ö. Kaboğlu (ed.), *Türkiye'nin Anayasa Gündemi* (İletişim Yay., 2017) p. 86.

86 For the figures, see, Tolga Şirin, "Normlar Heterarşisi ve Neo-fermanlar", *Birikim*, 3 November 2021, <https://birikimdergisi.com/guncel/10771/normlar-heterarsisi-ve-neo-fermanlar> For examples, see, Gözler, "Cumhurbaşkanlığı Hükümet Sisteminin Uygulamadaki Değeri: Bir Buçuk Yıllık Bir Bilanço" (accessed: 13/03/2022).

87 Şirin, "Normlar Heterarşisi ve Neo-fermanlar", *op. cit.*

the fabric of social life. As in many countries with geographical similarities, Turkey has a high level of political polarization. This polarization, which manifested in various rebellions during the formative years of the Republic, continued to escalate after the transition to a multi-party system, so much so that military coups happened at ten-year intervals. The level of polarization was recognized in the preamble of the 1982 Constitution with the words “at the time when an unprecedented divisive and destructive bloody civil war in the Republican era was approaching the point of realization [...]”.

Ethnic, religious, sexual, and political tensions were not missing in the era opened by the 1982 Constitution and further increased during AK Party years. This has been confirmed by some objective research. For example, according to the report titled “The Dimensions of Polarization in Turkey” and published by the *Turkuazlab* Project carried out under the leadership of Istanbul Bilgi University Migration Studies Application and Research Centre, more than half of the society perceives an increase in disagreements.⁸⁸ When the reasons for this perception were queried, the Kurdish question and the 15 July coup attempt predominated.

According to the same report, as of 2020, more than 70% of the society does not want to do business with or want their child to marry those affiliated with the party that they feel distant from. Again, more than 60% of the society states that they do not want such a person as a neighbour, and that they will be unhappy if children of such persons become friends with their children. On the other hand, the rates of “echo chambers”, that is, being isolated from the views of others, are also high. The rate of those who say that they have a consensus on political issues with people close to them is 70%.

These results show that, in Turkey, polarization which stands as a threat to semi-presidential government systems is well above the acceptable limits.

IV. POLITICAL PARTIES

The political party order in Turkey is based on certain characteristics.

First of all, voter preferences are mostly grounded in tradition and seem relatively unchangeable. Voters generally have a strong tendency to vote for the same or a similar political party. This may be a positive factor against the possibility of cohabitation.

Second, it should be noted that a multi-party structure has long been established. The relationship between political parties and their supporters is not based on flexible ties and weak ideological engagements as in the USA, but on stronger ties and

In Turkey, polarization which stands as a threat to semi-presidential government systems is well above the acceptable limits.

⁸⁸ For details of the research, see, <https://www.turkuazlab.org/ilgili-projelerimiz/turkiyede-kutuplasmanin-boyutlari-2020/> (accessed: 13/03/2021).

solid ideological/cultural affinities as in Europe. This is a negative factor where tensions are expected to be overcome by consensus.

Third, the level of intra-party democracy in Turkey is quite low. In the overwhelming majority of political parties, primary elections are not applied for nominating the candidates, the provisions of the party bylaws are applied arbitrarily, and an order defined as the “leading authority” prevails. In Turkey, weak intra-party democracy is accompanied by greater discipline within the ranks of the party. Disciplinary sanctions are imposed on members who disobey the decisions taken by the party, and these decisions are not easily overturned by the judicial organs. As such, the energy arising from intra-party tensions cannot be discharged and parties split in the end. Together with ideological diversity, this is a root cause for the surplus in the number of parties.

Fourth, electoral systems based on proportional representation have been implemented in Turkey, except for the single-party period and the multi-party experience based on that system. Even though, and especially in the 1980s, factors that increase stability in the administration were promoted, justice in representation was not neglected. This situation resulted in an excess of political parties, and society became accustomed to this multitude of parties over time. In fact, some problematic fields, especially the Kurdish question, demand the existence of more than two political parties. Therefore, the traditional and cultural situation is not suitable for reducing the political party order to a dualist model, which is assumed to be more compatible with the semi-presidential order. The failure of the bipolar construct of the “presidential government system” can be seen to support this argument.

Fifth, the absence of democracy within the party and the reflection of the leader’s dominance outside the party creates the phenomenon of a “leader cult”. In politics, personal virtues have always been at the forefront rather than principles and programmes. Especially during the AK Party period, the strengthening of Recep Tayyip Erdoğan’s “personality cult” also spread to the opposition parties. This culture paves the way for leaders who gather the votes of more than half of the electorate and have sufficient powers to see themselves above other political actors, push the limits, and display a hyper-presidential or even totalitarian orientation.

Sixth, there is a certain correlation between ethnic and sectarian identities in the voters’ relations with their political parties. For example, voting can be associated with, ethnically, identifying as Kurdish for HDP voters and Turkish for MHP voters; and on the other hand, on a sectarian basis, with Alevism for CHP voters and Sunnism for AK Party voters. This situation brings with it the possibility of a field of politics based on the objective characteristics of citizens rather than their sub-

Factors related to the government system in Turkey create precarious conditions for systems that open the gates to majority-oriented, non-plural practices such as the presidency and the semi-presidential government.

jective will. This means that the system is an equation based on a majority power of Turkish-Islamic synthesis and a minority Kurdish or Alevi opposition. But in a highly polarized country like Turkey, grounding the political space on such fixed identities can have dangerous consequences, the worst being civil war.

As a result, these factors related to the government system in Turkey create precarious conditions for systems that open the gates to majority-oriented, non-plural practices such as the presidency and the semi-presidential government.

CONCLUSION

To summarize what has been written so far, these ten points can be deduced.

First of all, the existence of a separate political regime called “semi-presidential” is doubtful. There is no consensus on the meaning of this category, which has become widespread in the literature with the definition proposed by Duverger in France. However, even if it is generally defined as a parliamentary regime where the head of state is elected by the people, the categories become slippery due to the powers of the head of state and the details of the formation of the other wing of government. It is not clear what exactly is being proposed, and the public debate cannot progress transparently.

Second, although the semi-presidential regime seems to be widespread, it is doubtful whether this is due to the good functioning of this approach. It is not appropriate for Turkey to copy the models adopted in countries that gained independence from France and Portugal, or to use as a precedent the preference which prevailed while leaving behind the one-man rule in post-Stalinist states.

Third, the form of diversion which we describe in this study as “unreal semi-presidentialism” is essentially an autocracy in which even political change is no longer possible. This model, of which Russia is the prototype, is not suitable for a country that aims for democratization. Semi-presidential designs in Turkey are risky as they exhibit such a tendency in practice.

Fourth, parliamentary diversions in the category of “unreal semi-presidential government”, in which the head of state is endowed with symbolic powers, are democratic examples. However, certain historical conditions gave rise to these cases. This model, for which states such as Ireland and Iceland can be considered as prototypes, is informed by the role of the president during independence and the traditionally symbolic character of presidents. It is unrealistic to import it to countries that do not have such a background, such as Turkey.

Fifth, the model that we describe as “real semi-presidential government” is fully manifested in France. In this model, according to election results, the central role is played sometimes by the president and sometimes by the prime minister, who heads the Council of Ministers. This variability emerges according to the political conjuncture, and the political system can survive because the actors are open to making certain concessions. The most important source of tension in this model is the division of the government. In such cases, cohabitation takes place not thanks

to the system but despite it, under the influence of social and cultural factors. The existence of these conditions in Turkey is doubtful.

Sixth, there are multiple types of divided government. Of these, the ones originating from a coalition or a minority government are the most fragile. This fragility depends on the existence of a culture of consensus and the structural foundations that regulate it. In their absence, as in the case of Weimar, conflicts can reach destructive levels. Turkey's current political culture, the structure of political parties, and historical experience have shown that the probability of such a consensus is low. The tensions between Erdoğan and Davutoğlu showed that even between actors from the same party, conflicts (as the usage of coup terminology indicates) can easily occur. It has been tried to overcome this problem not by moving to a more collective model, but, in 2017, by switching to a presidential variant in which the executive was strengthened further.

Seventh, the current powers of the president in Turkey are higher than those of presidents in systems such as the US presidency and the so-called semi-presidential system as in Russia, which is actually defined as hyper-presidential. This has autocratic consequences. The antithesis and antidote to this problem is to make the government more collective. In this respect, it is necessary to discuss the parliamentary system as a more reasonable model.

Eighth, well over a hundred years since its 1876 Constitution, Turkey's historical conditions, its geographical location as a European country, its psychological situation where there is a need to overcome the myth of one man, and its structural conditions characterized by a high-level social polarization and party discipline show that the time is ripe for a parliamentary system.

Ninth, the second half of the 1970s and the 1990s when the parliamentary model created a problem of governmental stability are distinctive. On the other hand, especially in the period when semi-presidential and presidential-derived models were implemented, problems related to the borders, administration, legal, economic stability, and again even governmental stability arose.

Tenth, there is a remarkable correlation between the colour revolutions and related coups and crises of the twentieth century, and semi-presidential regimes. The examples of Georgia (Rose Revolution), Ukraine (Orange Revolution), Tunisia, and Egypt (Arab Spring) are remarkable in this regard. In cases that do not meet the necessary conditions, semi-presidential models can create destruction.

It seems that healthy conditions for such a model do not exist in Turkey. Government models that allow one person to come forward, including semi-presidential models, should not be considered viable options for Turkey.

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Federal Foreign Office

TURKEY'S SEARCH
FOR A NEW
POLITICAL
SYSTEM

04

SEMI-PRESIDENTIAL
SYSTEM AND THE
CASE OF TURKEY

The system debate is arguably the most pressing and consequential subject of Turkish politics. Turkey has been having a governmental system discussion for a period of time, and the next few years will appear to be in intense debate and search.

Turkish parliamentary system experience (1876-2017) often dealt with interruptions. As a result, it has not only failed to produce general satisfaction in politics and society but also has been unsuccessful in yielding economic stability. Similarly, the outcome of the last five years of the Presidential Government System (or the Presidential System with its widespread use) could not generate stability.

The search and discussion of the governmental system appear to be the most critical topic of politics for the next few years. Regardless of the outcome of the June 2023 elections, the system debate will be the most crucial topic of politics in the short term.

Meeting this demand and preparing enhanced research on the governmental system will play an essential role in the quest for a possible change.

Comprehensive research should present a comparative, global, political, and constitutional base for the debates and assist decision makers in political parties and the public in finding an enriched discussion floor.

Within the framework of this program, Ankara Institute plan to publish ten academic analyzes that will contribute to the search for systems over the next year in order to meet this end.

The research plans to conduct two workshops with the participation of stakeholders that we predict will contribute to the system discussion and hold a detailed public opinion survey.

This study in which Tolga Şirin evaluates the semi-presidential system through the theoretical principles, implementation of the international experiences as well as its practicality in Turkey is the fourth of the academic contribution series that made out of 10 reports.