

**Beyond Presidentialism and Parliamentarism. Democratic Design & the Separation of Powers.** By Steffen Ganghof. Oxford: Oxford University Press, 2021. 224p. \$85.00 cloth.

**Democracy and Executive Power. Policymaking Accountability in the US, the UK, Germany, and France.** By Susan Rose-Ackerman. New Haven: Yale University Press, 2021. 424p. \$65.00 cloth.

**Comparing Cabinets. Dilemmas of Collective Government.** By Patrick Weller, Dennis C. Grube, and R.A.W. Rhodes. Oxford: Oxford University Press, 2021. 288p. \$100.00 cloth.

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The political executive has been an established subject of study in political science for decades. Early research was often dominated by single-country studies or approaches that built their assumptions on the institutional structure and practices of classic archetypes, while truly comparative approaches only emerged later. Nevertheless, to this day the field remains highly heterogenous in both theory, method, and focus of research (e.g., see Rudy Andeweg et al., eds., *Oxford Handbook of Political Executives*, 2020). The three books reviewed here are indicative of this heterogeneity – although the authors address interrelated questions of executive accountability and the practice of democratic executive governance that are at the core of many studies of political executives and even cover some of the same cases in their empirical analyses, the books arguably each represent a different stream of the literature.

Steffen Ganghof's *Beyond Presidentialism and Parliamentarism* asks how we can achieve a clear separation between executive and legislative power, but without excessive 'executive personalism', i.e., the concentration of executive power in a single individual, that has – on both theoretical and empirical grounds – long been accepted as a major flaw of presidentialism. Ganghof's answer to this question is 'semi-parliamentarism' – a system of government in which (1) the chief executive is not directly elected, (2) there are two directly elected legislative chambers, (3) the government is only accountable to one of the chambers, and (4) the other chamber has a veto over legislation that can only be overturned by a supermajority (p. 36). Thereby, the book not only discusses semi-parliamentarism per se, but also uses it to breathe new life into scholarly debates on regime types. Susan Rose-Ackerman's

*Democracy and Executive Power* is likewise concerned with improving the democratic accountability of executive actions, albeit at the level of implementation. Across democracies, bureaucracies are increasingly tasked with resolving policy issues left open in statutory texts. As Rose-Ackerman argues, these procedures are a practical necessity; however, in order to suffice as democratic ideals, they must be accompanied by mechanisms that allow for public input and accountability to give them democratic legitimacy. Questions of executive accountability and legitimacy also play an important role in Patrick Weller's, Dennis C. Grube's and R.A.W. Rhodes' *Comparing Cabinets*; however, they reject the notion that formal institutional rules (alone) are the key factors in the shaping of executive action in the form of collective cabinet decision-making. Instead, they posit that 'we need to better understand the beliefs and practices of those involved in governing if we are to unravel the continuing dilemmas at the core of government' (p. 3). This brief summary of the books' key arguments and approaches highlights the challenges of relating these works as well as their contributions and weaknesses in a single review. Nevertheless, by considering them together common themes emerge nonetheless and highlight important avenues for future research.

Comparative executive studies, irrespective of focus, have often been characterized by the insistence on established categories and approaches. In this regard, all three works are able to make important contributions as they break with conventions and offer new perspectives. In the case of Ganghof's book this concerns his critical engagement with presidentialism and regime types, which goes markedly beyond the commonly rehearsed 'perils of presidentialism' and 'virtues of parliamentarism' originally identified by Juan J. Linz. While executive personalism has – on both theoretical and empirical grounds – long been accepted as a major flaw of presidentialism by comparative scholars, Ganghof's proposal of an innovative and workable constitutional design beyond those commonly identified in the literature illustrates how this can be avoided on a theoretical level. Simultaneously, his analysis likewise provides some empirical validation for his claims. Ganghof identifies the Australian Commonwealth as well as five of its federal states (New South Australia, New South Wales, Tasmania, and Victoria) and Japan as real-world examples of semi-parliamentarism (although not all fit the theoretical ideal type to the same degree). In subsequent analyses – that also include 21 other parliamentary and semi-presidential democracies – he shows that semi-parliamentary regimes are able to integrate both simple and complex forms of majoritarianism (other cases typically only embody one) and compares their performance in terms of cabinet stability, issue-specific coalition-building, and legislative success.

The particular strength of Rose-Ackerman's work can likewise be found in the fact that her book goes in many ways beyond established disciplinary boundaries and makes proposals that have the potential to inform real-life debates. Focusing on France, Germany, the United Kingdom, and the United States, she does not merely compare legal regulations and their interpretations in different jurisdictions (a method frequently employed by comparative legal scholars). Instead, she provides an exceptionally thorough and nuanced overview of the historical origins and practices of executive policymaking, and critically interrogates the advantages and challenges in each case. Her use of cases from common law (UK, US) and civil law jurisdictions (France, Germany) thereby strengthens her final proposal of a seven-point agenda for reform that combines practices with increased democratic legitimacy and accountability of executive policymaking. Finally, the volume by Weller, Grube, and Rhodes excels in opening the 'black box' of cabinet government. By using interviews with cabinet members, political advisors, civil servants, and experts in Australia, Denmark, Switzerland, the Netherlands, and the UK, the authors not only bring to light the general traditions and practices of cabinet government as well as their historical evolution, but also provide specific examples of how actors managed the manifold 'dilemmas' of cabinet government.

The above contributions and the scholarly quality of the contributions notwithstanding, each book also faces certain limitations. Most of these are explicitly addressed by the authors – e.g., Ganghof shows that he is acutely aware of the scepticism that his proposal may encounter – not only because its empirical application is largely limited to subnational regimes and much of the discussion must thus remain at a conceptual level, but also because he seeks to make an addition to the (rigid) established vocabulary used to label regime types and describe constitutional arrangements. Similarly, Weller et al. note that their sample of interviewees – albeit considerable – is not necessarily representative and warn against generalizing from the empirical evidence presented in the book. Rose-Ackerman, too, is careful to point out that her proposed model of executive accountability is to be understood as 'just a sketch, not a blueprint' (p. 270) that may best operate in wealthy and middle-income countries.

One common and perhaps insufficiently acknowledged drawback of all three works relates to the fact that the authors focus first and foremost on established, Western democracies (the clear exception to the geographical criterion being Ganghof's consideration of Japan). For Ganghof, this focus is in part justified by empirical realities – semi-parliamentarism is simply only found in Australia, its federal states, and Japan. Yet cases for comparison are also exclusively drawn from Western Europe, Canada, and Israel, without an explicit justification

for this focus (pp. 169-170). The consequences in terms of the study at hand may be minor, yet it does introduce a bias in the average performance of different regimes when 'middle-aged' democracies (e.g., Central and Eastern European EU member states) or those in parts of the world that do not necessarily share the same cultural-historical background are not considered in equal measure.

The focus on established Western democracies also affects parts of Rose-Ackerman's work. In particular, she declares that her 'book aspires to establish some basic principles of public law that apply to democracies *everywhere*' (p. 12; emphasis added). Nevertheless, she too focuses her attention on four well-studied countries with century-old bureaucracies and a firmly established rule of law. While some potential applications to other countries (Argentina, Philippines, Hungary, and Poland) are considered as part of the last chapter and she highlights the suitability of her proposals to middle- and high-income countries, these discussions remain rather anecdotal and do not fully take into account the necessary preconditions to implement some of her reform proposals in practice. For instance, while laws that facilitate the establishment and accountability of civil society groups (p. 266) may prove helpful in fostering executive accountability, it still requires the presence of a strong civil society and particular socio-cultural norms to make this an effective measure. Although the author makes a convincing argument for importing and integrating models to enhance local practices, the question of how far her proposals can travel remains an open one.

Weller et al. acknowledge very explicitly that their personal reference point is the Westminster system of Australia and the UK (pp. 28-29). Given their focus on personalities and established informal practices over institutions, the UK system with its unwritten constitution, in particular, also serves as the main reference point for comparison throughout the book. Although it is not the authors' aim to generalize from the thick description they provide throughout the volume, this emphasis and their case selection (four monarchies, one republic; none having experienced regime-changing events during the last 150 years) nonetheless has unacknowledged consequences that limit the insights produced. This becomes particularly evident in their concluding claim that '[c]abinet government is properly understood as the product of a long history, emerging from a situation where monarchs ruled and where they gradually ceded the reins of government to executive institutions' (p. 233). Not only does this not apply to the Swiss case, which they also analyse at length, but it also fails to relate to the vast majority of parliamentary democracies that arguably practise cabinet government without having experienced the same long-term evolution (e.g., Estonia) or experienced major

breaks in their history that invalidated most if not all practices from their monarchic past (e.g., Germany). Hence, one is left wondering whether the authors believe that cabinet government is not possible beyond the cases they describe, or whether they do not after all subscribe to a very specific definition of the term (despite refraining from endorsing any at the outset of their study, p.4).

As mentioned above, the three books represent (vastly) different theoretical and methodological approaches. In each tradition, the works present major advances and have the potential to lay the foundation for further research. Any criticism that seeks to elevate one over the other approach or argument concerning how comparative studies of executive politics ought to be conducted would hence be unproductive to encouraging dialogue among them. Rather, at the end of this review it appears pertinent to highlight some examples of how particular features of the works complement each other and could, if pursued further, lead to significant new insights. For instance, both Ganghof and Weller et al. discuss the case of Australia, yet while Ganghof focuses on institutional arrangements Weller et al. provide the nuanced analysis of practices that have evolved within them. Similarly, Rose-Ackerman and Weller et al. complement each other by analysing executive policymaking at and below the cabinet-level. Ganghof's stricter differentiation between institutional arrangements and patterns of political competition could on the other hand help to sharpen parts of Rose-Ackerman's analysis of executive-legislative relations in the French case or extend findings to semi-presidential systems where presidents cannot habitually rely on majorities in the assembly. Finally, Rose-Ackerman's skilful historical contextualization of formal institutional analysis could provide a promising means to broaden the analysis of semi-parliamentarism.

In sum, each book on its own presents a worthwhile and noteworthy contribution to the comparative study of political executives. At the same time, the works also demonstrate that the discipline remains highly diverse, and scholarship can only benefit if this diversity is truly embraced, and authors and readers recognise the contributions of each tradition, while also considering possible areas of thematic overlap.