THE COMPARATIVE SITUATION OF PRESIDENTS AROUND THE WORLD:

POWERS AND TENURE

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The past couple of decades have seen significant changes to the nature of various presidencies around the world, in particular concerning term length and/or limits — sometimes more restrictive (Finland, France) and sometimes more permissive (various Latin American countries, Russia). Combining the term length and the maximum number of terms yields a combined maximum number of continuous years in office. It is suggested that there is a key breakpoint here at ten years, that is, whether a president (and in particular a non-figurehead president) can serve longer than this. As we shall see, this combination of a relevant president and very long tenure is now overwhelmingly something found just in autocracies.

By definition, presidencies include the notion of a fixed term length. Although not definitional, many also have a maximum number of terms that can be served. In contrast, parliamentary systems do not have fixed terms for the prime minister (as opposed to the parliament) nor a maximum number of terms. (The one exception here is Andorra, where the head of government (Cap de Govern) is limited to two consecutive full terms.) Consequently we can contrast presidential terms and lengths, indeed even for parliamentary systems with a president. This point is also germain for dictators, at least those who seek "confirmation" from the population at regular intervals.

Directly elected presidents are an increasingly common political reality, not just in pure presidential systems but also in parliamentary ones. [Margit Tavits, Presidents With Prime Ministers: Do Direct Elections Matter? (Oxford: Oxford University Press, 2009.) That said, in parliamentary systems presidents may be figureheads (as in Germany), may play a moderate or corrective role (as in many post-communist EU states), or may in fact be the dominant political actor as long as they do not face a hostile legislature and prime minister (as in France). [Alan Siaroff, "Comparative Presidencies: The Inadequacy of the Presidential, Semi-Presidential and Parliamentary Distinction", European Journal of Political Research, Volume 42: 3 (May 2003), pp. 287-312; Alan Siaroff, Comparing Political Regimes: A Thematic Introduction to Comparative Politics, second edition (Toronto: University of Toronto Press, 2009), pp. 154-155.] Generally there has not been a huge amount of recent change in the powers of presidents, but where so has this has generally involved a weakening of presidential power. At the extreme, Finland had a dominant president during the cold war, which was weakened in 1994 to a corrective one with the loss of control over government formation, and then changed to basically a figurehead with its 2000 constitution. In Portugal in 1982, Poland in 1997, and Croatia in 2000, new constitutions changed a dominant president to a corrective one. [In Greece in 1986 constitutional amendments changed a corrective (but unelected) president to a figurehead one.] There only real example of strengthening of presidential powers is in Ukraine, where in 2010 this changed from a corrective to a dominant one - although it is more accurate to say that the Ukrainian president has gone back and forth in this regard over the past couple of decades.

In contrast to these infrequent changes in powers, there have been more frequent occurrences of changes to the number and/or length of presidential terms. In Latin America, where there is a longstanding debate on these matters [John M. Carey, "The Reelection Debate in Latin America", pp. 79-89 in William C. Smith, ed., Latin American Democratic Transformations: Institutions, Actors, and Processes (University of Miami, 2009).], the past couple of

decades have seen many countries (Argentina, Bolivia, Brazil, Colombia, Ecuador, and Peru) change their constitutions to allow presidents to be re-elected to a second term, and in Nicaraqua this was done via a packed court. Indeed, in Colombia President Uribe attempted to effect a further change allowing him a third term, but the referendum to this end was struck down by the Constitutional Court in early 2010. Venezuela in 2009 abolished presidential term limits altogether. These were also abolished in Algeria in 2008 and in Sri Lanka in 2010. In sub-Saharan Africa several countries (Chad, Gabon, Guinea, Togo, and Uganda) have abolished their term limits, thus allowing their longstanding autocrats to remain in power. However, attempts to eliminate term limits failed in Malawi, Nigeria, and Zambia. [Daniel N. Posner and Daniel J. Young, "The Institutionalization of Political Power in Africa", Journal of Democracy, Volume 18: 3 (July 2007), pp. 126-140; Daniel Vencovsky, "Presidential Term Limits in Africa", Conflict Trends, Number 2 (2007), pp. 15-21.] And several African countries have never had term limits. In contrast, in recent decades both Finland and France brought in two-term limits, where none had existed before.

It should be noted that the focus here is on term limits and whether these are observed versus changed or ignored. However, in passing one can note the distinction made by Maltz [Gideon Maltz, "The Case for Presidential Term Limits", Journal of Democracy, Volume 18: 1 (January 2007), pp. 128-142.] between the "hard contravention" of eliminating term limits and the "soft contravention" of increasing the number or length of terms and in particular making the argument (or having the courts rule) that the term limits do not apply fully to oneself since they should only start from the first election after the introduction of these limits (often in a constitution brought in by the leader). This notion that one's first term "does not count" and thus, say, a third term is not really a third term has been made by various autocratic leaders - although at times the voters have not accepted this "logic", defeating the leaders in their attempts for a third (or whatever) term. This happened to President Fujimori in Peru (ultimately) and just happened to President Wade in Senegal. In contrast, President Nujoma of Namibia was elected to a third term, as was President Akayev of Kyrgyzstan (but not to a fourth term). And President Compaoré of Burkina Faso was elected to two more terms, thus he is now in his fourth term despite the two-term limit there. Of course, when the United States introduced a two-term limit in 1947 (ratified in 1951), this did not apply to the then-President (Truman).

In terms of the length of the presidential term, perhaps the

most noted recent change was that of Russia, where under President Medvedev (but now benefiting once-again President Putin) the term length was changed from four to six years. At the time then-Prime Minister Putin supported the change, in part by noting the traditional term lengths in Finland and France. ["Russian MPs back presidency move", BBC News, 14 November 2008.] However, in 2000 France changed from a seven-year presidential term to a five-year one (effective as of 2002) — as Putin was aware, but he emphasized the previous situation. And in 2005 Chile changed from a six-year term to a four year one, although this was in large part to synchronize the presidential and legislative terms. The new presidency of Egypt will also have a four-year term, in contrast to the six year terms before.

Thus there now seems to be a clear (even clearer) distinction of term in office between democratic presidents and autocratic ones. This we shall measure shortly. To repeat, though, this analysis is limited to presidents directly elected by the voters (including those "confirmed" by national referenda). Although many dictators have been or were in power for decades, these are often not elected presidents but rather monarchs or some other permanent title (for Franco this was "Caudillo of Spain"; for Gaddafi this was "Brother Leader" of Libya). Some dictators served long periods as president of their country without even the façade of an election, thus complicating (if not negating) the notion of term length.

In terms of elected presidents (not assuming fair elections, of course, or even elections with more than one candidate) the longest currently-serving one is Teodoro Obiang Nguema Mbasogo of Equitorial Guinea. Obiang was first elected President of Equitorial Guinea in 1982, thus he has now been in elected office for 30 years (he initially became president in 1979 after staging a coup). Paul Biya of Cameroon has also been president since 1982, after a few years as prime minister. He was first elected as such in January 1984, and thus had been directly elected for 28 years. José Eduardo dos Santos has been president of Angola since 1979, but was not directly elected until 1992.

Historically, the longest serving postwar autocratic president was Omar Bongo Ondimba of Gabon, who was President of Gabon for 42 years from 1967 to his death in 2009. However, he became president on the death of the previous president (Bongo was then vice-president) and was not elected himself until 1973. Still,

this involved 36 years as a directly elected president. nuance this, Gabon did not have a multiparty presidential election until 1993; beforehand, Bongo was the only name on the ballot. [Prior to 1993, Gabon could be seen as parallelling the system of Egypt and Syria, in which the president was confirmed in a yes or no public referendum. Hosni Mubarak of Egypt won four of these before Egypt held its first multi-candidate presidential election in 2005 (which Mubarak won of course). Syria, Hafez al-Assad won five such "presidential confirmation" referenda and his son Bashar two.] Gnassingbé Eyadéma was President of Togo from 1967 until his death in 2005, but again did not submit to a direct presidential election until 1979. contrast to these leaders who took their time to get a "mandate", Alfredo Stroessner of Paraguay held a special election in 1954, two months after staging a coup. Reelected no less than seven times, he was himself overthrown in a coup in His 35 years in power were then all as an elected president. Going back further in time, Porfirio Díaz was effectively in control of Mexico for 35 years, including one term when an ally served as president. Fidel Castro served as President of Cuba for 32 years, from 1976 to 2008 (formerly he was Prime Minister), but was not directly elected. So it seems empirically that even if effectively in power for "life", electorally autocratic presidents rarely serve more than 30 years in the position based on direct elections, and empirically never (?) more than 36 years. Based on this reality, a value of 40 will be used as a proxy where there is no consecutive maximum, rather than in theory infinity here - at least for calculating averages.

The Appendix table at the end groups the countries with elected presidencies today into autocracies and democracies, and the latter group into pure presidential systems versus parliamentary systems with an elected president. The key definitional distinction here is that in the latter there is a prime minister separate from the president and accountable to parliament. Thus South Korea is placed in the first group of democracies, since its prime minister is not accountable to parliament. For the 48 current autocracies with an elected president, the average combined maximum term length (that is, the number of terms times the term length) is 20.7 years. This contrasts with an average combined maximum of 9.5 years for the 32 pure presidential democracies and 12.4 years for the 25 parliamentary democracies with elected presidents. These latter values include 40s for the new democracies of the Ivory Coast and Tunisia, which are

still under their old authoritarian constitutions. In any case, there is a clear sense that — unsurprisingly — autocracies allow their presidents to remain in office longer than democracies.

Another way of making this same point is by grouping the combined maximum term lengths into three categories: ten years or less, more than less years but an actual limited amount, and infinity (due to no term limits). For the 48 current autocracies, the respective frequencies here are 22, 8, and 18. For the current pure presidential democracies, the frequencies here are 27, 3, and 2. Thus the overwhelming majority of pure presidential democracies cap individual presidents at 10 years or less of continuous office. For the current parliamentary democracies with elected presidents, the frequencies here are 20, 3, and 2. Thus it seems like these democracies are not as restrictive, and that is true but it is because these include certain countries with figurehead presidencies in terms of the earlier distinction, such as Austria with a six-year renewable presidential term. Removing the figurehead presidents from this category changes the frequencies to 15, 2, and 1 - a similar pattern to the pure presidential democracies.

Yet if we go back in time the patterns are not as clear. Granted, this is somewhat hard to do because many autocracies in earlier times simply did not have presidential elections or referenda on staying in office, however unfree and unfair. That is to say, there were relatively fewer electoral authoritarian regimes a generation ago — as Levitsky and Way note, these have become common only since the end of the cold war, with a parallel decline in military and single party regimes. [Steven Levitsky and Lucan A. Way, Competitive Authoritarianism: Hybrid Regimes After the Cold War (New York: Cambridge University Press, 2010).] And although during the cold war there were longstanding elected autocratic presidents such as Alfredo Stroessner noted earlier, there was also the electoral autocracy of the PRI in Mexico which kept to a strict one-term limit from 1933 onwards (which may well have helped keep it in power for most of the twentieth century).

In terms of democratic regimes, on one level the combined maximum duration of presidents may have seemed shorter before, say, the 1990s because many democracies, especially in Latin America, did not allow for immediate presidential re-election. However, because of modest term lengths in most of Latin America, allowing two consecutive terms here has not produced a major change, that is, they still have basically combined

maximums of 10 years or less. What is more crucial, it should be argued, is the historically greater frequency of democracies with longer combined maximums than this. Two such examples were Sri Lanka (as of its 1978 constitution) and Venezuela (as of its 1999 constitution) — both of which had six year terms for the president, renewable once (for a total of 12 years). Interestingly and perhaps consequentially, in both countries democracy broke down in recent years, and in both the term limits have subsequently (more recently) been completely removed.

Of the once and still democratic regimes, only five have had infinite combined maximums for elected presidents: Finland, France, Iceland, and the United States. In Iceland, though, the president is essentially a figurehead (and the new proposed constitution would bring in a three-term limit here). In Finland, the strong president goes back to independence in 1917, when the right wanted a monarchy or failing this a strong president to balance the left-leaning parliament. The president in fact became even more important in the postwar period as he became the central foreign policy actor during the cold war. However, the very long tenure of president Urho Kekkonen, from 1956 to 1982, led to a backlash as he was perceived as authoritarian. Kekkonen's successor, Mauno Koivisto, was elected in 1982 with a mandate to end such presidential dominance and strengthen parliamentarianism, and there was a broad elite consensus on this shift. Various political changes occurred over the next two decades, ultimately culminating in a new constitution in 2000 with an effectively figurehead president. Along the way, in 1991, the president was limited to two terms. [David Arter, Scandinavian Politics Today (Manchester: Manchester University Press, 1999), p. 237; Tapio Raunio, "The Changing Finnish Democracy: Stronger Parliamentary Accountability, Coalescing Political Parties and Weaker External Constraints", Scandinavian Political Studies, Volume 27: 2 (June 2004), pp. 133-152, 145.] As for France, a seven year presidential term without limits goes back to Third Republic, when conservatives wanted a monarchy. Crucially, though, the president was not directly elected in the Third or Fourth Republics. The Fifth Republic of 1958 would give the president greatly increased powers, but in this vein the real change came in 1962, when Charles de Gaulle was able to call and then win a referendum on direct presidential election. In Duverger's famous phrase, "the constitutional amendment of 1962 gave the president no new powers - but it gave him power" (cited in Peter Morris, French Politics Today (Manchester: Manchester University Press, 1994), p. 28). In April 1973 President Pompidou proposed a reduction in the presidential term

to five years, but nothing came of this. However, after three periods of cohabitation in France (1986 to 1988, 1993 to 1995, and 1997 to 2002), the final one of which lasted for a full parliamentary term, it was felt that the long presidential term and thus its lack of symmetry with the parliamentary term was In the late 1990s cohabitation Prime Minister problematic. Jospin pushed for the reduction in the presidential term to a quinquennium and the holding of the presidential elections just before the legislative ones; [David Scott Bell and Byron Criddle, "Presidentialism Enthroned: The French Presidential and Parliamentary Elections of April-May and June 2007", Parliamentary Affairs, Volume 61: 1 (January 2008), pp. 185-205 (p. 188).] in 2000 a constitutional amendment was approved to this end by a national referendum, along with a two-term limit to bring France in line with the rest of Europe. As a practical reality, no French President had ever served more than two terms anyway, but in François Mitterrand's case that did amount to 14 straight years Whereas in the United States, Franklin D. Roosevelt did win four elections and served for just over twelve years before dying in office. The 22nd amendment of 1951 would thus bring in a firm two-term limit for United States presidents, something which presidents prior to FDR had sometimes scrupulously observed and sometimes tried - unsuccessfully - to challenge. [Michael J. Korzi, Presidential Term Limits in American History: Power, Principles and Politics (College Station: Texas A&M University Press, 2011).]

Thus with Finland now limiting its presidency to 12 consecutive years (in what is now effectively a figurehead position) and France limiting its still dominant presidency to 10 consecutive years, (and the United States with a combined maximum of normally 8, at the extreme 10, years for two generations now,) Cyprus stands out as the one longstanding democracy wherein the president can serve indefinitely. No term limits were put in its Constitution of 1960, with the focus being on inter-communal balance (that is, the vice-president had to be a Turkish Cypriot alongside the Greek Cypriot president, with both the president and vice-president having broad veto powers, and there was a 7:3 Greek to Turkish ratio in the cabinet). However, with the Turkish Cypriot withdrawal from the shared institutions at the end of 1963, all of these checks and balances vanished. president thus became quite unconstrained in her/his broad powers. [James Ker-Lindsay, "Presidential Power and Authority in the Republic of Cyprus", Mediterranean Politics, Volume 11: 1 (March 2006), pp. 21-37.] The independence leader Archbishop Makarios III became Cyprus' first president and would serve 17 years in office, winning three times (the last by acclamation). No other president has served a third term,

although two have run unsuccessfully for such. Cyprus thus stands out as the one exception to what is now a clear democratic versus autocratic divide in terms of long-serving relevant presidents.

## APPENDIX TABLE: CURRENT FEATURES OF PRESIDENTIAL TERMS FOR DIRECTLY-ELECTED PRESIDENTS

Country	length of presidential term (years)	maximum consecutive terms	combined maximum
AUTOCRACIES			
Afghanistan	5	2	10
Algeria	5	unlimited	infinite
Angola	5	2	10
Armenia	5	2	10
Azerbaijan	5	unlimited	infinite
Belarus	5	unlimited	infinite
Burkina Faso	5	2	10
Burundi	5	2	10
Cameroon	7	unlimited	infinite
Central African Republic	5	unlimited	infinite
Chad	7	unlimited	infinite
Congo, DR	5	2	10
Congo, R	7	2	14
Djibouti	6	2	12
Equatorial Guinea	7	unlimited	infinite
Eritrea	5	2	10
Ethiopia	6	2	12
Gabon	7	unlimited	infinite
Gambia	5	unlimited	infinite
Georgia	5	2	10
Guinea	7	unlimited	infinite
Guinea-Bissau	5	2	10
Haiti	5	1	5
Iran (not the most powerful actor)	4	2	8
Kazakhstan	5	2	10

Kenya	5	2	10
Kyrgyzstan ^ (not the most powerful actor)	6	1	6
Madagascar	5	2	10
Malawi	5	2	10
Maldives	5	2	10
Mali	5	2	10
Mauritania	5	2	10
Mozambique	5	2	10
Nicaragua	5	2	10
Russia	6	2	12
Rwanda	7	2	14
Singapore	6	unlimited	infinite
South Sudan	4	unlimited	infinite
Sri Lanka	6	unlimited	infinite
Sudan	5	2	10
Syria	7	2	14
Tajikistan	7	2	14
Tanzania	5	2	10
Togo	5	unlimited	infinite
Turkmenistan	5	2	10
Uganda	5	unlimited	infinite
Uzbekistan	7	2	14
Venezuela	6	unlimited	infinite
Yemen	7	unlimited	infinite
Zimbabwe	6	unlimited	infinite

<sup>^</sup> still assessing regime type

## DEMOCRACIES

## Fully Presidential or Effectively So

Argentina	4	2	8
Benin	5	2	10
Bolivia	4	2	8
Brazil	4	2	8
Chile	4	1	4
Colombia	4	2	8
Comoros	4	1	4
Costa Rica	4	1	4
Cyprus	5	unlimited	infinite
Dominican Republic	4	1	4
Ecuador	4	2	8
El Salvador	5	1	5
Ghana	4	2	8
Guatemala	4	1	4
Honduras	4	1	4

Indonesia	5	2	10
Ivory Coast	5	unlimited	infinite
Liberia	6	2	12
Mexico	6	1	6
Niger	5	2	10
Nigeria	4	2	8
Palau	4	2	8
Panama	5	1	5
Paraguay	5	1	5
Philippines	6	1	6
Senegal	7	2	14
Seychelles	5	3	15
Sierra Leone	5	2	10
South Korea	5	1	5
United States	4	2	8
Uruguay	5	1	5
Zambia	5	2	10
Dealism antone With Elected Descident			
Parliamentary With Elected President			
Austria *	6	2	12
Bulgaria	5	2	10
Cape Verde	5	2	10
Croatia	5	2	10
Finland *	6	2	12
France	5	2	10
Iceland *	4	unlimited	infinite
Ireland	7	2	14
Kiribati	4	3	12
Lithuania	5	2	10
Macedonia	5	2	10
Mongolia	4	2	8
Montenegro *	5	2	10
Namibia	5	2	10
Peru	5	1	5
Poland	5	2	10
Portugal	5	2	10
Romania	5	2	10
Samoa *	5	2	10
Sao Tome and Principe	5	2	10
Serbia *	5	2	10
Slovakia *	5	2	10
Slovenia *	5	2	10
Taiwan	5	2	10
Tunisia	5	unlimited	infinite
Ukraine	5	2	10

<sup>\*</sup> figurehead or effectively figurehead president