

**a comparison of presidential system in russia, u.s. and france**

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Presidential form of government is one of the important forms of democratic government along with the parliamentary system. However, there are different kinds of Presidential systems in various countries depending on the political circumstances in which they emerged. For instance, American presidency is regarded as the oldest and purest form of presidential government [4]. It came into being under different circumstances and situation, while the French presidency is considered by the academicians as semi-presidential because of its peculiar co-existence of the presidency and the cabinet and emerged under circumstances unique to that country [8]. The constitution of the Russian Federation of Dec 12, 1993 was a product of a constitutional melting pot. The drafters attempted to duplicate the American system of checks and balances but ended up with a model which combined both French and American features, but is still uniquely Russian [1].

Comprehending the Russian constitution “in action” especially in its present status it would be pertinent to go by its past and the immediate recurrence of circumstances during its birth [2]. The Russian constitution went through a radical break from its past and overlapped with the certain intricacies between its immediate past and immediate future. The text of the constitution have similarities with some existing models such as the French and American but it does not reproduce any of them completely.

In contrast with the American presidential system the President of Russian Federation has the right of legislative initiative and the right to issue decrees and edicts in the legislature even without the consent of parliament. Also he has a right to dissolve Duma [6]. The power of the Russian federation to appoint and remove Prime minister is controversial with federal structure or parliamentary form of democracy. On the other hand, France and American presidency balance the mutual dependence by interdependence in the context of checks and balances. This sort of interdependence maintains the notion of separation of power, especially for one power being autocratic. To carry on this principle of parliamentary democracy the system needs strong party system. France and America carry the strong party system while in Russia, being presidential-parliamentarism the party system is weak. This weakness leads Russian democracy to the semi-presidentialist criteria.

After 1991 most American observers quickly assumed that Russia was on a path to a Western-style market economy and liberal democracy[7]. They took the Soviet collapse as vindication of Francis Fukuyama’s 1989 essay on “The End of History,”[5] which argued that liberal democracy was now unchallenged as a blueprint for national development and social progress. In the 1990s both the Russian and US governments operated on the shared assumption that Russia was in the process of becoming a democracy, one would take its rightful place among the Western family of nations - a status recognized by Russia’s accession to the G8 group of advanced democratic nations in 1997. Despite these initial hopes, however, Russia’s political trajectory since 1991 has been a grave disappointment to Western observers

The modern French and Russian state are both semi-presidential states. It means that both the countries Russia and France have executive power shared between president and prime minister. This study examines the differences of powers in order to comprehend how they can help in the field of democratic performance. Four political institutions will be examined in each country: presidents, prime ministers, parliaments, and political parties. By comparing these institutions across two semi-presidential states, important differences can be unearthed and their implications for democratic performance analyzed.

On the comparative method, Tocqueville offered this comment: “Without comparisons to make, the mind does not know how to proceed.” It is the methodological core of the humanistic and scientific methods, including the scientific study of politics. The proposed study will deal with three models of presidential system: America - the pure form, France - the mixed form, and Russia - the super-presidential form. It will analyse the historical evolution and the main characteristics of the systems and will make a comparison among the three.

Presidential system of government is characterized by a constitutional and political separation of powers between legislative and executive branch of government [3]. Presidential power much depends on, who the president is. The personality factor and the charismatic factor of leadership and its effect on presidentialism have been less studied. There may be a president who not being aware of his constitutional power can function well. On the other hand the president who is well aware of his constitutional power may make mistake while applying them. This means the presidency and office of the president are the two different premises. Hence the presidential system sometimes is identified with the personality who holds it.

Thus the scope of study is limited to a comparison of the three presidential systems, the circumstances under which they emerged, the power and function of the president in these countries and the impact of these presidential systems on their polities.

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