



Peer-Review Report Form

Manuscript Title:	Impeachment as Constitutional Accountability and Political Instrumentalization: A Comparative Systematic Literature Review
Type of Article:	Review Article

FIRST ROUND

Editor

<u>General Comments and Recommendations</u>
The reviewers acknowledge the significance of your manuscript and recommend several revisions to further improve its clarity, coherence, organization, and overall scholarly quality. In addition, you are advised to thoroughly review and validate all references included in the manuscript. Please ensure that all cited sources are accurate, accessible, and retrievable through Google Scholar to uphold the credibility and reliability of the study. Additionally, make sure to include the DOI or website link for every reference to facilitate verification and accessibility of sources. Furthermore, only sources that are cited within the manuscript should appear in the References section, and all entries listed in the References section must also be cited in the text. For example, if 20 unique sources are cited in the manuscript, then only those 20 sources should be included in the References section. Please note that repeated citations of the same source within the text are counted as a single reference entry; therefore, the total number of references may be lower than the total number of in-text citations.

Reviewer 1

<u>General Comments and Recommendations</u>
You have tackled a massive constitutional topic. The ambition to synthesize 159 studies across four jurisdictions is commendable. However, severe methodological and structural vulnerabilities emerge. A systematic literature review must guarantee reproducibility. Your reliance on a single author for data extraction critically compromises the PRISMA framework you claim to utilize.

<u>Specific Comments and Recommendations</u>
Abstract: The abstract provides a decent overview but lacks methodological precision. You state that PRISMA guided the selection. Yet, you fail to mention the exact databases or the specific years covered. A reader must know the temporal scope immediately.
Introduction: Your conceptual setup is strong. You clearly define the dual nature of the topic. However, your problem statement needs sharper focus. You claim the literature is fragmented, but you do not adequately explain how this specific synthesis resolves that fragmentation beyond mere categorization.



Methodology: You admit in the limitations that a single evaluator handled the selection process. A single evaluator invalidates the core premise of a systematic review. You must introduce a second evaluator or explicitly justify this deviation, though most reputable journals will reject it outright. Table 1 and Figure 2 present inconsistencies. Figure 2 references five Boolean search sets, but Table 1 lacks this exact five part breakdown. Your quality appraisal uses a modified CASP checklist. You must provide robust justification for how you adapted this tool for legal and empirical literature. Furthermore, you retained all 159 studies regardless of their quality score. If low quality studies remain in the synthesis, the appraisal step becomes performative.

Results: Your thematic synthesis is overly broad. Category 4 shifts awkwardly into direct case commentary. A literature synthesis should aggregate what prior authors say about these countries. Instead, your text reads as if you conduct primary political analysis on recent events, such as the 2025 Duterte case. You must anchor every claim in Category 4 strictly to the synthesized literature, not to your own independent political observations.

Discussion and Model: The proposed continuum is conceptually attractive but analytically elementary. You map extreme poles, which is evident, but the true scholarly value lies in the 'Contested Zone'. Your model does not adequately operationalize how an analyst can measure the shift from one pole to another. You need precise indicators for the structural drivers.

Conclusion and Limitations: Your conclusion summarizes the paper well. However, the admission of a single evaluator approach is buried in the limitations. You must either rectify this methodological gap before submission or reframe the entire manuscript as an exploratory review rather than a strict PRISMA systematic review.

Please indicate your recommendation by checking the appropriate box below.

<u>Decision</u>	
	Accept the manuscript for publication.
/	Reconsider the manuscript after the authors have satisfactorily addressed and complied with the reviewers' comments and recommendations.
	Reject the manuscript, as it is not suitable for publication.

Reviewer 2

<u>General Comments and Recommendations</u>
For me, the problem is not mainly presentation anymore, but whether the four countries are really comparable under the same concept of "impeachment," and whether the conclusions actually come from the 159 studies in a transparent way. Some claims are much stronger than what the evidence shown in the manuscript can support.
<u>Specific Comments and Recommendations</u>
The most serious issue for me is the comparability of the four jurisdictions. The manuscript says the review concerns impeachment, but the actual object being compared is changing from one country to another. For the Philippines and United States, the analysis mainly concerns formal constitutional impeachment. For France and Italy, however, the discussion moves to criminal prosecution, parliamentary responsibility, confidence mechanisms, coalition turnover, and other forms of accountability. The eligibility criteria itself says that studies exclusively dealing



with non-impeachment removal mechanisms should be excluded unless they have direct comparative relevance. Yet Sarkozy's criminal conviction and Berlusconi's criminal proceedings become important evidence for the French and Italian cases. This creates a serious construct validity problem. The authors must decide what is really being reviewed: impeachment, or the broader system of constitutional/political accountability of high public officials. If the second is intended, then the title, questions, eligibility criteria, synthesis, and proposed framework all need to be reconstructed around that broader concept.

The comparative conclusions are much stronger than the comparative evidence base. Around 105 of the 159 studies are U.S.-based, around 22 concern the Philippines, around 20 are comparative, while only around 12 concern France and Italy individually or in combination. This means about two-thirds of the evidence comes from only one country. But later the manuscript gives rather equal and confident conclusions for all four systems, such as strong safeguards in the United States, accountability displacement in France, elite coalition capture in the Philippines, and legally diffuse accountability in Italy. I do not think these four national conclusions presently have equivalent evidentiary strength. The authors need to show clearly how many studies actually support each country-level inference and should not present thinly represented jurisdictions with the same level of certainty as the United States.

There appears to be a circularity between what the review assumes and what it later claims to discover. From the beginning, the objectives already frame impeachment as constitutional accountability versus political instrumentalization. The eligibility framework then specifically includes studies conceptualizing impeachment as accountability, instrumentalization, or a contested hybrid, and even establishes accountability-oriented versus politically instrumentalized impeachment as the comparator. Later, the synthesis codes studies under almost the same dimensions and concludes that impeachment has these same functions. Therefore, I am not fully convinced that these categories genuinely emerged from the evidence. They may partly be products of the authors' pre-established framework. The authors should clearly identify which codes were deductive and which were inductively developed, and they should actively report evidence that did not fit the accountability/instrumentalization framework. Otherwise there is high risk of confirmation bias.

I cannot adequately audit how the 159 studies produced the reported themes. Table 3 is explicitly only a representative selection, while the manuscript says that the full extraction matrix is in Supplementary Table S1. The methods similarly state that all 159 studies were coded and that the complete extraction matrix is supplementary. However, from the manuscript provided to me, the thematic results mostly cite selected studies without showing how many studies contributed to each theme, whether studies disagreed, or whether a conclusion came mainly from one jurisdiction. Also, the bibliography in the manuscript appears far smaller than the claimed 159 included studies. Unless the complete study list and supplementary materials were separately submitted to the journal, this is a serious evidence-traceability problem. Every included study should be auditable, and I strongly suggest a study-by-theme or evidence matrix showing jurisdiction, design, quality, finding direction, and theme contribution.

The very wide historical period is treated as if impeachment scholarship and constitutional conditions were temporally stable. The included studies range from 1913 to 2025. This is more than one century, during which party systems, constitutions, media systems, judicial roles, democratic institutions, and impeachment practices changed considerably. Yet the synthesis frequently says that "the literature consistently shows" or presents one general pattern without separating historical periods. A finding from early twentieth-century American judicial impeachment should not automatically carry the same analytical meaning as a finding concerning Trump-era digital polarization or post-1987 Philippine impeachment. At minimum,



the authors need temporal stratification or sensitivity analysis. Otherwise historical heterogeneity is being converted into apparent theoretical consistency.

Many conclusions are written in causal and prescriptive language that the review design cannot establish. For example, the discussion states that several conditions “must operate together” to produce genuine accountability, and the conclusion goes further by saying that the three IFC drivers “must be aligned” for impeachment to fulfill its constitutional role. These are very strong causal propositions. An integrative thematic synthesis of heterogeneous doctrinal, qualitative, comparative, and quantitative literature cannot by itself demonstrate necessity or causation. The same concern applies when the manuscript prescribes particular institutional “remedies.” The authors either need a much more rigorous causal-comparative evidentiary basis, or they should revise these statements as propositions or hypotheses generated from the synthesis, not conclusions already demonstrated by it.

The legal sourcing requires a much more serious jurisdiction-by-jurisdiction audit. One example is already enough to create concern: the manuscript explains the Philippine 1987 Constitution's House and Senate impeachment thresholds but cites Holtzman (2008) for this proposition. The reference listed for Holtzman is Abuses of presidential power: Impeachment as a remedy in the University of Miami Law Review. This does not appear to be the proper authority for stating the Philippine constitutional procedure. In a comparative constitutional review, basic legal propositions should come first from the constitution, statutes, rules, court decisions, or authoritative jurisdiction-specific scholarship. I strongly suggest checking every country-specific legal claim against primary legal authority. If this citation problem occurs repeatedly, then confidence in the entire comparative legal synthesis becomes difficult to maintain.

Please indicate your recommendation by checking the appropriate box below.

<u>Decision</u>	
	Accept the manuscript for publication.
/	Reconsider the manuscript after the authors have satisfactorily addressed and complied with the reviewers' comments and recommendations.
	Reject the manuscript, as it is not suitable for publication.

SECOND ROUND

<u>Decision</u>	<u>Editor</u>	<u>Reviewer</u> <u>1</u>	<u>Reviewer</u> <u>2</u>
Accept the manuscript for publication.	/	/	/
Reconsider the manuscript after the authors have satisfactorily addressed and complied with the reviewers' comments and recommendations.			
Reject the manuscript, as it is not suitable for publication.			