

## **HYBRID ADMINISTRATIVE TRADITIONS IN MACAO SAR: BETWEEN NAPOLEONIC AND CHINESE ADMINISTRATIVE TRADITIONS**

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### **Abstract**

Macao is a Special Administrative Region of the People's Republic of China, governed by the principle of 'One Country, Two Systems'. With a Portuguese historical legacy lasting more than 400 years, which continued until December 1999, we consider that the Region has a very particular model of public administration and is undergoing a gradual process of administrative reform, which is the subject of this article. Its public administration is not limited to a linear continuation of the Portuguese period, nor is it a simple transposition of the administrative model of the People's Republic of China; rather, it is a hybrid configuration, in which the Napoleonic legacy (of Portuguese origin) provides a resilient legal-administrative support, recontextualized by a post-1999 political-administrative logic associated with the Chinese administrative tradition (of Confucian origin). The results point to a configuration in which the legal and administrative support remains predominantly Napoleonic (legalism, uniformity, legal and administrative control mechanisms), while the political logic shows Confucian traits (centrality of the executive, vertical accountability and primacy of stability). We conclude that Macao exhibits a relatively stable hybrid model, resulting from the coexistence and



recombination of distinct (but also similar) administrative traditions, with incremental adaptations that preserve the inherited legalistic basis and simultaneously reinforce political coordination mechanisms typical of the Chinese context.

### Keywords

Administrative traditions, Macao SAR, One Country, Two Systems, Napoleonic and Chinese tradition.

### Resumo

Macau é uma Região Administrativa Especial da República Popular da China, regida pelo princípio de “Um País, Dois Sistemas”. Com um legado histórico português com mais de quatro séculos, que perdurou até dezembro de 1999, consideramos que a Região apresenta um modelo de administração pública particularmente singular e atualmente em processo gradual de reforma administrativa — objeto central deste estudo. A sua administração pública não constitui uma mera continuidade linear do período português, nem resulta de uma simples transposição do modelo administrativo da República Popular da China; trata-se, antes, de uma configuração híbrida, em que o legado napoleónico (de matriz portuguesa) fornece um suporte jurídico-administrativo resiliente, recontextualizado por uma lógica político-administrativos pós-1999 associada à tradição administrativa chinesa (de origem confuciana). Os resultados apontam para uma configuração na qual o enquadramento jurídico-administrativo permanece predominantemente napoleónico (legalismo, uniformidade, mecanismos de controlo jurídico e administrativo), enquanto a lógica política revela traços confucianos (centralidade do executivo, responsabilização vertical e primazia da estabilidade). Concluímos que Macau apresenta um modelo híbrido relativamente estável, resultante da coexistência e recombinação de tradições administrativas distintas - embora também similares - com adaptações incrementais que preservam a base legalista herdada e, simultaneamente, reforçam mecanismos de coordenação política típicos do contexto chinês.

### Palavras-chave

Tradições administrativas, RAEM de Macau, Um País, Dois Sistemas, Tradição napoleónica e chinesa.

### How to cite this article

Faria, João Carlos Cortesão & Santiago, Anabela Rodrigues (2026). Hybrid Administrative Traditions in Macao SAR: Between Napoleonic and Chinese Administrative Traditions. *Janus.net, e-journal of international relations*. Thematic Dossier - Portugal and China in International Relations: Historical Legacies and Contemporary Dynamics, VOL. 16, Nº. 2, TD2, February 2026, pp. 32-54. <https://doi.org/10.26619/1647-7251.DT0126.2>

**Article submitted on 3<sup>rd</sup> November 2025 and accepted for publication on 12<sup>th</sup> January 2026.**





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### **1. Introduction**

In recent decades, public administration reforms have established themselves as key instruments for modernizing the state, with a view to improving the efficiency, effectiveness, transparency, integrity and quality of public services. In this context, the Macao Special Administrative Region (MSAR) is particularly relevant: the transfer of administration to China (20 December 1999), negotiated following the Sino-Portuguese Joint Declaration (1987), presented the MSAR with the challenge of preserving institutional continuity and stability, while adjusting structures, practices and public policies to the new political and socio-economic conditions.

The singularity of Macao's public administration results from an unusual historical and institutional overlap. On the one hand, over centuries, the region consolidated an administrative model associated with the Napoleonic tradition, characterized by legalism, procedural formalism, centralization and a legal-administrative regime. On the other hand, the post-1999 period has intensified the influence of the Chinese administrative tradition, marked by a strong primacy of executive power, hierarchy and state-centric coordination, with a political-administrative relationship that is often more fused than separate. Comparatively speaking, the case of Macao suggests that the "hybridity" in SARs should be specified by the traditions in interaction. Unlike Hong Kong – often read as a hybrid dynamic between Anglo-Saxon administrative institutions and Chinese governance – in Macao, hybridity results from the combination of a Napoleonic legal-administrative legacy and Chinese mechanisms of political-administrative coordination.

This study therefore has the following main objective: to understand how Napoleonic and Chinese traditions have conditioned and shaped this process, contributing to the contemporary configuration of a hybrid model of public governance in the MSAR. The research question focuses on: how do Napoleonic and Chinese traditions influence Macao's public administration, making it a hybrid case?

The results show that Napoleonic and Chinese administrative traditions influence administrative reform in Macao not as parallel legacies, but as interacting mechanisms. The Napoleonic legacy provides a resilient legal-administrative infrastructure – legalism,



uniformity, procedural predictability and strong legal scrutiny – through which reform tends to advance incrementally and stabilize institutionally. At the same time, post-1999 political and administrative logics have reconfigured the exercise of authority and the way accountability is organised: the centrality of the executive, the fusion of politics and administration, and a predominantly vertical chain of accountability structure the conduct of reform, leadership control, and administrative coordination. The result is a relatively stable hybrid configuration, in which legal continuity sustains capacity and predictability, while vertical coordination conditions priorities, elite control, and practical limits on participation and democratic accountability.

## **2. Administrative Traditions: Concept and Administrative Hybridity, Dimensions**

For Peters (2008), an administrative tradition can be understood as “an historically based set of values, structures and relationships with other institutions that defines the nature of appropriate public administration within society” (p. 118). Administrative traditions have roots that go back centuries and continue to influence current administrative behavior. It is important to note that, although rooted in the past, administrative traditions are not static (Peters, 2021). They interact with new ideas, constraints and political dynamics, producing patterns of change over time (Painter & Peters, 2010b).

Peters (2021) argues that, despite their historical origins, traditions have contemporary relevance and continue to influence the patterns of public bureaucracies. As Painter and Peters (2010a) and Peters (2021) point out, administrative traditions impose paths of development (path dependence) that explain why different countries, subject to similar international pressures for reforms inspired by management models, follow different reform trajectories conditioned by their institutionalized legacies.

In the field of comparative public administration science, several authors have identified families of countries that share similar administrative traditions due to common historical and cultural experiences (Heady, 2011; Kuhlmann et al., 2025; Painter & Peters, 2010a). Painter and Peters (2010b), for example, classified national bureaucracies into four major families: Anglo-Saxon, Napoleonic (or continental European), Germanic, and Nordic (Scandinavian), to which they add the administrative traditions of post-colonial Latin America, South Asia, and Africa, East Asia, the Soviet Union, and the Islamic world.

Recent literature recognizes that classic “families” of administrative traditions do not always accurately capture the empirical diversity of administrative systems. In Jugl’s (2025) study, administrative traditions are reconceptualized and measured in two dimensions – citizen orientation and structural concentration –, which appear to be largely independent, allowing for empirical observation of multiple combinations of characteristics and relevant variation within the supposed families. Despite this, the author shows that much of the literature continues to operationalize administrative traditions through categorical classifications (“families”), often with little empirical transparency, which limits systematic comparison and the identification of more nuanced patterns.



In theoretical terms, a hybrid administrative tradition describes an administrative system that combines elements from different families or historical-administrative legacies. Jugl (2025) observes that administrative traditions often exhibit a hybrid nature and openness to exogenous ideas. In fact, the literature on public administration recognizes that:

*Traditions are likely to be hybrid and more complex than what is suggested by the AT families and the previous focus on paradigmatic cases; and while hybridity is acknowledged in the theoretical discussion on AT (...) it has hardly been studied empirically in comparative public administration (Jugl, 2025, pp. 13–14).*

Precisely because hybridity refers to variable combinations of attributes – and not just to belonging to a “family” – it becomes analytically useful to break down administrative tradition into dimensions. In *Tradition and Public Administration* (2010a), Painter and Peters propose a comparative framework to clarify the concept of administrative traditions, operationalizing it through four analytical dimensions: (i) State and Society; (ii) Law vs. Management; (iii) Administration and Politics; and (iv) Accountability.

The first dimension (State and Society) encompasses both the conceptualization of the State (whether understood as an organic entity or as a contractual construct) and the role it assumes in relation to society and the economy. This includes contrasting models such as a centralized and interventionist State versus a limited State oriented toward safeguarding market guarantees. Traditionally, comparative analyses have highlighted, for instance, the organic conception of the State prevalent in continental traditions, where the State is regarded as the embodiment of the common good and vested with legitimate authority to shape societal structures. This stands in sharp contrast to the more contractual perspective characteristic of Anglo-Saxon traditions, in which the State is conceived as the outcome of a social agreement, with functions narrowly defined and constrained by societal consent.

This dimension is critical because it reflects foundational assumptions about sovereignty, legitimacy, and the scope of governmental authority. The organic view, rooted in continental European thought, tends to emphasize hierarchical integration and normative unity, positioning the State as a moral and political agent responsible for articulating collective interests and ensuring social cohesion. Conversely, the contractual paradigm, deeply embedded in liberal Anglo-American traditions, prioritizes individual autonomy and market mechanisms, framing the State as a neutral arbiter whose legitimacy derives from consent rather than transcendental notions of the common good. These divergent conceptions have profound implications for administrative design, policy-making, and the balance between regulation and freedom, shaping not only institutional architectures but also the normative expectations of governance within different cultural and historical contexts.

The second dimension (Law vs. Management) lies in the role conception of the administrative systems: the juridical administrator who applies codified law with procedural correctness (strong in Napoleonic/Germanic traditions) versus the managerial administrator who prioritizes results, efficiency, and organizational performance (strong



in Anglo-American traditions). This dimension is particularly significant because it reveals the normative foundations and operational priorities of administrative systems. A legalistic orientation, deeply rooted in continental European and Napoleonic traditions, emphasizes procedural correctness, predictability, and the supremacy of law as a safeguard of legitimacy and equality before the State. In such systems, administrative discretion is minimized, and compliance with codified norms is considered the cornerstone of public integrity. Conversely, managerial approaches, inspired by Anglo-American pragmatism and reinforced by the doctrines of NPM, privilege outcomes over processes, advocating for flexibility, innovation, and performance metrics as drivers of administrative effectiveness (Painter & Peters, 2010a; Peters, 2021). This shift from rule-bound administration to results-oriented governance reflects broader transformations in public sector paradigms, including the diffusion of private-sector management techniques and the growing emphasis on accountability through measurable outputs rather than formal adherence to legal norms. The tension between these two orientations continues to shape contemporary debates on administrative reform, efficiency, and democratic legitimacy (Painter & Peters, 2010a; Peters, 2021).

The dimension of "Administration and Politics" addresses the degree of politicization within the civil service and the structural relationship between political and administrative spheres. It asks to what extent political actors (such as elected officials and parties) shape the internal functioning of public administration, particularly regarding appointments, career progression, and bureaucratic decision-making. As Peters (2021) emphasizes, this dimension is crucial for distinguishing administrative traditions. In contractarian systems, such as those within the Anglo-American tradition, the normative ideal is a clear separation between politics and administration, grounded in principles of neutrality, merit, and permanence. The British civil service model exemplifies this approach, conceiving the bureaucracy as an instrument of law rather than an extension of partisan authority. Conversely, organic conceptions of the State, typical of Napoleonic or patrimonial traditions, foster more permeable boundaries between politics and administration. In these contexts, political control over the bureaucracy is often institutionalized through patronage or systems such as the spoils system, historically prevalent in the United States (Painter & Peters, 2010a; Peters, 2021). This dimension also reflects contemporary tensions. Reforms inspired by NPM have introduced performance-based accountability and contractual appointments, challenging the traditional separation of roles. However, historical institutionalist perspectives underscore the resilience of inherited patterns: administrative traditions act as "default options," shaping the trajectory and interpretation of reforms.

Finally, "Accountability" reflects how the bureaucracy is held responsible for its actions and decisions. Mechanisms of accountability vary across administrative traditions and can be broadly categorized into legal/formal controls and political/public controls. Legalistic approaches emphasize compliance with codified norms and hierarchical supervision, enforced through instruments such as administrative courts, audit courts, inspectorates, and internal procedural rules. In contrast, political and societal mechanisms rely on parliamentary oversight, media scrutiny, and civil society



engagement, prioritizing transparency and responsiveness (Painter & Peters, 2010a; Peters, 2021).

As developed by the same authors, further distinction concerns the timing of accountability:

- *Ex ante* accountability involves preventive measures, such as prior authorization or legal review before administrative action (e.g., the role of the Conseil d'État in Napoleonic systems).
- *Ex post* accountability occurs after decisions are implemented, through audits, judicial review, parliamentary inquiries, or electoral processes.

This dimension is critical for understanding variations in governance, as it shapes the incentives and behaviour of public officials, influences administrative culture, and determines the degree of openness and trust between State and Society.

These four dimensions proposed in 2010 provided an initial analytical framework for comparing and contrasting administrative families. However, subsequent research has broadened this set of attributes to capture additional relevant characteristics. In his most recent work, *Administrative Traditions: Understanding the Roots of Contemporary Administrative Behavior* (Peters, 2021), the author retained the original axes while incorporating further elements to offer a more comprehensive view of administrative traditions.

Among the additions, four dimensions stand out.

The fifth dimension concerns the orientation of public administration toward authority versus service to citizens. This attribute, referred to by Peters as the "Administration versus Service" dimension, examines whether public officials primarily conceive of themselves as executors of laws and programs defined by political leaders (the classical administrative function) or as service providers oriented toward meeting the needs and expectations of citizens as "clients" of public services. This dimension, introduced in Peters' 2021 book, reflects the influence of recent paradigms such as citizen-oriented management and the concept of public service motivation, even though it remains relatively underexplored in the literature. It signals a normative shift from a state-centric, rule-bound conception of administration toward models emphasizing responsiveness, co-production, and user satisfaction. These developments challenge traditional bureaucratic identities and raise governance-related questions about the balance between legality, efficiency, and democratic legitimacy.

The sixth dimension is "The Career". This dimension refers to the extent to which public employment constitutes a distinct civil service career, clearly differentiated from political careers and private-sector employment, and to whether officials tend (or not) to remain in government for most of their working lives.

The seventh dimension is "State and Society II" that is, the legitimate role played by societal actors (e.g., interest groups, experts, and citizens) in shaping public policy, both in its formulation and implementation.



The eighth and final dimension is “Uniformity”. Uniformity refers to the extent to which the State can ensure that public administration applies policies and procedures in a similar way across the entire territory, limiting variation between services and regions.

### 3. Napoleonic and Chinese Administrative Tradition

In the case of the Macao Special Administrative Region, for example, we consider the coexistence between the Napoleonic administrative tradition (as Macao was a territory under Portuguese administration for more than four centuries) and the Chinese administrative tradition (with origins dating back to the Qin dynasty) explains not only how changes were implemented, but also the resistance and adaptations that occurred over time – allowing us to analyze the case of the Macao Special Administrative Region as a cluster of the coexistence of two administrative traditions.

Table 1 summarizes the similarities and differences between the Napoleonic and Asian (Confucian, which was largely influenced by China) administrative traditions. This allows us to illustrate how the overlap of these two administrative traditions – the European legal and organizational structure and the values and mechanisms of Chinese administration – manifests itself in the administrative practice of the Macao Special Administrative Region<sup>1</sup>.

<b>Table 1 - Napoleonic and Asian (Confucian) Traditions</b>		
State tradition	Napoleonic	Asian (Confucian)
Law vs. management	Organic	Organic
Administration and politics	Law	Mixed
Administration or service	Fused	Fused
State and society II	Administration	Administration
Uniformity	Mixed	Pluralist/illegitimate
Accountability	Uniform	Uniform

Source: Authors based on Peters (2021, p. 162)

#### 3.1 Napoleonic Administrative Tradition

Our analysis refers to the Napoleonic model, developed in France in the 18th and 19th centuries, which influenced southern European countries such as Portugal, Spain, Italy, and Greece (Painter & Peters, 2010a). This model reflects the influence of the Enlightenment, especially Rousseau's theory of democracy and Montesquieu's separation of powers (Ziller, 2003). In these systems, the law serves as a tool of the State to organize and control society, not just to resolve conflicts between individuals. Public administration is heavily regulated by a legal hierarchy that includes the Constitution, laws, regulations, and other norms, which consequently exercise strict control over what civil servants can do, through specialized courts (Painter & Peters, 2010a; B. G. Peters, 2008).

<sup>1</sup> Our analysis didn't include the element “career”.



The French State is centralized and technocratic, playing an important role in nation-building. Senior positions in public administration are held by an administrative elite who were educated at prestigious schools. These officials often transition from public service to political office seamlessly, as their roles are clearly defined by law. In southern European countries, there is a great deal of legal formalism, or many rules and procedures. However, in practice, informal arrangements are often used to achieve objectives. This encourages clientelism, patronage, nepotism, and sometimes corruption. Additionally, appointments are highly politicized, and many public positions are used as political favors. This contributes to an excess of civil servants and a less professional and less efficient administration (Painter & Peters, 2010a; B. G. Peters, 2008).

Thus, the Napoleonic administrative tradition is characterized by an organic conception of the State, in which the State is invested with legitimate power to exercise authority over society. It is also characterized by a highly centralized and hierarchical state structure with little room for interest groups to intervene in the public policy-making process. This intervention is even seen as illegitimate. Additionally, it is a tradition marked by the primacy of formalism and legalism, or the principle of legality, which shapes administrative action around legal norms (Painter & Peters, 2010b; Peters, 2008).

### **3.2 Chinese Administrative Tradition**

China has the oldest and most deeply rooted administrative system in the world. Its origins date back to the Qin dynasty (221–206 BC) through a highly bureaucratic system that is considered one of the most enduring elements of Chinese civilization (Dwivedi, 2003). The Chinese administrative tradition reflects a long history of centralization and hierarchical control, shaped by cultural values and philosophies rooted in Confucianism and legalism (Dong et al., 2010; Dwivedi, 2003).

Painter e Peters (2010b) argue that the Confucian administrative tradition combines philosophical ideas with practices of the Chinese empire, and it is possible to verify that the Confucian administrative tradition (principles of virtue, meritocracy, rituals, and reciprocity) is, for Painter and Peters (2010b), the ideological matrix that gave rise to the Chinese administrative tradition. Although the Chinese administrative tradition has undergone numerous “reinterpretations” (Yuan, Ming, Qing, Republic, Maoism), Cheung (2010b) notes that the Confucian core has persisted in people's mindsets.

The Confucian administrative tradition combines philosophical ideas with Chinese imperial practices. During the Han era, scholars began to integrate into the State as mandarins, linking the central government to local authorities. In Confucianism, ritual and reciprocity-maintained order better than laws. Relying on virtuous men could lead to favoritism, but meritocracy prevailed: scholars were recruited through imperial examinations, assessing literacy and knowledge of the classics. Despite this, examinations could fail or be corrupted (Painter & Peters, 2010a). Despite the destruction of imperial institutions by the republican revolution and the communist regime, the Confucian core – especially moral leadership, hierarchical relationships, and the ruler's obligation to cultivate virtue – remained in the mindsets of Chinese cadres. Even in Mao's



restructuring, cadres were evaluated for their moral integrity and paternalistic style. It was only after the reforms of the late 1970s that these values came to be presented as “socialist virtues,” but their impact on administrative culture remained unquestionable.

The influence of continental Europe on Chinese administration became particularly visible from the late 19th century onwards, when the need to modernize the State was recognized (Cheung, 2010). Inspired by French legal codes and the Prussian bureaucratic model, Chinese reformers adapted principles such as the uniform codification of laws and the creation of ministries organized by function (Painter & Peters, 2010b). Thus, a continental-style legal system was introduced that coexisted with the Confucian tradition of hierarchy and meritocracy (Peters, 2021) which we can analyse in Table 2.

<b>Table 2 – Asian traditions (Confucian), European Transplants</b>	
<b>Transplant</b>	<b>Confucian</b>
Continental Europe	Japan, Korea, Taiwan, China, Vietnam [to this set we add Macao]
Anglo-American	Hong Kong, Singapore
Source: Authors based on Peters (2010b), p. 26)	

China's administrative tradition continues to evolve, especially in the context of reforms that began at the end of the 20th century. These reforms maintain centralization and hierarchical principles as basic foundations while incorporating modernization and anti-corruption mechanisms. The goal is to strengthen ethics in public services and increase the efficiency of public administration (Alsancak et al., 2022; Cheung, 2010; Dong et al., 2010).

#### 4. Methodology

The research is based on a qualitative design, structured as a case study of the Macao SAR, understood as an institutional configuration where elements of the Napoleonic administrative tradition (legacy of Portuguese administration) and the Chinese administrative tradition (of Confucian origin) coexist and combine.

Specifically, the analysis is organized according to the seven dimensions we identified in the literature, allowing us to observe whether the MSAR is closer to a Napoleonic model, a Confucian model, or a combination of the two. The grid is applied to the following dimensions: (i) State–society I; (ii) law vs. management; (iii) administration and politics; (iv) administration vs. service; (v) State–society II; (vi) uniformity; and (vii) accountability<sup>2</sup>.

The evidence strategy is predominantly documental and bibliographical, combining: (a) academic literature on administrative traditions and administrative reforms; (b) legal-institutional and governance references relevant to the political-administrative design of

<sup>2</sup> In our analysis, we chose to exclude the dimension “The Career”, since, in Peters’ original framework (2021), this dimension is not used in the comparison of European and Asian administrative traditions (see p. 162).



the MSAR; and (c) secondary information supporting the bibliographical references. This triple approach allows us to sustain a dimensional reading without relying on a single source or a single type of evidence.

The point is, hybridity shouldn't be seen as a static mix of "Portuguese" and "Chinese" traits. Administrative traditions have historical roots, but remain open to recombination under new political constraints and under the influence of ideas of modernization; therefore, the decisive point is to understand how competing logics are activated, reconciled or hierarchized in different arenas of governance. Based on this premise, we treat Macao's hybridity as an empirical question: across the seven dimensions, we identify observable indicators associated with Napoleonic legalism and Chinese political-administrative coordination, examining how their interaction shapes path dependence in the MSAR.

Finally, it is important to highlight a methodological limitation: as this is primarily a documental and conceptual analysis, the study focuses on characterizing the model and its logic, and could be further developed in subsequent works using additional methods (e.g. interviews with managers and technicians, observation of implementation, analysis of administrative processes) to test in greater detail how hybridity translates into administrative routines and concrete public policy outcomes.

## 5. Discussion and results

Based on the theoretical framework and the data collected, the assumptions that Macao harbours characteristics from two major administrative traditions – Napoleonic and Confucian (Chinese) – resulting in a hybrid model are confirmed. In this section, we discuss the dimensional results of the analysis, examining each of the seven dimensions in the context of Macao, in light of administrative traditions. In each dimension, we identify the aspects that correspond to the Portuguese/Napoleonic legacy, those that reflect Chinese/Confucian influence, and how the interaction between the two shapes the current policies and administration of the MSAR.

Aspect	Macao as hybrid configuration tradition	Justification
State tradition	Organic	Strong executive; priority given to stability/order ("One Country, Two Systems" with central oversight).
Law vs. management	Mixed elements law	Rule-based culture; incremental modernisation (simplification, e-government, performance management).
Administration and politics	Fused	Appointments and control of senior management by the Chief Executive; criteria of trust/political loyalty.



Administration and service	Administration with service elements	"Serving the people" and improvements in service (one-stop, quality letters), but formalistic/bureaucratic routines persist.
State and society II	Mixed, tending to limited	Many advisory councils and dense associations, but with a government agenda and limited autonomy (risk of formal consulting).
Uniformity	Uniform	Small region; lack of autonomous local power; common procedures/statutes (uniformity "from within").
Accountability	Predominantly legal with mixed elements	Predominance of legal and ex post control: courts (including Administrative Court) + CACC + Audit Commission; more limited political-democratic scrutiny.
Source: Authors <sup>3</sup>		

### 5.1 State and Society - I

According to Yee (2001), the transition and institutional design of the MSAR are based on a strongly state-centric model of governance: the process is led by Beijing in cooperation with pro-China economic and associative elites, while the population remains largely in a political culture of "subjects", valuing stability, order and government leadership. This combination of a strong executive, elite consensus and paternalism reinforces the idea of a Special Administrative Region that combines Napoleonic centralist organicism with the Chinese administrative tradition of benevolent authority (Castellucci, 2012). Indicators of this are evident in multiple aspects.

Constitutionally, the Basic Law of Macao confers significant powers on the Chief Executive, a single-person body that accumulates the functions of head of government and concentrates executive power. The Chief Executive is not elected by universal suffrage, but chosen and appointed by the Central People's Government of China (Gouveia, 2012). The legitimacy of the Macao SAR government does not come from universal suffrage, but from a process defined by the central authority (Beijing), reinforcing the notion of a tutelary State: ultimately, it is the Chinese State that delegates authority to the Macao government (Gouveia, 2012). However, within Macao, this authority is exercised in a Napoleonic manner and centralized (Chou, 2004; Peters, 2021).

Another indicator of the organic and centralizing character of the Macao Region is the absence of significant challenges to its authority or movements that question the prominent role of the government. Research indicates that, even after the transition, Macao's civil society remained relatively weak and submissive, with high levels of trust or, at least, passive acceptance of authority on the part of citizens (Ho, 2015; Kwong, 2011). As Choi (2011) points out, relations between Macao and the Central Government have been marked by cooperation, but it is clear that the national interests defined by

<sup>3</sup> The authors present the results based on Table 1, structured according to the analytical dimensions proposed by Peters (2021).



Beijing take precedence in the strategic guidelines of the Macao SAR. This means that Macao is part of a framework of sovereignty in which the State (in this case, the Chinese State through its local representative) retains the right and duty to govern the territory according to broader national objectives, which take precedence over local requests. There was therefore no contractualist or liberal reorientation of the Region after 1999; on the contrary, Macao's autonomy was designed to strengthen national unity and the stability of the Chinese State.

Understanding (the organic nature of the State) as an entity with its own will and interests, above particular groups, is also evident in official discourse that justifies reforms or policies by appealing to the global public interest. The 2025 Government Action Lines, for example, mention goals such as "raising governance capacity" and "strengthening awareness of the big picture" among civil servants, which suggests that they are expected to think of the administration as a whole serving the common good, rather than segmented by sectoral interests. This rhetoric echoes the French tradition of service to the *intérêt général* (Chevallier, 1975), with the difference that in Macao such general interest is also aligned with the strategic guidelines defined by Beijing (e.g., economic diversification, social stability, patriotism).

## 5.2 Law vs. Management

Macao's administrative structure preserves a strong legal tradition, inherited from the Napoleonic model (based on its Roman-Germanic roots), where legality is central to administrative action. This legal tradition is evident in the maintenance of the administrative law system, the hierarchical administrative organization and the supremacy of written law (Godinho, 2016; Xinyu, 2016).

Under Portuguese administration, Macao operated under a legal system based on the European continental model – the Administrative Code (Torrão, 2016), the Penal Code, the Civil Code, the Commercial Code, laws and regulations (Mendes, 2013) – and the local bureaucracy was accustomed to formal procedures, paperwork and strict compliance with legal regulations (Bolong, 2011).

With the transition to China approaching, the need to modernize administration by incorporating public management concepts was identified (Lam, 2011). Not coincidentally, this period coincided globally with the spread of New Public Management (NPM) (Bouckaert & Pollitt, 2011). Thus, as early as the 1990s, and intensifying after 1999, the case of Macao revealed a path of balance between the legalistic heritage of the Portuguese system and international pressures to adopt modern management practices after the transition period (Kei, 2005; Lam, 2011).

As described by Yu (2011), Edmund Ho's government (1999-2009) introduced competitive recruitment systems and periodic performance evaluations, in addition to investing in professional training for civil servants, measures characteristic of a managerial approach aimed at improving the quality of public service. These reforms denote the incorporation of NPM principles – meritocracy, performance-based human resource management, management skills development – signaling a shift from purely



legal-bureaucratic administration to one concerned with results and efficiency (Bouckaert & Pollitt, 2011).

Another example is the digitalization and simplification of administrative procedures, which began in the 2000s and sought to reduce excessive red tape and streamline the provision of public services (Choi, 2011). Integrated service centers, e-government platforms and more user-oriented processes (one-stop services) were created, highlighting management's concern with service quality and policy effectiveness (Yu, 2011).

These initiatives are reflected in government discourse: successive Chief Executives have emphasized the importance of modernization and administrative efficiency in their Policy Addresses. For example, during the Chui Sai On administration (2009–2019), “e-governance” and “administrative simplification” programs were launched to improve internal efficiency and convenience for citizens. According to the Government Action Guidelines for the 2020 financial year, both the Public Administration and the legal system of Macao, which have been in operation for more than two decades, show signs of maladjustment in the face of socio-economic changes in the Region – demonstrating limitations in their ability to respond to the new demands of society and, as a result, progressively falling short of the population's expectations in terms of the effectiveness, efficiency, transparency and quality of public services (Mota, 2019).

In conclusion, Macao has transitioned from a predominantly procedural legalistic administration to a legalistic administration with management features. Legal norms and procedures continue to guide state action (and legitimize decisions before the law), but there is greater concern with performance, quality and efficiency, evident in administrative reforms and government discourse. This synthesis highlights the hybrid nature of the system: the Napoleonic tradition provided the legal-bureaucratic backbone, while the contemporary influence of New Public Management and the pragmatism of the Chinese administrative tradition brought in elements of public management. The result was a gradual improvement in efficiency (for example, Macao has high levels of government effectiveness according to the Worldwide Governance Indicators (Government Effectiveness dimension). The score rose from 55.98 (percentile) in 1998 to 72.44 in 2010, reaching 73.04 in 2022, reflecting a continuous improvement in the perception of the quality of public services, policy formulation and implementation, and government credibility).

### **5.3 Administration and Politics**

During the Portuguese colonial period, especially in the final decades (1980–1999), Macao did not have a fully democratic system: The Governor, appointed by the President of the Portuguese Republic, concentrated executive powers and relevant legislative powers, assisted by a only partially elected council and a Legislative Assembly with a mixed composition, resulting from direct and indirect suffrage, with a strong presence of organized interests (Cardinal, 2008; Shiu-Hing, 1989). In this context, management positions in the administration were often filled by political appointment.



Yee (2001) characterizes the Portuguese administration in the final decades as an executive-centered and politicized system: The Governor and under-secretaries were political appointments and, although directors and deputy directors were formally career civil servants, many were recruited from Portugal on a contractual basis and linked by personal relationships to the under-secretaries, tending to leave when their “patrons” were replaced. This pattern reinforced the politicization of top appointments and constrained the progression of local staff. There was thus politicization of appointments at the top, which is consistent with characteristics often associated with the Napoleonic administrative tradition: permeability between political and administrative careers, the presence of a logic of ‘spoils’ and the politicization of senior positions (Ongaro, 2010).

However, after the transition of Macao's administration to China, the top ranks of the administration – secretaries, directors of services and other senior positions – came under the direct control of the new Chief Executive (Basic Law of the Macao SAR, arts. 45, 50 (6)), and indirectly under the influence of Beijing (Chou, 2013).

Political loyalty has thus become an explicit criterion: senior officials in Macao are expected to be politically reliable to the Central Government (Yee, 2014). This suggests the persistence of political interference in the bureaucracy – a feature compatible with the Chinese administrative tradition, insofar as the boundaries between politics and administration tend to be more porous and the bureaucracy remains strongly subordinate to political leadership (party-state) and also observable in the Napoleonic tradition (Cheung, 2010; Christensen & Fan, 2018; Painter & Peters, 2010a).

In recent years, some secretaries have been recruited from civil society figures – businesspeople or professionals with backgrounds outside senior civil service – reflecting the importance of economic and associative elites in the MSAR's ruling coalition (Kwong, 2017). However, their selection does not follow any logic of party distribution, not least because Macao is, as Lou and Tang (2023) note, a society without political parties, but rather the personal and political trust of the Chief Executive and the requirement that the main leaders be “patriots who love the country and Macao”, as emphasized in official statements.

#### **5.4 Administration and Service**

In the context of Macao, the administrative culture inherited from the Portuguese period was close to a hierarchical and unprofessional bureaucratic model, in which the administration saw itself primarily as an instrument of government and political control, rather than as a service to citizens (Bolong, 2011). As Lo (1995) describes, the civil service before the transition was characterized by inefficiency, low levels of education among many employees, endemic corruption, frequent reorganizations, recruitment and promotion based on political patronage, and intense conflict between departments, to the extent that Macao's bureaucracy could be considered ‘from a Weberian perspective, underdeveloped and backward’ (Hing, 1995, p. 116).

After 1999, in the context of the international spread of public administration reforms and drawing explicitly on the experiences of the US, the UK, Hong Kong and Singapore,



the discourse on the need to “serve the people” and cultivate a citizen service mentality began to take hold in Macao (Kei, 2005). During Edmund Ho's first term (2000–2004), despite the difficulties already analyzed, this translated into initiatives to improve public services, such as the simplification of administrative procedures, the creation of integrated one-stop public services, the introduction of Quality Charters and quality management systems, and the strengthening of training for civil servants in customer service and modern management skills (Kei, 2005).

However, there remains a cultural gap between the official discourse of ‘government at the service of the people’ and the routines of many career civil servants, trained in a traditional administrative culture. Ho Iat Seng himself, in his 2020 Policy Address, set as a goal ‘strengthening the service awareness of civil servants’ and ‘correcting the service attitude, avoiding bureaucratic practices,’ which implies recognition that behaviors marked by formalism and a predominant concern with compliance with internal rules continue to exist, rather than proactive resolution of citizens' problems.

However, it should be noted that Macao's economic prosperity – largely supported by the expansion of the gaming sector and the associated increase in public revenues – has enabled the Government to strengthen, in certain areas, the provision of social services and benefits (namely, public/subsidized healthcare provisions and the expansion/planning of public housing), as well as to institute universal cash transfers to residents through the Wealth Partaking Scheme launched in 2008 (Kwong, 2013; Lok, 2011).

Macao continues to adopt a more pronounced public service perspective, without, however, abandoning its inherited formalism. Thus, there is a certain tension between the persistence of complex procedures and documentary requirements (a classic bureaucratic trait) and the growing orientation towards making life easier for citizens/customers. The Chinese administrative tradition, which values harmony and avoids confrontation, also encourages officials to be helpful and solve citizens' problems in order to maintain social order – which, in this respect, converges with the notion of service. In short, administration or service in Macao is becoming increasingly ‘service-oriented’, albeit within the limits of a bureaucracy still regulated by strict legality.

## **5.5 State and Society - II**

Historically, under Portuguese administration, Macao developed limited forms of corporatism: the Portuguese government, especially from the 1980s onwards, institutionalized councils and advisory bodies that included representatives of economic and community interest groups. The Consultative Council itself was composed of members appointed by the Governor, representatives of municipal bodies and representatives of interest groups (Luz, 2000), which reinforced the logic of functional integration of economic and associative elites in the governance of the territory (Chou, 2015; Lou, 2004).

After 1999, Macao maintained – and even expanded – the structure of advisory bodies inherited from the Portuguese period, now having dozens of sectoral advisory councils



(education, health, tourism, administrative reform, among others), created under the Basic Law to consult society on different policies. However, as Wang and Li (2023) show, decision-making remains concentrated in the Executive Council and the councils directly dependent on the Chief Executive, with the Government deciding on the creation of bodies, convening meetings and setting the agenda, while many councils and the general public intervene only passively, which means that consultations run the risk of becoming a mere formality.

Until 2017, Macao had an exceptionally large number of associations - approximately 7,000 - resulting in a remarkably high density of organizations relative to its population (Macao Youth Federation, 2020). However, existing research indicates that this pattern of associativism reflects a specific corporatist model of state-society relations. Historically, participation in associations has served as the primary channel for political engagement in Macao, as individuals seldom act independently in the political sphere (Kai Chun, 2012). The government, both during Portuguese administration and in the Macao SAR, co-opted the leaders of the main associations as representatives of community interests, in an informal corporatist arrangement. As one analyst points out, "relations between associations and the government have characteristics of corporatism: [...] associations have no autonomous will, while influences on civil society are weak" (p. 133). In the most recent period (since 2019), Ho Iat Seng's official rhetoric on administrative reform has emphasized the need to "listen to society" and "enhance transparency", possibly in response to the recommendations of international reports and the context of Hong Kong after the 2019 protests.

Thus, the Region coexists with a semi-state civil society, where the main associations act as conduits for government policies to the population, rather than channeling independent pressure from the people to the Region. The relationship between the State and society - particularly with regard to the participation of interest groups, social organizations and citizens in the public policy process - in Macao has mixed characteristics, but tends more towards the statist and controlled model, close to the traditional Napoleonic model and, in a way, even more restrictive, in line with the Confucian view that autonomous interventions by civil society are illegitimate.

## 5.6 Uniformity

With regard to the uniformity of the administrative apparatus and its degree of decentralization, Macao has a highly uniform and centralized structure, which is consistent with both the Napoleonic tradition (centralized unitary states) (Peters, 2021) and the Chinese model (unitary state with strong central control) (Cheung, 2010).

In fact, Macao, being a region with a small geographical area and population, does not have a local political-administrative level with true autonomy (the former municipalities were abolished and replaced by an advisory body with no political power) (Faria, 2023).

Public services, civil service statutes, administrative procedures and service delivery mechanisms are largely common across the territory, promoting a high degree of formal equality in terms of access and equal treatment of citizens (Bolong, 2011; B. Kwong,



2011; Yu, 2011). This configuration is consistent with the Napoleonic tradition (Ongaro, 2010) inherited from the period of Portuguese administration, in which regulatory and administrative uniformity is anchored in the law, in the administrative career and in the predictability of procedures (for example, the Macao Administrative Procedure Code (essentially derived from the Portuguese code) establishes principles of equality, impartiality and uniformity in the conduct of administrative proceedings) (Torrão, 2016). In the post-1999 period, this situation did not change substantially; in fact, during negotiations on the future of Macao, this option of maintaining and adapting local legislation became known as the “localization of laws”, i.e. their continuity under Chinese administration, but anchored in the MSAR’s own legal system. (Mendes, 2013).

Based on Alsancak et al. (2022), who characterize the People's Republic of China as a system with a highly centralized bureaucracy and strict control over local governments, the MSAR can be seen (like Hong Kong), from the perspective of the political center in Beijing, as an exceptional institutional arrangement: a Special Administrative Region that has a high degree of autonomy from the Beijing administration. In terms of Peters' theory (2021), we can argue that Macao therefore combines high intra-regional uniformity, consistent with the Napoleonic tradition (of the Portuguese legacy), with low uniformity at the Chinese state level, since it embodies a solution of internal institutional pluralism. This dual position – uniformity “inside”, diversity “outside” – is central to understanding the hybrid nature of Macao’s governance model and how continental European legacies and the political logic of the PRC are articulated within it.

## 5.7 Accountability

Applying the accountability aspect to Macao, the starting point is to understand that accountability is organized primarily around legal and administrative mechanisms, rather than political-democratic control mechanisms in the classical sense. From a political-institutional point of view, the Basic Law establishes a fairly vertical chain of accountability<sup>4</sup>:

- The Chief Executive is accountable to both the Central People's Government and the Macao SAR;
- The Government must obey the law and be accountable to the Legislative Assembly, presenting policy reports, implementing the approved budget and responding to questions from Members of Parliament. However, given that the Chief Executive is chosen by a restricted electoral college and only some of the Members of Parliament are elected by direct suffrage, political accountability is based more on a logic of upward accountability (to Beijing and the local political and administrative elite) than on direct accountability to the voters.

<sup>4</sup> Cf. articles 45.º, 47.º and 65.º of the Basic Law of MASR and respective annexes I and II.



At the legal and administrative level, accountability is strongly law-based and ex post. Macao's courts, including the Administrative Court, exercise control over the legality of administrative acts and sub-legal regulations, ensuring that the Administration acts in accordance with the law and offering citizens means of appeal against illegal or unfair decisions.

The Macao SAR also has two central pillars of specialized accountability, as provided for in the Basic Law itself:

- the Commission Against Corruption (CACC), which operates independently and whose Commissioner reports to the Chief Executive, with the dual mission of fighting corruption and acting as an ombudsman, investigating complaints of illegality or maladministration and recommending changes to procedures and systems (Chang, 2011);
- the Audit Commission (AC), which is also independent, conducts financial and value-for-money audits of the Administration, contributing to accountability for the use of public funds, although its Director is politically accountable to the Chief Executive and not directly to the Legislative Assembly (Tan, 2011).

Both combine classic ex post control functions with a growing role in prevention and advice, close to what Peters (2021) describes as recent attempts to strengthen accountability through NPM-inspired reforms (performance audits, system improvement, promotion of integrity).

We can therefore say that in Macao, accountability is based primarily on internal, legalistic, judicial and administrative accountability, typical of the Napoleonic tradition, reinforced by specialized control bodies (CACC, AC, courts), and only partially on a logic of pluralistic and societal political accountability. By way of illustration, according to the Worldwide Governance Indicators (Voice and Accountability dimension), Macao's percentile score was 59.17 in 1998, rising to 69.26 in 2019, but fell again to 57.96 in 2024, suggesting a deepening of the limitations on political participation and democratic accountability over the last decade.

This configuration contributes to a hybrid model: a strong emphasis on legality and administrative integrity, combined with a political structure in which accountability is exercised mainly “upwards” (Beijing and the Chief Executive) and less “outwards” (citizens and public opinion).

## 6. Conclusion

At this point, we believe that our analysis supports the view that Macao is a hybrid model in which two administrative traditions coexist and influence each other. On the one hand, there is a Napoleonic framework, with elements such as the primacy of Portuguese law and legal-administrative formalism, a high degree of administrative uniformity, and the prevalence of legal control and review mechanisms. On the other hand, there is a political



logic compatible with the Chinese administrative tradition, marked by the centrality of the executive, the fusion of administration and politics, and accountability patterns that are more vertical ('upwards') than pluralistic ('outwards'). We also note that there are several arrangements that belong to both administrative traditions, resulting in arrangements that interact.

In terms of the aspects outlined by Painter and Peters (2010) and Peters (2021), the study highlights: (i) an organic and Region-centric government; (ii) a "law vs. management" axis that tends to be legalistic, but with the incremental incorporation of administrative modernization practices and a focus on results; (iii) permeable boundaries between politics and administration; (iv) an incomplete transition from "administration" to "service", with efforts to improve service and simplification, but persistence of formalistic routines; (v) consultative and relatively limited civic participation; (vi) strong centralization and administrative uniformity; and (vii) mainly legal-administrative accountability, reinforced by specialized bodies, with limitations on political-democratic scrutiny.

In terms of its contribution, we consider that the study shows that the MSAR should not be seen as a simple continuation of the period of Portuguese administration or as a mere importation of the PRC's administrative model: it is a hybrid configuration, in which the maintenance of the legal and administrative framework coexists with a political and symbolic reconfiguration aligned with priorities of stability and central governance.

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