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## **‘One country, two systems’ in transition**

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### **Abstract**

The governance structure of ‘one country, two systems’ for Hong Kong is right at the midpoint of its 50-year tenure since the city’s return to China in 1997. Invented by Deng Xiaoping with a mixture of innovation, boldness, pragmatism and compromise, the policy design was of high strategic importance in Deng’s agenda not only of national unification but also of national modernisation. But the policy contains an intrinsic contradiction between ‘one country’ and ‘two systems’ at an operational level. The functioning of this contradiction has been determined by external and internal forces and intergovernmental power relationships. The rise of China’s economic power and political authoritarianism, Hong Kong’s internal divisions and frustrations, and increasingly confrontational geopolitics present settings that are profoundly different from the early 1980s when the policy was initially imagined and designed. An overall shift, albeit incremental and gradual, from ‘two systems’ to ‘one country’ has begun speeding up in recent years. The 2019 street movement, the 2020 national security law and the 2021 electoral system reform have expedited this shift. ‘One country, two systems’ is being reinterpreted and reinvented.

**Keywords:** one country, two systems; Hong Kong; democracy; authoritarianism; geopolitics.

## Introduction

The 2019 street movement, the 2020 national security law and the 2021 electoral system reform in Hong Kong mark a turning point of ‘one country, two systems’, which is right at the midpoint of its 50-year tenure. Readings of these events, like many other readings about Hong Kong and aspects of (Mainland) China, often bifurcate, mainly between the Chinese discourse and the Western discourse. These discourses mix perspectives, stances, values, ideologies, geopolitics and wishful thinking. Hong Kong, as the most ‘un-Chinese’ Chinese city, is hotly debated and contested, within the city, within the nation and elsewhere. What has happened with regards to Hong Kong in recent years, and in recent decades, has meant different things, for different people, in different contexts. One central concern of these debates is about ‘one country, two systems’, the unique governance structure that has been applied to Hong Kong and Macau. ‘One country, two systems’ was originally proposed by Deng Xiaoping for Taiwan, in principle, to achieve China’s national unification. But it has been the most tested and contested in Hong Kong so far.

The events in 2019–2021 have raised a fundamental question: is ‘one country, two systems’ in demise or rebirth? This chapter attempts to address this question. It aims to unravel the very nature of ‘one country, two systems’—the way it was constructed, historically; and the way it is being reconstructed, *historically*. In doing so, this chapter examines the genesis and path of this policy until the present. This examination is grounded within the context of shifting relationality between Hong Kong and the Mainland to make sense of the construction and reconstruction of the policy, and to further inform a projection of its future.

Invented by Deng Xiaoping with a mixture of boldness, innovation, pragmatism and compromise, ‘one country, two systems’ was of high strategic importance in his agenda not only of national unification but also of national modernisation. However, the policy contains an intrinsic contradiction between ‘one country’ and ‘two systems’ at an operational level, shaping the way the policy has been proposed, implemented, interpreted and contested. The working of this contradiction has been determined by external and internal forces, by Hong Kong–Mainland power relationships, and further by geopolitical manoeuvring between China and the West. The rise of China’s economic power and its return to firm political authoritarianism, Hong Kong’s internal socio-economic inequalities and political divisions,

and increasingly confrontational China–West geopolitics present settings that are profoundly different from the early 1980s when the policy was initially imagined and designed. The settings now are also different from those in the 1990s when wishful thinking in Hong Kong, and the West in a broad sense, ‘wished’ for democratisation in the Mainland, triggered by China’s pursuit for a market economy and embrace with the (Western) world. An overall shift—incremental, gradual, but steady—from ‘two systems’ to ‘one country’ since Hong Kong’s return in 1997 seems to be accelerating in recent years. The scale, extremity and complexity of the 2019 street movement, and the subsequent 2020 national security law and 2021 electoral system reform have been expediting this shift towards a critical turning point. ‘One country, two systems’ is being reconstructed, through reinterpretation and reinvention, to ensure that ‘one country’ dominates ‘two systems’ in the new national and international contexts.

This chapter is structured to address the above aim and issues sequentially. In the second section, it revisits Deng Xiaoping’s notions and directives of ‘one country, two systems’, which are the foundation of the policy and its subsequent evolution. The third section tackles the conflicts between Hong Kong and the Mainland since the former’s return to China, through discussing several signature policy initiatives which, despite some good intentions, have achieved the opposite policy outcomes. The fourth section critically unpacks the structural contradictions between Hong Kong and the Mainland under ‘one country, two systems’, and the operationalisation of these contradictions that have paved the bumpy way for Hong Kong’s return. The fifth section compares Hong Kong and Shenzhen, to zoom in on the shifting relationality between them in the context of China’s economic rise. The sixth section explains how the chain of events from 2019 to 2021 have fundamentally reoriented, if not reversed, the pathway of ‘one country, two systems’, marking a turning point of the policy’s journey. The chapter concludes with a brief imagining of Hong Kong’s future under the reconstructed ‘one country, two systems’ approach.

## **Back to the origin: Deng Xiaoping**

Hong Kong is a colonial legacy of a humiliating period in Chinese history. The British army invaded China in 1840, which signified the beginning of the collapse of an old empire, as well as the beginning of the building of a new one. Hong Kong, originally a fishing village and a salt production

site, was ceded and leased to British rule, incrementally through several forced treaties with the Qing Dynasty Government between 1842 and 1898. In 1949, the People's Liberation Army (PLA) of the new communist regime, sweeping across the nation with an avalanche victory in the civil war against the nationalists, who fled to Taiwan, could have 'liberated' Hong Kong at that time with military ease. However, the PLA held its advance at the Shenzhen River and did not move across the border. Not to take over Hong Kong was a considered decision by Mao Zedong and his communist comrades. This decision proved strategically right: it has brought benefits, foreseen and unforeseen, to the newly established People's Republic of China (PRC). A colonial Hong Kong under the British rule was the PRC's only major access to trade and relationship with the West. This connection through Hong Kong was especially important for the PRC when it was under Western embargo during the early Cold War period. Maintaining a reasonable relationship with the United Kingdom via Hong Kong was a useful portal for China to engage with the West and the broader international community. Most importantly, Hong Kong's growth into an international metropolis during the postwar decades played an indispensable role in China's 'reform and opening-up' since 1978, an outcome unanticipated and maybe undesired by Mao Zedong, but well appreciated and utilised by his successor Deng Xiaoping.

A revisit to the originator of 'one country, two systems'—Deng Xiaoping—helps clarify several (mis)perceptions about Hong Kong's democratisation, autonomy and geopoliticisation in relation to China and the West. Deng invented the policy that has been in place for governing Hong Kong since its return to China on 1 July 1997. This policy was not invented for Hong Kong only; it was Deng's strategic approach to national unification with Taiwan, Hong Kong and Macau, which had been separated from Mainland China for various reasons and in different historical contexts—foreign invasions or civil war. Deng first publicly raised this notion for Taiwan on 26 August 1981 (Party Literature Research Centre of the CPC Central Committee 2004). On 24 September 1982 when he met with Margaret Thatcher in Beijing, Deng informed her that China would take over Hong Kong in 1997 and Hong Kong's 'capitalism', including its political and economic systems and most laws, would not change after that (Deng 1993). Deng's notion developed into so-called 'one country, two systems', which was instituted by the Basic Law, a bespoke mini-constitution ensuring Hong Kong's 'high degree of autonomy' for a term of 50 years after its return.

At a strategic level, 'one country, two systems' is an innovative policy invention to combine contradictions within a unity, based upon political vision, boldness, pragmatism and compromise. At an operational level, this political endeavour leaves considerable grey area for interpretation and leverage, making it an evolving policy, shaping and being shaped by the forces in play. Being experimental, evolutionary, contradictory and contentious has characterised the short history of this policy's implementation, as is explained in sections below.

Deng Xiaoping's encounter with and interest in Hong Kong could date back to 1920, when his ship stopped there on route to France (Vogel 2011). Deng was 16 years old, going to the West to study. In early 1992, when he was 88, Deng publicly expressed a wish to visit Hong Kong after its return to China. This wish was not fulfilled: he passed away on 19 February 1997 before Hong Kong's return on 1 July in the same year. Hong Kong had always occupied a special position in his strategy of unifying, modernising and opening China. In the early 1980s, a policy like 'one country, two systems' could minimise the disruptions of Hong Kong's forthcoming return, which would likely happen not only to Hong Kong itself, but also to the city's crucially important role in Deng's 'reform and opening-up' agenda for China. Announcing the policy was a confidence-building initiative, especially to those Hong Kong-based local and international capitals—the most important source of foreign direct investment (FDI) that the Mainland needed. Hong Kong's importance, as an international financial centre, for the Mainland's development in the late twentieth century was well appreciated by Deng Xiaoping. On several occasions, Deng expressed a desire of building several 'Hong Kongs' in the Mainland, including on one occasion during the Tiananmen Square movement—a students-led pro-democracy and anti-corruption movement clamped down by the army—in 1989, to advocate his open-door policies (Deng 1993).

Deng was explicit about the importance of maintaining Hong Kong's 'prosperity' and 'stability'—two keywords in the Chinese discourse of 'one country, two systems' and its application—before and after its return. In 1988, Deng used this importance to justify the necessity of the policy's 50-year term, the timeframe for China's growth into a 'medium-level developed nation' by the mid-twenty-first century in his modernisation strategy (Deng 1993). He assured the unchangeability of 'one country, two systems' by stating:

Actually, 50 years is a metaphorical term, ['one country, two systems'] won't change after the 50 years. Within the 50 years, it cannot change. After the 50 years, it is unnecessary to change. (Deng 1993:267)

This statement was based upon Deng's optimistic, confident forecast that China would have developed to a level that would render a change to 'one country, two systems' unnecessary when the 50-year term would expire in 2047. However, Deng did not specify how this logic would work—how a more developed China would be more unlikely to change 'one country, two systems'. History never evolves as promised; history follows its own trajectory.

Deng Xiaoping was an optimistic strategist; he was also a shrewd politician. He had a sharp comprehension of the historical, political and social complexity of Hong Kong, rooted in the city's colonial DNA, and associated with communist China's ideological differences from and geopolitical conflicts with the West. On several key occasions when discussing Hong Kong's future, Deng warned of possible instability, which could be caused by 'destructive forces' inside and outside Hong Kong and might happen before and after its handover (Deng 1993:73). He attached no less importance to Hong Kong's political stability than to its economic prosperity: he ascribed one potential source of instability to the Western political system and justified the necessity of central government's intervention in Hong Kong affairs. He stressed these points repeatedly.

In October 1984, when meeting a Hong Kong delegation to Beijing, Deng said:

Do not just worry about interventions generally. Certain interventions are necessary. We need to see if the interventions are conducive or harmful to the interests of Hong Kongers and Hong Kong's prosperity and stability ... Don't assume that there are not destructive forces ... Once turmoil happens, the central government should intervene ... There will be some factors of turmoil, troublemaking, and instability. Honestly, these factors won't come from Beijing; they may exist within Hong Kong or come from certain international forces. (Deng 1993:73–75)

In April 1987, when meeting the committee responsible for drafting the Hong Kong Special Administrative Region (SAR) Basic Law, Deng articulated his views on 'one country, two systems' most comprehensively. He particularly pointed out:

Hong Kong's [political] system should not be completely Westernised, should not just transplant the Western way ... If we just completely transplant, for example, the separation of powers and the British or American parliamentary systems, and judge

whether it is a democracy according to this, I'm afraid it is inappropriate ... For Hong Kong, universal suffrage is definitely advantageous? I don't believe it ... The people who govern the Hong Kong affairs must be those Hong Kongers who are patriots of the motherland and Hong Kong. Will universal suffrage definitely elect the right people? ... Don't assume that Hong Kong affairs will be the responsibility of Hong Kongers only, and the central government won't care at all, and then everything will be ok. This is impossible, and this thought is unrealistic. The central government won't intervene into the daily business of the SAR; it is unnecessary. But will there be events in the SAR that will damage the fundamental national interests? Won't they happen? ... Think about it soberly: will Hong Kong sometimes have problems that cannot be solved without Beijing's involvement? ... What if Hong Kong is turned into an anti-Mainland base under the disguise of 'democracy'? Then we must intervene. (Deng 1993:220–21)

In June 1988, Deng said:

Hong Kong needs stability. It needs to be stable during the transition period; it also needs to be stable after China resumes sovereignty and Hong Kongers are responsible for governing. This is the key. Hong Kong's stability, apart from economic development, requires a stable political system ... Hong Kong's political system today is neither the British system nor the American system, and should not transplant the Western way in the future. (Deng 1993:267)

Deng Xiaoping made these statements and warnings more than 30 years ago. They seem to anticipate the conflicts between the Chinese Government and the British Government with regards to the democratic reforms in Hong Kong in the 1990s before the handover, and the political conflicts and movements in Hong Kong in the twenty-first century. A series of political unrests, mixed with the city's economic fluctuations and social problems, have challenged and transformed the perception and practice of 'one country, two systems'. But the fundamentals of 'one country, two systems' were clearly defined and delineated by its inventor Deng Xiaoping: Hong Kong would not be democratised in a Western sense; Hong Kong would not be autonomous in a complete sense; patriotic Hong Kongers would govern the city; the central government would intervene should Hong Kong turn into turmoil or an anti-Mainland base. These fundamentals have underlain the construction and reconstruction of 'one country, two systems' in different contexts.

## Conflicts in integration

Hong Kong, as an SAR under the governance structure of ‘one country, two systems’, formally returned to China in 1997. But Hong Kong’s economic integration with the Mainland started even earlier, from 1978 when China entered the ‘reform and opening-up’ era (Smart and Lin 2004; Shen 2008; Chan 2011). In the beginning of the twenty-first century, accelerated economic integration upset the Hong Kong–Mainland relationship, turning it into one of diverging rather than converging social acceptance and attitudes—a situation that was unforeseen in the 1980s when the ‘one country, two systems’ framework was designed.

This situation resulted, first of all, from the shifting economic power relationship between the ‘capitalist’ Hong Kong and the ‘socialist’ Mainland—the latter’s rapid rise and the former’s relative decline. A dividing line seemed to be the Closer Economic Partnership Agreement (CEPA) between the Mainland and Hong Kong, signed on 29 June 2003. CEPA, a free trade agreement to grant preferential access to markets, was meant to boost Hong Kong’s economy, which had been in recession since the 1997 Asian Financial Crisis and was further wrecked by the severe acute respiratory syndrome (SARS) outbreak in early 2003. CEPA’s stimulus to Hong Kong’s economic recovery was immediate and impressive: after 2003, Hong Kong’s economy reversed its downward trend and started to recover. The year 2003 thus seemed to mark a shift in the Hong Kong–Mainland economic relationship: before 2003, it was largely a one-way economic input from Hong Kong to the Mainland, or Hong Kong-led Mainland development; after 2003, it turned into a two-way economic interaction with increasing Mainland-backed Hong Kong development. Ever since, Hong Kong has been the primary destination of the Mainland’s outward FDI. In 2003, 40.25 per cent of the Mainland’s outward FDI went to Hong Kong; by 2016, this figure had increased to 63.03 per cent (Chen 2019).

CEPA and subsequent pacts on economic and social exchanges, while bringing about closer economic integration and more frequent social interactions, created unintended and undesired social and cultural outcomes that have divided many Hong Kongers and Mainlanders. Under CEPA, the earlier control on Mainland visitors to Hong Kong was significantly liberalised, to stimulate local tourism and the market. This included the introduction of an ‘individual visit scheme’, prior to which the Mainlanders could only visit Hong Kong in group tours or on a business visa. The effect



of this scheme was astounding: the number of Mainland visitors sharply increased after 2003 and became the dominant market source of Hong Kong's tourism (Chen 2019; Hong Kong Tourism Board 2020). Hong Kong was an ideal destination—for its geographical proximity, cultural kinship, economic and political freedoms, and international metropolis status—for investment, residence and shopping for those better-off Mainlanders.

The massive influx of the Mainlanders, an outcome of an economic rationale, exerted heavy pressures on Hong Kong's consumer products and civic infrastructures, and caused growing disquiet among many local residents. The disquiet was mixed with long-held differences over history, values and ideology between the two social groups; and further mixed with a disrupted perception of the Mainlanders—who were traditionally poor but many of whom were now (sometimes exceptionally) wealthy. Many Hong Kongers indulged in a sort of wishful thinking about 'one country, two systems', that the policy would ensure the city's status quo without re-embedding itself into the national and regional contexts, and they were thus unprepared when things happened against this wish (Lui 2015).

Here are two cases to illustrate the impact of the influx of Mainlanders on Hong Kong's local resources and attitudes. One is birth tourists, referring to the Mainland pregnant women giving birth in Hong Kong hospitals. Since 2001, the so-called 'doubly non-permanent resident (DNR) children'—born in Hong Kong but with neither parent a Hong Kong permanent resident—were entitled to become permanent residents of Hong Kong. Lured by the permanent resident status and enabled by the 'individual visit scheme' under CEPA, a rapidly growing number of birth tourists came to Hong Kong. In 2001, there were 620 DNR children, accounting for only 1.29 per cent of locally born children in the year; in 2011, the DNR children soared to 35,736, a share of 37.44 per cent of all local newborns that year (Chen 2019). These birth tourists generated pressures on the local hospitals and health facilities, and the DNR children would also access educational and civic resources in the future. Dissatisfied with these Mainland women and children, some extreme Hong Kongers labelled them with the derogatory term 'locusts'.

The other case concerns baby milk formula. In 2008, the Mainland fell into a crisis of distrust towards domestically produced baby milk formula, due to a scandal of milk adulterated with melamine, a toxic industrial compound. Hong Kong provided a ready source of such products with assured quality and reasonable prices. Mainland purchasing and illegal smuggling created

a shortage of baby milk formula for local Hong Kong consumers, which led to occasions of public protests against and conflicts with Mainland shoppers in the streets of Hong Kong.

From around 2010, antipathy towards Mainlanders was on the rise in Hong Kong. There were occasional incidents when Mainlanders were openly targeted and humiliated by some local residents in Hong Kong. These backlashes to the influx of Mainland tourists and shoppers caused some policy responses. A zero quota on DNR children was imposed on 1 January 2013, which significantly reduced the number of DNR children born in Hong Kong. In February 2013, the Hong Kong Government restricted shoppers' purchase of baby milk formula and clamped down on smuggling, alleviating local market shortages. From 13 April 2015, Shenzhen residents could visit Hong Kong only once a week, to limit the number of visitors. These policy changes, coupled with anti-Mainlander attitudes and incidents, discouraged Mainland visitors and consumers to Hong Kong. From 2015, the previous growth trend of Mainland visitors to Hong Kong reversed (Chen 2019).

## Structural contradictions

This anti-Mainlanders sentiment is partially indicative of the structural contradictions between the Mainland and Hong Kong under 'one country, two systems'. These contradictions are dynamic and changing, constituting the shifting relationality between 'socialist' Mainland and 'capitalist' Hong Kong, which are quintessentially contradictory in a unity of 'one country'. The power relationships between the Mainland and Hong Kong, the major forces shaping these contradictions, have been shifting, leading to new forms of contradictions in recent decades. These new power relationships and new forms of contradictions are further reshaping the interpretation, operationalisation and leverage of 'one country, two systems'. These structural contradictions are examined below across three broad domains—economic, political and sociocultural—to inform an understanding of the contexts of 'one country, two systems' in transition.

The economic contradiction is the least contested, but is the most foundational in shaping the Mainland–Hong Kong relationality. China's economic rise into the world's second largest economy has marginalised Hong Kong's position in the national economic system. It is fair to say that Hong Kong's contribution to China's economic rise has been enormous: China's door was opened, first of all, to Hong Kong from the late 1970s.

By September 2017, 52.6 per cent of the cumulative FDI that was actually used in the Mainland came from Hong Kong; Hong Kong's share of annual FDI in the Mainland fluctuated between 30 per cent and 70 per cent in most of the years since 1978 (Chen 2019). FDI has played an indispensable role in China's rapid economic growth and urbanisation (Hu 2013). In 1978, Hong Kong's gross domestic product (GDP) was equal to 14 per cent of China's, and this figure reached a peak of 27 per cent in 1993; in 1997 when Hong Kong was returned to China, its share of China's GDP was 18.4 per cent, but this has since plummeted to only 2.7 per cent in 2018 (Sin 2019). As of 2019, three Chinese cities have surpassed Hong Kong in GDP: Shanghai, Beijing and Shenzhen. Hong Kong, despite being a leading global city, is being challenged and surpassed by the rising Chinese top cities, most importantly, by its neighbouring city Shenzhen. Here is an international comparison to further illustrate Hong Kong's economic challenge: in 2000, Singapore's GDP was 56 per cent of Hong Kong's; measured by GDP per capita, Singapore surpassed Hong Kong in 2003; in 2017, Singapore's total GDP surpassed Hong Kong's; in 2018, Hong Kong's GDP per capita was 75 per cent of Singapore's (Country Economy 2020).

These national and international comparisons reflect a decreasing competitiveness in Hong Kong's economy, despite being crowned as having 'the most economic freedom of the world', even in 2019 when the city was in a turmoil (Gwartney et al. 2019). The structural problems of the city's economy are generating social and political externalities within the city and in the national context. Hong Kong's increasing economic integration with the Mainland, while helping Hong Kong to draw upon the opportunities from the Mainland's economic growth and bringing Hong Kong onto the national development track, has come with strong political and social repercussions.

Politically, the central contradiction lies in the leverage between 'one country' and 'two systems'. The Mainland and Hong Kong may select the part of 'one country, two systems' that suits their preference and interpret it differently: for the former, it is a policy design for national unification; for the latter, it is a contractual guarantee for the SAR's autotomy even towards a more democratic system (Scott 2017), based on a sort of wishful thinking (Lui 2015). In the 1980–1990s 'two systems' prevailed over 'one country' in discourse and practice. For example, in 1989 Chinese president Jiang Zemin used the old Chinese saying 'well water won't interfere with river water' to describe the Mainland–Hong Kong relationship, analogising Hong Kong's autonomy and the Mainland's noninterference. This contradiction became

prominent in the twenty-first century when the central government asserted an 'overall jurisdiction' over Hong Kong in a white paper issued in 2014, responding to escalating pursuits for autonomy and democratisation in the city. The intrinsic contradiction in 'one country, two systems' was glossed over, intentionally or unintentionally, when the policy was initially designed and discussed. But the contradictory nature immediately emerged and took effect in the policy's early practice. The contradiction has been ever accelerating, increasingly bifurcating interpretations of and approaches to the policy. This bifurcation has materialised through the Mainland's rising authoritarianism under Xi Jinping vs Hong Kong's growing frustration with lack of progress in democratisation; and through the Mainland's assertion on national sovereignty and security vs Hong Kong's resistance against Mainlandisation and its anti-Mainland sentiment. These contradictions have contributed to a series of political protests and movements in Hong Kong, and determined the pathways of these political actions.

An associated social consequence of those economic and political contradictions in the policy is the growing alienation between many Mainlanders and many Hong Kongers. Kinship works in non-contradictory situations. When contradictions arise, a sense of supremacy among many Hong Kongers would surface when interacting with Mainlanders, as seen in those public anti-Mainlander incidents. On the other hand, after experiencing, observing and knowing a 'real' Hong Kong, with its structural economic and social issues, many Mainlanders become disillusioned with Hong Kong—a strong contrast to how the city was imagined through much of the twentieth century when few Mainlanders could visit it. A sense of nationalism, boasting of the nation's economic recovery and confident path towards modernisation, is rapidly surging in the Mainland. Within certain social groups, this nationalism is transitioning to a chauvinism about the 'China model', propagated as, at most, superior to and, at least, an alternative to the 'West model' that has defined what Hong Kong is about. For many Mainlanders, the colonial and Western elements in Hong Kong's history are a humiliation, and should be decolonised to embrace and nurture a centripetal identity of 'Chineseness'.

However, a powerful and assertive Mainland is accelerating the growth of localism and even populism in Hong Kong. Accordingly, there has been a growing de-identification with 'Chineseness', in favour of 'Hong Kongness'—a centrifugal identity inherited from the city's colonial history and connection with the West, to which Hong Kong belongs in the perceptions of many. This mindset has mingled with an anti-Mainland

mentality arising from 2003 and a latent distrust in the Chinese regime that has been long entrenched (Chan 2018). Outside the Mainland, there is a Greater China community, to which Hong Kong is integral. This Greater China community has been established upon a common historical and cultural identity, which differentiates itself from Mainland China—a communist regime—in terms of what defines 'Chineseness' or even Chinese nationalism and patriotism. The sociocultural divide between the Mainland and Hong Kong has never been wider than at the turn of the second and the third decades of the twenty-first century, more than two decades after the city's return. Hong Kong has returned constitutionally, integrated economically, but it has not returned socially and culturally for many Mainlanders.

Despite Hong Kong's return to China's sovereignty in 1997 under 'one country, two systems', this governance structure's contradiction and its economic, political and sociocultural representations have underpinned the city's political and social movements, which have been intensifying in the twenty-first century. The collective effects of these contradictions, coupled with the city's acute socio-economic inequality and livelihood challenges, culminated in the second half of 2019 when the city experienced its most traumatic and radical street movement against the governments of the Hong Kong SAR and China. This movement was ignited by a controversial extradition bill that was later withdrawn, but it instantly developed into a prolonged state of violence and social intolerance, correspondingly met with a firm police response, an unusual political disputation and social conflict in a global city like Hong Kong. This 2019 movement has split Hong Kong society and damaged the mutual Hong Kong–Mainland understanding to an unprecedented degree.

## Hong Kong vs Shenzhen

No other pair of cities in the world is like Hong Kong and Shenzhen. They contradict in interdependence; they compete in collaboration. Geographically, they could be one city—it takes 14 minutes to commute between Shenzhen Futian and Hong Kong West Kowloon stations via a high-speed train. But a border line separates them into a 'socialist' Shenzhen and a 'capitalist' Hong Kong under 'one country, two systems'. Despite economic integration and infrastructure connections, the two cities

are historically and politically distinct. Investment and trade with Hong Kong count as foreign investment and international trade in Shenzhen (and the Mainland), and vice versa in Hong Kong.

The years 2019–21 have marked important milestones for both cities, in different, if not opposite, senses. In August 2019, when Hong Kong was in turmoil, the Chinese government promoted Shenzhen as a Pilot Demonstration Zone of Socialism with Chinese Characteristics to showcase the great achievement of the city as well as the nation. For Shenzhen, 26 August of 2020 was the 40th anniversary of its designation as a special economic zone (SEZ)—the earliest and the most strategic step for its growth from a fishing village into an international metropolis. For Hong Kong, the imposition of the national security law on 30 June 2020 was surely a turning point of the city's fate. One common reading of this law in the West is as a threat to Hong Kong's freedoms, rule of law and dynamism—the hallmarks of what Hong Kong was about. On 1 July 2021, the whole nation celebrated the 100th anniversary of the birth of the Chinese Communist Party (CCP) and the rebirth of the Chinese empire under the leadership of the CCP. In the official discourse, the journey of China's rebirth should trace back to 1840 when China was first invaded by the British army and Hong Kong was ceded as a result. Shenzhen is a primary symbol of the success of the party and of the nation. The nationwide buoyance overwhelmed another important fact: that the same date of 1 July 2021 also marked the 24th anniversary of Hong Kong's return, to which not many people even paid attention.

Shenzhen is a derivative city of Hong Kong. It was designated as an SEZ because of its proximity to Hong Kong, to capitalise on spillovers of investment, technology, knowhow and international markets. A local crisis also triggered the genesis of Shenzhen SEZ. In what's colloquially known as the 'grand flee to Hong Kong', nearly one million residents in Shenzhen and nearby areas of Guangdong province fled to Hong Kong to escape poverty, famine and persecution (Chen 2010). This phenomenon began from 1949 when the PRC was established, and it lasted for nearly three decades and reached a new climax in the late 1970s. Establishing an SEZ aimed not only to spearhead the nascent agenda of 'reform and opening-up', but also to provide local residents with economic opportunities to make the flight to Hong Kong less tempting. The rest is history.

Its relationship with Hong Kong has spurred Shenzhen's growth, which has further shifted the relationship between the two cities. Several measures illustrate the rapid growth of Shenzhen in comparison with Hong Kong.

Shenzhen's labour force and population overtook Hong Kong's in 1996 and 2000, respectively (Duhalde 2018). The economic shift, however, has attracted the most attention and discussion. In 1979, Shenzhen's GDP was negligible, accounting for only 0.09 per cent of Hong Kong's; in 2017, Shenzhen's GDP surpassed Hong Kong's for the first time (Duhalde 2018). Measured by GDP per capita, the gap between these two cities has been narrowing: in 1979, Hong Kong's GDP per capita was 53 times Shenzhen's; in 2017, Shenzhen's GDP per capita was 57 per cent of Hong Kong's (Duhalde 2018). Hong Kong's population was 60 per cent of Shenzhen's as of 2017 (Duhalde 2018). The difference in GDP per capita between Shenzhen and Hong Kong is explained by their population difference. It also reflects the qualitative difference between the economies of the two cities: Hong Kong remains more advanced and productive although Shenzhen is rapidly catching up and outperforms in aggregate.

From its birth, the central government has commissioned Shenzhen with a role of supporting Hong Kong's 'prosperity' and 'stability'—the two keywords emphasised by Deng Xiaoping in his notions about Hong Kong and 'one country, two systems' as stated earlier—through economic collaboration, social integration and infrastructure connections. In a national strategy launched in early 2019, both Hong Kong and Shenzhen were identified as economic engines for building the Greater Bay Area—a megaregion containing SARs of Hong Kong and Macau, and nine cities in Guangdong province (Shenzhen, Guangzhou, Zhuhai, Foshan, Huizhou, Dongguan, Zhongshan, Jiangmen and Zhaoqing)—into a world-class urban conglomeration (State Council 2019), like the New York megaregion, the San Francisco Bay Area and the Greater Tokyo area. Similar strategies were also mapped out for the Yangtze River Delta region, led by Shanghai, and the Beijing–Tianjin–Hebei city region. These megaregional strategies have reflected the central government's increasing attention to so-called 'new-type urbanisation' and readiness to assume more responsibilities in coordinating the planning and development of these city regions (Podger et al. 2020). The difference of the Greater Bay Area strategy is that it also has a political mission of fulfilling 'one country, two systems'—bringing Hong Kong and Macau onto the track of regional and national development. From the central government's perspective, the 2019 movement in Hong Kong and COVID-19 suggested a need to expedite this regional development approach.

Hong Kong's leading role in the Chinese urban system is being challenged, especially by its neighbouring city Shenzhen. In much of 2020, Shenzhen was the best performing major stock market, not Hong Kong, New York or London, largely thanks to a quick recovery of the Chinese economy from COVID-19. Apart from being a financial centre, Shenzhen is also a high-tech hub, home to such giant firms as Huawei and Tencent. Shenzhen is reputed to be the smartest Chinese city and a global innovation leader. It is building the most advanced 5G digital network in the world to lead a new round of a global innovation race. Meanwhile, Hong Kong is lagging behind in capturing these new opportunities to rebuild its competitiveness, and is confronting many problems with grave uncertainties for its future.

This intercity comparison and competition between Hong Kong and Shenzhen (and other leading Mainland cities) present new challenges for the city governments and the central government. Without doubt, Hong Kong's role and importance in the Chinese economy today was not comparable with the 1980–1990s before its return. But Hong Kong remains a leading global financial centre and has advantages—its integration with the global financial market and its connection with the West—that cannot be easily imitated or replaced by other Chinese cities. Shenzhen and Shanghai have surpassed Hong Kong in aggregate GDP and have also grown into international financial centres in their own rights. However, they cannot replace Hong Kong, in the short term at least, especially in the 'soft power' that has been nurtured in the city's colonial, 'capitalist' past—free market economy, Western connections and associated trust and confidence, international norms, professionalism, rule of law and business environment. For the central government, it is probably neither its wish nor its interest to see Hong Kong be replaced by a Mainland city or to be Mainlandised. Maintaining Hong Kong's colonial legacy and Western connections under the frame of 'one country, two systems' serves the purpose of 'killing two birds with one stone': national unification and Hong Kong's 'prosperity' and 'stability'. However, these two birds cannot always be killed with one stone; they could fly in opposite directions.

## A turning midpoint

As stated earlier, Deng Xiaoping designed 'one country, two systems' with a mixture of boldness, innovation, pragmatism and compromise in the early 1980s, targeting both national unification and national modernisation through 'reform and opening-up'. The intrinsic contradiction between 'one



country' and 'two systems' is analogous to the intrinsic contradiction of Deng's 'socialist market' reform across the Mainland. In both cases, there have been fluctuations in implementation. The operationalisation of them has been turbulent and evolutionary, subject to interpretation and transformation shaped by political and economic changes and dominant power relationships of the time. While China's economic liberalisation from the 1980–1990s did lead to some political reforms and greater personal freedoms, it was wishful thinking, mainly in Hong Kong and the West, that assumed some inevitable shift to democratisation of both Hong Kong and the Mainland and that 'two systems' would evolve into 'one country' that would be ultimately democratised, all in a Western sense.

The very contradictory nature of 'one country, two systems' has been exposed in a series of crises since Hong Kong's return, including the Occupy Central movement in 2011–2012 and the Umbrella Movement in 2014, each crisis leading to an incremental shift away from 'two systems' to 'one country'—the 'one country' based on the party-state system which has, since Xi Jinping's rise, returned to much firmer authoritarian control. Accordingly, the central government's narrative of the policy and manoeuvring of its implementation have changed from the metaphor of 'well water won't interfere with river water' to a constitutional assertion of 'overall jurisdiction', as stated earlier.

The year 2019 must be an important year in the future writing of Hong Kong's history, and of its relationship with the Mainland under 'one country, two systems'. For much of the second half of 2019, Hong Kong experienced its most radical street movement in recent decades. While no doubt responding to the shifting trajectory of 'one country, two systems', it divided Hong Kong society, challenged many aspects of the Hong Kong–Mainland relationship, and disrupted the beliefs and aspirations of many about the governance structure. It raised a fundamental question about the continued efficacy of 'one country, two systems', a policy designed in the late twentieth century, in the new settings of the early twenty-first century. The street movement has also paid an economic cost. The Hong Kong Government estimated that the city had a negative GDP growth rate of –1.3 per cent in 2019, and the city's economy 'has entered a technical recession' (Hong Kong Trade Development Council 2020). This recession was exacerbated by the outbreak of the COVID-19 pandemic which turned into a global recession in 2020. But the social and political costs have been more severe, although they are not as measurable as the economic cost.

The strongest backlash to the 2019 street movement has been political, unsurprisingly. The central government changed the high-level officials in charge of Hong Kong affairs in early 2020: Luo Huining was appointed the director of the Liaison Office of the Central People's Government in Hong Kong on 4 January; Xia Baolong was appointed the director of the Hong Kong and Macau Affairs Office on 13 February. Both appointees are veteran provincial party secretaries. They resumed their political careers in a sort of alien area, probably in a hope of bringing some fresh thinking and new approach to Hong Kong affairs through their political experiences and leadership. One common observation and criticism in the Mainland is that the leadership of Hong Kong affairs at the central government and the local government levels needed to be revamped, drawing upon the lessons of the city's poor governance. At the central government level, the leadership of Hong Kong affairs has traditionally comprised cadres with backgrounds in diplomatic and international relations. They lack the political vision and skills to tackle the complexity of Hong Kong, and have failed to engage the people and the real day-to-day issues within the city. Meanwhile, the long British rule of Hong Kong and the short history of handover have created a situation where the top administrators within the SAR government have been mostly elevated from the old civil service system. They are not home-grown public leaders who have the sort of political wisdom, capacity and responsibility that are commensurate with governing the city in such adversity. The appointment of veteran party secretaries to be in charge of Hong Kong affairs came as a surprise. What was more of a surprise were the measures taken by the central government after these appointments.

On 30 June 2020, the National People's Congress (NPC), China's legislature and nominally the highest organ of state power, passed the *Law of the People's Republic of China on Safeguarding National Security in the Hong Kong Special Administrative Region*; on 11 March 2021, the NPC further enacted the *Decision on Improving the Electoral System of the Hong Kong Special Administrative Region*. The 2020 national security law and the 2021 electoral system reform are indeed the latest and the most fundamental transformation of 'one country, two systems', responding to many issues and tensions that have been accumulating since Hong Kong's return and culminating in 2019. The scale and extremity of the 2019 movement exposed many of the structural problems—economic polarisation, social division and political distrust—within Hong Kong and between Hong Kong and the Mainland, which further involved geopolitical complexities.

The 2019 movement, ultimately, caused the central government to run out of patience due to concerns over national unification and security, as well as its lack of confidence in Hong Kong's capacity for self-governance.

A similar national security law, according to Article 23 of the Basic Law, was supposed to be enacted in and by Hong Kong. But it could not get through for 23 years after the city's return, out of opposition and concerns over its potential impacts on human rights and freedoms of expression and assembly. The central government has long had legitimacy to enforce such a law. It did not do so, arguably with unusual patience, tolerance and possibly good will, which all seemed to be overlooked within Hong Kong. In theory Hong Kong remained somewhat undefended for 23 years—which global city does not have a national security law in place? But the timing and the manner of this law's enactment, and its draconian and sweeping articles—an intentional policy design under Xi—are raising justified concerns over its (mis)use to clamp down on dissent in the name of national security.

The new electoral system adheres to the principle of 'patriots governing Hong Kong' set by Deng Xiaoping, changing the election systems and processes for the chief executive and the Legislative Council (LegCo). The change aimed to ensure the 'right' people for Beijing to be 'elected' to run the Hong Kong Government, which has been impacted and even paralysed by the city's political divisions and confrontations. The change systematically prevents the anti-government and broader prodemocracy members from entering the government. Most of all, it seals any imagination and wishful thinking that someday Hong Kong would be democratised in a Western sense. After the new election system was in place, Beijing got what it wanted in the latest elections of both the LegCo and the chief executive. On 19 December 2021, in the election of the 7th LegCo, nearly all seats were taken by pro-establishment 'patriots' apart from one non-establishment member. On 8 May 2022, in the election of the 6th term of the chief executive, John Lee, the only candidate and a firm 'patriot', won it unanimously.

Hong Kong is being transformed in critical situations both at home and in its international role and relationships. With the rise of authoritarianism in Xi Jinping's 'new era', China is asserting a national rejuvenation under the grand narrative of the 'Chinese dream'. Internationally, China and the United States are perceiving each other as competitors and threats, with the risk of either decoupling or confrontation on many fronts. Hong Kong,

the connector between China and the West previously, is being repositioned as a hotspot of geopolitics by forces external to the city itself. The national security law and the electoral system reform have been received with mixed reactions in the international community. Many nations view them as China's internal affairs and most have been prudent in reacting. The West's reactions—including accusations, criticism, and sanctions on the basis of advocating democracy, freedoms and human rights—have attracted counter-reactions from the governments of Hong Kong and China, claiming double standards, hypocrisy and interference. The China–West difference and confrontation with regards to Hong Kong during and after the 2019 street movement would instantly remind many people in (Mainland) China of Deng Xiaoping's prophecy about 'destructive forces' made in the 1980s; Western responses have simply bolstered the central government's commitment to top-down intervention in Hong Kong affairs, which was emphasised by Deng Xiaoping in his initial notions about 'one country, two systems'.

The Chinese discourse and the Western discourse about Hong Kong and 'one country, two systems' are not necessarily in stark contrast. For the Chinese discourse, the central notions are national unification and security, and Hong Kong's 'prosperity' and 'stability'; in the Western discourse, such terms as democracy, freedoms and human rights express the central concerns about the Hong Kong situation. These two sets of discourse could have established some sort of dialogue and shared understandings if it were not for ideological differences and geopolitical confrontations between China and the West. Those 'good' notions in each discourse could be weaponised by each side when the broad circumstance would require them to do so. In the escalating confrontation between China and the United States (and the broader West) in many fronts, their discourses of Hong Kong are bifurcating, rather than converging, accusing each other of wrongdoing. For the West, the constitutionally legitimate national security law could be read as a threat to all those Western values in Hong Kong. For China, its definition of 'democracy' is surely different from the Western one, and serious discussions about 'democracy' in Hong Kong happened only after the colonial city's return to its motherland.

## Conclusion: Looking to the future

In its short history, 'one country, two systems' has been hotly contested in several crises before and after Hong Kong's return to China in 1997. Under a crisis-transformation logic, every crisis in the end has led to a new set of organising principles that has redefined and thus transformed 'one country, two systems' (So 2011). The severity of the 2019 street movement, along with the rise of China and its more recently strengthened authoritarianism and nationalism, and the new geopolitical context, have all shaped the scale of transformation that has followed the crisis. But the national security law and the electoral system reform might not be the only transformation. They could usher in a series of further systematic, long-term transformations to Hong Kong. 'One country, two systems' is being reconstructed through reinterpreting the policy and redesigning the institution, shifting a previous preference towards 'two systems' to an asserted focus on 'one country'. The principal contradiction within the policy determines that it has had to be constructed and reconstructed in different contexts. Today's context is fundamentally different from when the policy was first initiated and made, and so too are the policy's interpretation, institutionalisation and operationalisation.

Currently, the dominant discourse within the Mainland is that 'one country, two systems' is shifting from a *passive* mode to an *active* mode, and Hong Kong is experiencing its 'second return' to China. The central government's resolute and forceful intervention was triggered by the 2019 street movement. But it has strategically drawn upon reflections on Hong Kong's bumpy road after its return and on the governance and policy failures at both the central government and the SAR government levels under 'one country, two systems', an experimental policy design itself.

What will be the future of Hong Kong and 'one country, two systems'?

What happened in 2019 may not happen again. The central government, on several strategic occasions, has committed to strengthening the governance capacity, rejuvenating the economy and enhancing the livelihood of residents in Hong Kong. It is anticipated that the central government will support the SAR government, with delegated policy tools and state resources, to address the political division and resultant governance ineffectiveness, and the enlarging economic inequality and enduring social problems. These structural problems have inflicted the city for a long time and have not attracted adequate attention in a city that has inherited

a 'capitalist' tradition of small government and a free market. These problems are major contributors to the series of street movements—at least as commonly perceived in the Mainland. Hong Kong will inevitably be further integrated in the regional development of the Greater Bay Area and the national development system, a process that had begun before 2019. At the same time, the city that had been under the British rule and part of the Western world for one and a half centuries will be decolonised and de-geopoliticised—a process that has already begun, explicitly, after 2019. These processes are being boosted and 'legitimised' by a surging nationalism and pride in a 'China model', which is intentionally differentiated from, and declared to be superior to, the 'Western model' in the new narrative of Xi Jinping's 'new era' and 'Chinese dream'.

Hong Kong's 'prosperity' and 'stability' will continue to be the keywords and primary policy goals of 'one country, two systems', in rhetoric and in practice. The Western discourse of Hong Kong's democracy, autonomy and freedoms have rapidly escalated during and after the 2019 street movement, lamenting the undermining of them by the central government's intervention into Hong Kong affairs to justify those geopolitical reactions and linking them to other authoritarian measures taken by Xi Jinping. The Chinese discourse and the Western discourse—both are normative, value-laden and stance-based—are not necessarily incompatible, but are open to interpretation, manipulation and leverage. It is the growing political and ideological differences that have instrumentalised and weaponised these discourses in the geopolitical conflicts and confrontations between China and the West and the propaganda of each. These discourses are likely to continue to bifurcate, as will the readings and interpretations of Hong Kong and 'one country, two systems', at least before China and the West could figure out a way to cope with their differences. Despite these, both the city and the policy will move on—being constructed and reconstructed in contexts and by forces that are often external to the city. Hong Kong, a city that people have attached various perceptions and emotions to, is being remade into a city that is surely different from what it used to be.

## References

- Chan, Chi Kit (2018). 'Undoing China's charm offensive: Chinese tourists in Hong Kong's news discourses (2003–2015)', in Brian C.H. Fong and Tai-Lok Lui (eds), *Hong Kong 20 years after the handover: Emerging social and institutional fractures after 1997*, Palgrave Macmillan, Cham, Switzerland. doi.org/10.1007/978-3-319-51373-7\_12.
- Chan, Roger C.K. (2011). 'Hong Kong's position in Guangdong under "one country, two systems"', *Seoul Journal of Economics* 24(2):125–50.
- Chen, Bing'an (2010). *Grand flee to Hong Kong [da tao gang]*, Guangdong People's Publisher, Guangzhou.
- Chen, D. (ed.) (2019). *40-year reform and opening-up and Hong Kong [gai ge kai fang si shi nian yu xiang gang]*, Joint Publishing, Hong Kong.
- Country Economy (2020). 'Country comparison Hong Kong vs Singapore', Country Economy website. Accessed 30 December 2020]. Available at: [countryeconomy.com/countries/compare/hong-kong/singapore?sc=XE34](http://countryeconomy.com/countries/compare/hong-kong/singapore?sc=XE34).
- Deng Xiaoping (1993). *Selected works of Deng Xiaoping* (vol. 3) [*deng xiao ping wen xuan (di san juan)*], People's Publishing House, Beijing.
- Duhalde, Marcelo (2018). 'A tale of two cities: Shenzhen vs Hong Kong', *South China Morning Post*, 4 December 2018. Accessed 30 December 2020. Available at: [multimedia.scmp.com/news/china/article/2176135/shenzhen-hongkong/index.html](http://multimedia.scmp.com/news/china/article/2176135/shenzhen-hongkong/index.html).
- Gwartney, James, Robert Lawson, Joshua Hall and Ryan Murphy (2019). *Economic freedom of the world: 2019 annual report*, Fraser Institute, Vancouver.
- Hong Kong Tourism Board (2020). 'Visitor arrivals', Hong Kong Tourism Board website. Accessed 9 January 2021. Available at: [www.discoverhongkong.com/au/about-hktb/news/visitor-arrival.jsp](http://www.discoverhongkong.com/au/about-hktb/news/visitor-arrival.jsp) (site discontinued).
- Hong Kong Trade Development Council (2020). 'Economic and trade information on Hong Kong', *HKTDC Research*. Accessed 18 February 2021. Available at: [hong-kong-economy-research.hktdc.com/business-news/article/Market-Environment/Economic-and-Trade-Information-on-Hong-Kong/etihk/en/1/1X000000/1X09OVUL.htm](http://hong-kong-economy-research.hktdc.com/business-news/article/Market-Environment/Economic-and-Trade-Information-on-Hong-Kong/etihk/en/1/1X000000/1X09OVUL.htm).
- Hu, Richard (2013). 'Drivers of China's urbanisation and property development', *Australasian Journal of Regional Studies* 19(2):156–80.

- Lui, Tai-Lok (2015). 'A missing page in the grand plan of "one country, two systems": Regional integration and its challenges to post-1997 Hong Kong', *Inter-Asia Cultural Studies* 16(3):396–409. doi.org/10.1080/14649373.2015.1069053.
- Party Literature Research Centre of the CPC Central Committee (2004). *A chronicle of Deng Xiaoping (1975–1997) [deng xiao ping nian pu]*, Party Literature Research Press, Beijing.
- Podger, Andrew, Michael Woods and Tsai-tsu Su (2020). 'The immense and continuing challenge of urban governance: Developments in Australia and across Greater China', *Australian Journal of Social Issues* 55(2):105–24. doi.org/10.1002/ajs4.111.
- Scott, Ian (2017). "'One country, two systems": The end of a legitimating ideology?', *Asia Pacific Journal of Public Administration* 39(2):83–99. doi.org/10.1080/23276665.2017.1325619.
- Shen, Jianfa (2008). 'Hong Kong under Chinese sovereignty: Economic relations with Mainland China, 1978–2007', *Eurasian Geography and Economics* 49(3):326–40. doi.org/10.2747/1539-7216.49.3.326.
- Sin, Noah (2019). 'Explainer: How important is Hong Kong to the rest of China?', *Reuters*. Accessed 31 December 2020. Available at: [www.reuters.com/article/us-hongkong-protests-markets-explainer/explainer-how-important-is-hong-kong-to-the-rest-of-china-idUSKCN1VP35H](http://www.reuters.com/article/us-hongkong-protests-markets-explainer/explainer-how-important-is-hong-kong-to-the-rest-of-china-idUSKCN1VP35H).
- Smart, Alan and George Lin (2004). 'Border management and growth coalitions in the Hong Kong transborder region', *Identities: Global Studies in Culture and Power* 11(3):377–96. doi.org/10.1080/10702890490493545.
- So, Alvin Y. (2011). "'One Country, Two Systems" and Hong Kong–China national integration: A crisis-transformation perspective', *Journal of Contemporary Asia* 41(1):99–116. doi.org/10.1080/00472336.2011.530039.
- State Council (2019). 'Outline development plan for the Guangdong–Hong Kong–Macao Greater Bay Area [yue gang ao da wan qu fa zhan gui hua fang yao]'. Accessed 6 January 2021. Available at: [www.gov.cn/zhengce/2019-02/18/content\\_5366593.htm#allContent](http://www.gov.cn/zhengce/2019-02/18/content_5366593.htm#allContent).
- Vogel, Ezra F. (2011). *Deng Xiaoping and the transformation of China*, The Belknap Press of Harvard University Press, Cambridge and London.



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