

CONFLICTING PERSPECTIVES ON HONG KONG'S 2019 PROTESTS

NABILA JAFFER*

Abstract

The different system of Hong Kong within China came under increasing international scrutiny following the massive protests, which started in June 2019. The diverging perspectives on the scale and purpose of the protests emerged as another area of conflict between the Chinese and the Western media. Initially, the protests started against the Chief Executive's move on the extradition bill, which the people of Hong Kong feared would be used against the dissidents. The protests rocked the city with growing clashes and violence between the protesters and Hong Kong police. International media reported excessive use of force against protesters by the Hong Kong government on the instructions of Beijing. However, mainland China rejected the claims of excessive use of force as well as the strength of the protests in Hong Kong. China attempted to project them as dissent fomented by the rival countries targeted at China's unprecedented rise. The disturbing images of the protests shown by international media with people in hundreds of thousands on the streets with placards presented a different view. This paper focuses on the dichotomy in the perspectives on Hong Kong's protests in light of the ongoing power competition and propaganda war between China and the United States. It also attempts to explore the actual problem through a legal analysis of China's One Country, Two Systems.

* Ms Nabeela Jaffer is a Research Analyst at the Institute of Regional Studies, Islamabad.

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Introduction

The trade war, rising tensions in the South China Sea, the growing US defence ties with Taiwan, and its support for Hong Kong protests manifested a fierce competition between China and the US. America's enduring military footprint in the Asia Pacific has instigated China to build a new regional order in Asia.¹ The US has declared China as the biggest challenge to its strategic interests in the Asia Pacific region in its 2017 National Security Strategy.² The violent protests in Hong Kong, triggered by an extradition bill in May 2019, were painted as a pro-democracy and pro-independence struggle by the Western media. China presented a different view and this dichotomy in the perspectives on the Hong Kong issue emerged as a new irritant in the relations between China and the US.

The US opposition to China's rise is both ideological and strategic. It strongly opposes the Chinese Communist Party (CCP)-led governance system and China's global economic ambitions under the leadership of President Xi Jinping. China's policies under Mao Zedong were protective and cautious of any foreign influence. China under Xi Jinping has become more assertive in protecting the country against any foreign interference. After the dismissive attitude of Taiwan's current leadership, China has become more vocal and vigilant about its 'one China policy'.

Unlike Taiwan which maintains a separate independent democratic system, Hong Kong enjoys its unique status within China. Hong Kong is governed under China's 'one country, two systems' (1C2S) principle, which was adopted on the return of Hong Kong to China on 1 July 1997 after being under British control for 150 years. The agreement gives Hong Kong the status of a Special Administrative Region (SAR) for 50 years until 2047 as a 'bond agreed between Britain

and China'.³ The 1C2S offered Hong Kong "a high degree of autonomy" with a separate executive, legislative, and judicial system.⁴ Therefore, the people of Hong Kong strongly resisted the later withdrawn Extradition Bill, moved by Chief Executive Carrie Lam in the Legislative Council for approval, according to which criminals could be sent to mainland China for legal trial. It was considered an erosion of the judicial independence of this SAR region. It triggered massive protests in Hong Kong in June 2019, which continued for months. These protests got worldwide media attention with a focus on the surge in anti-Communist party dissent in Hong Kong. This provided an opportunity for the US to view the growing discontent and frustration among Hongkongers as beyond the recent extradition bill resistance and an extension of the failed protests of 2014, which was portrayed as a pro-democracy movement by the Western media.⁵ The leading figure of those protests was a student leader Joshua Wong who is still popular in the Western media projections of pro-democracy camp in Hong Kong.

The police force of Hong Kong faced severe criticism for the use of excessive force against the protesters, which further complicated the situation on the ground. Consequently, taking advantage of the situation, the protesters not only demanded a complete withdrawal of the extradition bill but put forward other demands including an 'independent inquiry' into the police brutality, 'release of the protesters', 'stopping the use of the word riots for the protests', and fulfilling the promise of 'democratic system through free and fair elections'.⁶ The coronavirus pandemic quietened the protests. To prevent such violent agitation in future, however, China passed the Hong Kong Security Law on 30 June 2020.⁷

The stakes involved for mainland China in this matter were not just the falling economic growth of Hong Kong but the threat it posed to its national security and stability. China's concerns increased over the rising political discontent and disconnection of the young

generation in Hong Kong with mainland China. What alarmed the central government was the growing concern among the young generation in Hong Kong about their political future than the weakening economic conditions of the city through the negative impact of the continuous violent protests.

To make it more attractive for public consumption, the mainstream Western media "focused on the US version of human rights and democracy vis-à-vis Hong Kong."⁸ The US Senate passed Hong Kong Human Rights and Democracy Act of 2019 on 19 November 2019. This act strengthened China's argument about the US involvement in fuelling political instability in Hong Kong.⁹ China argued that the continuity of protests despite the withdrawal of the extradition bill was evidence of foreign interference. Chinese media mainly reported the violence committed by protesters and called the Western media's reporting on Hong Kong 'partisan and biased' for only presenting a one-sided view. China complained that the Western media did not report the plights of police officers who risked their lives and faced gruesome violence.¹⁰

External commentators gave different views on the roots of problems in Hong Kong. Some found the problem in the current CCP leadership under Xi Jinping for his more authoritarian tendencies. It is believed that the people's resentment was the outcome of the growing control of Hong Kong's politics by mainland China. The government in place in Hong Kong is viewed as a client to mainland China. They also believe that China's response was aggressively defensive because the crisis in Hong Kong posed a challenge to Xi Jinping's authority.¹¹ Others argue that Britain had instilled Western concepts among the people of Hong Kong before handing it over to China, which made them feel more connected to the Western democratic values than with their Chinese values. On the other hand, the Chinese media and government viewed the Hong Kong protests as a result of economic grievances. The rising housing prices and

unemployment in Hong Kong were considered the main reason for resentment. Mainland China used the term riots for the violent demonstrations in Hong Kong and blamed the violent protests on foreign forces aimed at obstructing China's development.¹² Keeping in view these contending viewpoints on Hong Kong, this paper adds a new dimension to the debate on the flaws in Hong Kong's ruling document under the 1C2S as responsible for the 2019 protests.

Conflicting Perspectives:

Western Media	Chinese Media
<ul style="list-style-type: none"> • Western media compared the Hong Kong issue with the Tiananmen Square incident • Hong Kong administration was condemned for using excessive use of force • The protests were called pro-democracy movement and anti-authoritarian, anti-China • The protests were referred to as based on identity and ideology 	<ul style="list-style-type: none"> • Hong Kong enjoyed more freedom than before • Protests were incited by foreign forces • Unaffordable housing and unemployment were the root causes of dissatisfaction • A significant proportion wanted an end to the disorder and chaos in Hong Kong

Western Perspective

Western media recorded the 2019 mass demonstration as “one of the largest in the city's history and a stunning display of rising fear and anger over the erosion of the civil liberties”¹³ This mass demonstration was the result of Beijing's pressure on Hong Kong since the failure of the Umbrella Movement in 2014, *The New York Times* reported.¹⁴ This narrative promoted the cause of the pro-democracy camp in Hong Kong.

According to the Western perspective, Hong Kong protests were the result of the growing anger among the Hong Kong residents on the tightening control measures of the city by the Chinese central government for over the years which was promised 'a high degree of autonomy'. As per this narrative, the protests were a reaction to the eroding freedom of speech, judicial independence, and political rights. The Western media maintained that the people protests happened because "China had greatly underestimated the value Hong Kong's people attached not solely to prosperity, but to freedom."¹⁵

Four incidents were highlighted as the reasons for the growing discontent among the Hongkongers.

1. The release of a 'white paper' in June 2014 in which the central government made it clear that the 'high degree of autonomy' had been authorised by the central leadership, therefore, Beijing had a comprehensive jurisdiction over the city.
2. People's resentment against Beijing's refusal to introduce 'universal suffrage' in Hong Kong in 2014, which resulted in the Umbrella Movement. China's nomination of a Chief Executive of their choice through a pro-Beijing nominating committee of 1,200 members was considered a blow to the people's aspirations.¹⁶
3. People's resentment exacerbated when six pro-democracy lawmakers were removed and pro-independence candidates were restricted from contesting elections. The Western perspective called it a successful attempt of the Hong Kong government to weaken the pro-democracy camp and to discourage the unpopular policies in the legislature.
4. Another major reason for the agitation among the Hong Kong people as noticed by the Western media was Beijing's integrative policies, moral and national education

(MNE) system, and the infrastructure projects "including a bridge linking Hong Kong, Macau and southern China and a high-speed rail link to China."¹⁷

While promoting the urge for democracy in Hong Kong, the Western media propagates that a new generation born after the handover of Hong Kong to China does not subscribe to the Chinese system of governance. "Many are descended from parents or grandparents who fled Communist repression in China. They describe themselves not as Chinese but as Hongkongers. They are the vanguard of Hong Kong's protests, and many say they are prepared to die for freedom."¹⁸

Western analysts widely believed that years of accomplice behaviour of the Hong Kong administration towards Beijing alienated Hongkongers from mainland China. The researcher of Sciences-Po in Paris Mr Jean-Philippe Béja went on to say that Hongkongers perceived their protests as a revolution and liberation movement which posed a severe challenge to "Xi Jinping's rhetoric of greatness."¹⁹

Moreover, Western scholars rejected Chinese claims that there were economic reasons behind the protests. Rather they argued that the reasons for the growing discontent among Hongkongers were political and ideological.²⁰ Western media also promoted this idea that mainland China and Hong Kong have a complete "opposite set of values such as democracy, rule of law and basic human rights."²¹

The Western media also claimed that the people in mainland China continued to condemn the protests in Hong Kong because the people were unaware of the actual reasons, as their only source of information was Chinese media which was excessively controlled and censored by the central government.²²

Chinese Perspective

Chinese media came up with a strong rebuttal to Western media claims. Lawrence Tang Fei, a member of the Chinese

Association of Hong Kong and Macao Studies, stated in an expert interview with *Global Times*, "Since its return to the motherland, Hong Kong has further expanded the extent of political freedom, democratic rights and implementation of the rule of law; while when Hong Kong was under the British colonial rule, the governors were entitled to absolute power over execution, legislation and jurisdiction."²³

China's major dailies condemned the violent protests in Hong Kong. China claimed that rioters were encouraged by the US interference. Criticising the 'Hong Kong Human Rights and Democracy Act of 2019' of the US, China termed it as "an attempt to whitewash the violent acts, support the radical protesters and interfere in the internal affairs of China."²⁴

China continued to present the crimes committed by the rioters by destroying and smashing buildings, train stations, and airports using petrol bombs, disabling public transport, besieging universities, attacking police officers, and innocent citizens. China reminded the US that such kind of riots trampled on the rule of law and endangered the life and property of the masses, which was also a violation of human rights. China defended its measures by arguing that "not one single country in the world could tolerate such horrible crimes in the name of democracy."²⁵ Therefore, stopping violence and chaos was wished by the people of Hong Kong, China claimed.²⁶ "More and more Hong Kong citizens have stepped up efforts to clear the roadblocks and support the police to resist the violent protesters and false democracy."²⁷

China censured the US for its disregard for global justice by promoting violence and distorting facts in Hong Kong "under the guise of human rights and democracy."²⁸ Chinese media quoted journalists from abroad who considered the US bill on Hong Kong as deliberate meddling in China's internal matters. Tom Fowdy, a scholar with Oxford University, called the "Hong Kong Human Rights and Democracy Act of 2019 as an attempt of the US to manipulate Hong Kong for its own diplomatic purposes and benefits."²⁹ In an interview

with *Global Times*, Chinese citizens also criticised the US for maligning the Chinese government to contain China's development. The Hong Kong society was plunged into chaos and the US bill was aimed to instigate violent riots, they argued.³⁰

Chinese media responded through expert interviews maintaining that the new generation born after the "return of Hong to the motherland in 1997, [had] no experience of living under the colonial rule, and it [was] ridiculous for them to think that the Hong Kong people were given more freedom and democracy in the colonial era."³¹

China's officials also made it clear that the unique economic system Hong Kong was enjoying was also supported by China through its mini Constitution, the Basic Law, and 1C2S principle.³² The former Chief Executive of Hong Kong Leung Chun-Ying had warned the Hongkongers in 2017 that the 50-year bond for autonomy as assured by Basic Law was aimed to maintain the capitalist system of Hong Kong. Beijing's sovereignty over the city would remain the same before and after the end of the bond, he stated.³³

Wang Zhenmin, a former Tsinghua University Law Dean, also warned the separatists against confronting and damaging the 'one country' through its 'two country' part. The maximum autonomy Hong Kong enjoys is authorised under Article 2 of the Basic Law but "Wang warned that room for that autonomy could shrink if Hongkongers continued to challenge national security."³⁴

China defended its 1C2S setting by presenting the extraordinary development of Macau and its social harmony during the past 20 years. China called this political setting the best endeavour for the peaceful reunification of China.³⁵

China's 1C2S Concept

The idea of 1C2S was first coined by Deng Xiaoping in 1978, which was originally meant for the reunification of Taiwan. When China got independence in 1949, historically the three Chinese

territories of Taiwan, Macau, and Hong Kong remained outside of the control of the Communist Party Government. After the Communist Party victory, the 'defeated nationalist army' was sent into exile to Taiwan. Taiwan retained an independent democratically elected government but China considers it its province. Under this system, Deng had promised a 'high degree of autonomy' to Taiwan. Later, this arrangement became a constitutional principle for describing the governance of Hong Kong and Macau.³⁶

Hong Kong is different from mainland China in various aspects including language as well as the political and economic system. "Hong Kong uses traditional Chinese characters, while mainland China uses simplified ones. Hong Kong has two official languages: English and Chinese—or Cantonese to be more exact, which is a dialect that is only spoken and understood in southern China."³⁷ Apart from enjoying the freedom of press and opinion and freedom of assembly, the people of Hong Kong are allowed to cast vote despite the nomination of candidates by mainland China. Along with the capitalist economic system, Hong Kong also enjoys private property ownership and real estate business as against the state ownership of properties in mainland China.³⁸

The 1C2S 50-year arrangement as a separate system within China was adopted as an effective instrument to preserve the national stability and also the capitalist economic system of Hong Kong. Deng Xiaoping planned to give sufficient time to the natives of Hong Kong to get used to the Chinese political system. China did not suddenly alter the political and economic order established by the British but the formula of 1C2S was aimed to "ensure the gradual integration of Hong Kong and Macao into its sphere of governance."³⁹ The joint declaration between Britain and China promised that Hong Kong as an SAR would be administered by the local people. Universal suffrage was mentioned in Hong Kong's Basic Law for electing the Chief Executive, which is a mini Constitution of this region derived from the

declaration. Giving this example, some Chinese scholars call this commitment a mistake which "shows it was Beijing that initiated the wave of democratisation in Hong Kong in the mid-1980s."⁴⁰

While the citizens of Hong Kong were waiting for the fulfilment of the promise of giving them the right of universal suffrage, China accelerated its economic, cultural, and political integration of the city. Some factions in Hong Kong viewed this "attempt on Beijing's part to do so a fundamental infringement upon their core liberties and autonomy."⁴¹ The anti-extradition bill protests revealed polarisation in Hong Kong's society on their political status. On the one extreme, some individuals want the immediate absorption of Hong Kong into mainland China's political system. Others believe in the distinct identity of Hong Kong and see the solution to their various problems in its independent political system. They view most of the problems as associated with the increasing influence of Beijing in the governance system of the city, which was promised an autonomous system under 1C2S.⁴² There is also a group of people who want complete independence mostly reported by the Western media.

Controversy over the Extradition Bill

Hong Kong was given an independent judicial system under a special section in the joint declaration.⁴³ Article 63 is central to the 'judicial autonomy' of Hong Kong. This article states, "The Department of Justice of the Hong Kong Special Administration Region shall control criminal prosecution, free from any interference."⁴⁴ Therefore, the extradition bill was considered as the deferment of the independent judicial system of Hong Kong before its 50 years term.⁴⁵ However, the actual problems can be attributed to the system of 1C2S with which the people of Hong Kong were showing dissatisfaction for quite some time. The 2014 Umbrella Movement or pro-democracy movement is presented as evidence.⁴⁶

The pretext for the extradition bill was the killing of a 20-year-old pregnant woman at the hands of her boyfriend who allegedly

murdered her in Taiwan in February 2018 and came back to Hong Kong. Technically Hong Kong authorities could not hand over the fugitive to Taiwan due to the lack of extradition agreement between the two regions. It was not just the case with Taiwan but the existing extradition law in Hong Kong does not apply to the central government or any other part of China.⁴⁷ However, the intended extradition bill was aimed to entertain such requests for fugitives in future from Taiwan as well as mainland China and Macao.

The Hong Kong Chief Executive Carrie Lam failed to win public confidence despite removing several “commercial offences such as tax from the list of extraditable offences” and giving final say on extradition requests to Hong Kong courts. Even suspects accused of political and religious crimes were excluded from such extraditions. Most importantly, the government promised that this law would be used for handing over “fugitives for offences carrying maximum sentences of at least seven years.”⁴⁸ Even then the protests continued and people feared the extradition bill would be used for suppressing the dissent through “arbitrary detention, unfair trial and torture under China’s judicial system.”⁴⁹ Some people looked at this from a human rights perspective. “The proposed changes to the extradition laws will put anyone in Hong Kong doing work related to the mainland at risk. No one will be safe, including activists, human rights lawyers, journalists, and social workers,” said Human Rights Watch’s Sophie Richardson.⁵⁰

The most quoted example for mainland China’s treatment of dissent was the abduction of a Hong Kong bookseller named Lam Wing Kee. He was detained in China in 2015 for defaming Chinese leadership through books. In April 2019, Lam fled to Taiwan.⁵¹ “If I don’t go, I will be extradited,” Lam said during a protest against the bill. “I don’t trust the government to guarantee my safety, or the safety of any Hong Kong resident.”⁵² Lam still gets highlighted in international media for his continued defiance against the leadership in Beijing. After a year, he reopened his bookshop in Taiwan with the

help of funds from his supporters.⁵³

According to independent media reports, this extradition bill faced opposition from all forms of social strata in Hong Kong ranging from lawyers to housewives. The youth from schools and universities especially registered their strong opposition against this bill. The opposition to the extradition bill from Western countries further emboldened the protesters. A US Congressional Commission condemned the proposed changes in the autonomous judicial system of Hong Kong and warned about the political coercion through eroding the city's autonomy. Similarly, Britain, Canada, and European Union opposed the proposed changes in the legal system expressing concerns over its negative impact on their citizens in Hong Kong.⁵⁴

China rejected such views and called them interference in China's internal matters. Having said that, it is important to understand the legal grounds that give China the power to offset any secessionist agenda from within Hong Kong or injected by external forces.

China's Position

China argued that Hong Kong has been treated very well with its economic and administrative autonomy. Hong Kong was not only allowed to function under the capitalist economic system but also enjoyed many economic leverages under 1C2S. Mainland China exempted Hong Kong from the obligatory "taxes and fees that other Chinese provinces and municipalities pay the central government."⁵⁵ Moreover, China has allowed Hong Kong's entry into the mainland's stocks and currency markets along with ensuring all facilities, including water, electricity, gas, and food. However, China attributes the growing disaffection among Hong Kong's residents to Western influence.⁵⁶

According to China, the concept of 1C2S was meant for the gradual integration of Hong Kong governance to mainland China. It was never intended to make it secede from the mainland.⁵⁷ China defends its position legally by quoting the Basic Law. This law not only

empowers Beijing to prevent any challenge to its sovereignty but also enjoys the authority to determine the time and the condition for allowing universal suffrage. Moreover, the written law also gives China the discretion to approve or turn down any law passed by the Hong Kong Legislative Council in addition to the discretion of the “final interpretations of the Basic Law.”⁵⁸

The Basic Law in its Article 45 states, “The ultimate aim is the selection of Chief Executive by universal suffrage upon nomination by a broadly representative nominating committee in accordance with democratic procedures.”⁵⁹ But it has also been mentioned in the same article that “the method for selecting the Chief Executive shall be specified in the light of the actual situation in the Hong Kong and in accordance with the principle of gradual and orderly progress.”⁶⁰ The growing Western influence on the political views of the youth in Hong Kong gave China a reason to present the situation as not suitable for implementing the democratic process. The pro-independence factions in the protests holding the US flags in their hands not only angered China but also spoiled the mission of the majority who wanted to preserve the greater autonomy of Hong Kong under 1C2S.



Peoplesworld.com

The central government exercises such powers of interpretation of the right situation for the democratic process in Hong Kong in the domain of sovereignty. The legal document called the Hong Kong Basic Law provides autonomy to the region but under the condition of preserving China's territorial sovereignty. It is mentioned very clearly in "Article 1 of the basic law that Hong Kong is an inalienable part of China."⁶¹ In Article 2 it is mentioned that the "National Congress authorizes Hong Kong to exercise maximum autonomy."⁶² Articles 4 and 5 give the guarantee of freedom to the citizens of Hong Kong according to the law and prevents the region from practising a socialist system and policies by retaining the previous capitalist system for 50 years. Having observed China's position, it is important to understand why the people of Hong Kong linked the extradition bill to the erosion of the city's autonomy that is promised to them for 50 years under the 1C2S declaration. Moreover, it is also important to understand why the peaceful protests turned violent. These points could be understood through analysing flaws in the legal document of 1C2S.

Flaws in 1C2S

Article 28 of the Basic Law states, "The freedom of the person of Hong Kong resident shall be inviolable. No Hong Kong resident shall be subjected to arbitrary or unlawful arrest, detention or imprisonment."⁶³ These kinds of provisions are unique in Hong Kong because they are not practised in the mainland. China's growing apprehensions over the assembly and violent protests and the use of force against the protests was a deviation from the abovementioned article. The clash comes over this matter between the two perspectives: the way China viewed the protests and the way it was projected by the Western media and also by the pro-freedom news agencies in Hong Kong. China used the word riots for the protests and also gave the

impression that the protesters did not represent the views of the majority.

The resistance against the extradition bill can be related to Article 19, which gives it an "independent judicial power, including that of final adjudication."⁶⁴ An independent judiciary is considered an integral part of the preservation of the autonomous system in Hong Kong. This display of contempt by the people of Hong Kong against aligning its legal system with mainland China shows their lack of trust in the fairness of justice in mainland China. This also gave China the reason to critically examine the flaws in 1C2S. Under the principle of maximum autonomy, Basic Law gives Hong Kong freedom of displaying its flag and emblem.⁶⁵ This provides Hong Kong people with an opportunity to craft a nation within a nation blended in Western values and Han Chinese values. Voicing aggressively against the extradition bill also shows the element of aspiration for the continuation of an independent and autonomous system. The new generations of Hong Kong do not associate themselves with the system in mainland China.

The Basic Law, under Article 27 in chapter III, states, "Hong Kong residents shall have freedom of speech, of the press and publication, freedom of association, of assembly, of procession and of demonstration and the right and freedom to form and join trade unions and to strike."⁶⁶ The people of Hong Kong consider this freedom necessary for their aspirations to achieve universal suffrage promised to them. The Article about freedom of expression and freedom of assembly is considered the core of the autonomous system of Hong Kong. The younger generation exercised this right of freedom of expression and assembly aimed at reinforcing the principles of the autonomous status of this region. Therefore, the use of force and resistance by

the police in Hong Kong sparked further outrage among the youth in this region.

Furthermore, the controversial Article 23 Chapter II, which was supposed to be approved and enacted by the Hong Kong administration as its own law was aimed to limit any threat to national security. This article was "to prohibit any act of treason, secession, sedition, subversion against the people's government, or theft of state secrets, to prohibit foreign political organizations or bodies of the region from establishing ties with foreign political organizations or bodies."⁶⁷ Hong Kong administration attempted to introduce this article in 2003 but then dropped it due to a substantive public backlash. China considered this law important to defend China from any secessionist movement in case it introduces universal suffrage. The residents of Hong Kong did not understand the purpose of this law and instead developed a hostile view of Beijing for showing reluctance to give them their rightful political freedom.⁶⁸

Article 23 and Article 27 were in sharp contradiction, which shows the gaps in the concept of 1C2S. Article 27 empowered the local people, which make them exceptional from mainland China. On the other hand, Article 23 could give arbitrary powers to the SAR administration.

The extradition bill protests led the central government to introduce national security laws on 30 June 2020 as a substitute to Article 23 that will provide a legal framework to deal with threats to its authority. The law is meant to criminalise "any act of:

- secession - breaking away from the country
- subversion - undermining the power or authority of the central government

- terrorism - using violence or intimidation against people
- collusion with foreign or external forces⁶⁹

According to experts, this new law will effectively curtail any chances of dissent in future.⁷⁰

The election of the Chief Executive in Hong Kong is also considered a flaw in the 1C2S. The election of the Chief Executive takes place through a 1,200-member committee with the final approval of the Chinese government over the condition of patriotism to the mainland, which the people of Hong Kong think is also in contradiction to the promised autonomous political system. This condition makes the Hong Kong administration subservient to the desires of CCP leadership instead of making them answerable to Hong Kong's public.⁷¹

Thus, the selection of the Chief Executive exclusively in favour of the mainland's interests had caused the Umbrella Movement in 2014. In later years, in 2017, China also stepped up actions against the pro-democracy lawmakers. Therefore, the protests in 2019 were also connected to the people's resistance against the electoral system in Hong Kong, which they believe does not guarantee them autonomy under the basic concept of the SAR.⁷²

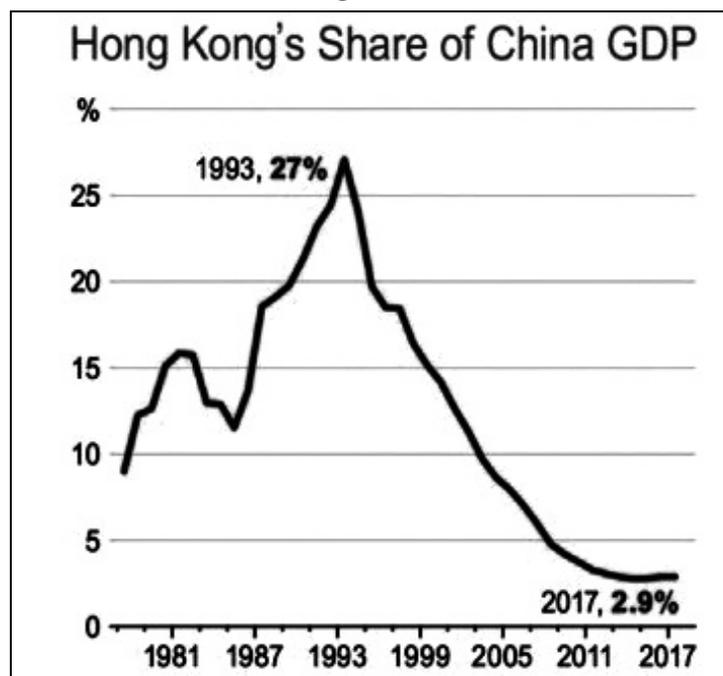
Analysis: Central Government vs SAR Hong Kong

To understand the actual problems and flaws in the 1C2S, it is important to analyse the inconsistency between the principle of autonomy of this SAR and the expectations of the central government in China.

The Economics Argument

China's central government maintained the same British-led capitalist system of economy in Hong Kong. Hong Kong was doing very well economically and the city continued to serve as a gateway to

China's financial transactions with global markets.⁷³ The Gross Domestic Product (GDP) of Hong Kong was around 20 per cent as against the size of the mainland economy in 1997 at the time of Britain's handover to China.⁷⁴ It was in favour of China to retain the economic system of Hong Kong because the British business law and the banking system helped attract foreign investments. Hong Kong was a golden goose for China. China not only benefited from the banking and trade of Hong Kong but also presented it as free.⁷⁵ Therefore, the central government was also ready to let a different political administration in this region.



Source: <http://www.ejinsight.com/20170609-hk-versus-china-gdp-a-sobering-reality/>

The rapid economic development of China and the rise of modern metropolitan business cities of China in the last 20 years, such as Shenzhen and Shanghai turned out to be attractive destinations for foreign investments. China also created 'free trade zones' for

stimulating the expansion of the national economy.⁷⁶ Against this backdrop, Hong Kong could not maintain its economic growth at the same pace. According to economic reports, "Hong Kong's economy relative to China's gross domestic product (GDP) has fallen from a peak of 27 percent in 1993 to less than 3 percent in 2017."⁷⁷ So, twenty years after the handover, "Hong Kong's GDP is equivalent to just 2.9 percent of China's economy."⁷⁸

Keeping this changed scenario in view, there's no comparative economic advantage for mainland China to tolerate the rising aspirations for maximum political autonomy in Hong Kong. Although the Hong Kong administration presented a strong reason for having an extradition agreement with the rest of the SARs and mainland China to avoid making this region a haven for fugitives. But the changed economic situation emboldened China to instigate the legal alignment of this SAR with the mainland through the extradition bill. According to Derek Grossman, "Beijing's soft sell to Taiwan and Hong Kong is falling apart."⁷⁹ Chinese President Xi Jinping in July 2017 at the 20th anniversary of the handover pledged to "unswervingly implement the policy of one country, two systems" in Hong Kong. But Grossman argues that "the protests against a controversial new extradition law mark only the most recent instance when the difference between Beijing's vision of two systems and Hong Kong's perspective has been exposed."⁸⁰

According to Western studies, the social unrest in Hong Kong has different reasons than the unrests that happened in France over an increase in oil price in 2018 and Chile over the increasing transport prices in 2019. The study finds that employment was full in Hong Kong and its performance in social progress was excellent. Hong Kong ranked at 4th in Human Development Index in 2018 out of 189 places under study, which showed it similar to Germany.⁸¹ According to these independent studies, Hong Kong was ranked as 3rd out of 162 countries in Human

Freedom Index.⁸² This study was a rebuttal of China's argument about economic reasons for growing agitation among the residents.

The Identity Argument

The residents of Hong Kong have created their own 'distinct identity' with the colonial era system.⁸³ The Hongkongers' perspective of the SAR can be gauged through their identity parameter. A major shift has been recorded in the Hong Kong residents' self-identification as Chinese or Hongkongers. The people of Hong Kong, originally Han Chinese, had chosen to live in this British colony under maximum autonomy which constructed their distinct identity over the years. Later, the new generation living under China's cautious proposal of 1C2S since 1997 further strengthened the local identity. Keeping in view, their association with Western values, the residents of Hong Kong view their society as freer and more developed than China. According to a study carried out by the Chinese University of Hong Kong, in 20 years after the handover, an increase has been recorded in their identity as Hongkongers. According to this study, 67.7 per cent of general residents identified themselves with the Hong Kong identity, a 'Hongkonger in China' was responded by 26.8 per cent and just 'Hongkongers' were counted as 40.7 per cent. Contrary to this, only 41 per cent of residents considered themselves Hongkongers in 1997.⁸⁴ This study further finds that, despite China's attempts of integrative policies through introducing patriotic education, 96.4 per cent of people under the age of 29 years called themselves Hongkongers. "Only 3.6 percent of the young people identified themselves as primarily Chinese, a stark contrast to the 31.6 percent recorded in 1997,"⁸⁵ the study concluded.



A pro-democracy demonstrator holds a sign reading "HK Is Not China" during a protest in the MongKok district of Hong Kong, China, on Tuesday, Oct. 1, 2019. Chan Long Hei/Bloomberg via Getty Images

Moreover, the study finds that a sharp decline has been recorded in 'the degree of confidence' that the public of Hong Kong has in 1C2S since 2014. "The degree of confidence is primarily dependent on whether people believe Hong Kong enjoys autonomy, free of Beijing's interference and irrespective of changes in Chinese Communist Party (CCP) leadership. This is tied to perceptions of whether Beijing will allow universal suffrage as provided for in Hong Kong's Basic Law."⁸⁶ The study finds that 63.6 per cent of people were confident about their political system in 1997, which has now dropped to 45.5 per cent. Conversely, the people who felt less confident about the system rose from 18.1 per cent to 49 per cent.⁸⁷ This downward spiral in the people's belief in 1C2S "inspires little confidence in nearby Taiwan" to consider this system, which was aimed for their peaceful reunification with mainland China.⁸⁸

According to experts, the declining public confidence in the autonomous system in Hong Kong is linked to the decline in the approval of the Chinese government. As long as the SAR was

working more for the interests of the locals, the people in Hong Kong had positive views about China and its own administration. But the situation changed with the 2009 Chinese plan of constructing a high-speed rail link with Hong Kong. As this project was accompanied by China's "customs and immigration law applied in parts of the terminal building symbolizing to protesters an encroachment upon Hong Kong's territorial rights."⁸⁹ Moreover, the increasing influx of Chinese pregnant women to Hong Kong for child birth burdened the availability of beds in the city's hospital, which gave the impression to the people that the city's autonomous administration was not sensitive to the needs of the locals. The Chinese government, however, is surprised by such reaction of the people of Hong Kong on the increasing linkages with the mainland calling it 'blatant ingratitude'. China expected the enormous Chinese investments and business opportunities in Hong Kong to be taken positively. This suggests that both Beijing and the locals in Hong Kong have different expectations from 1C2S. The reason for the increasing misunderstanding in their relationship is the contradiction in the interpretation of their grievances.⁹⁰

China believes that the increasing disapproval of the Chinese central government in Hong Kong is due to the gaps in communication and understanding. To address this issue, China started the Moral and National Education (MNE) programme in Hong Kong in 2012. Instead of bridging the gaps, this education programme faced strong resistance from the locals of Hong Kong. The people of Hong Kong considered it an unacceptable interference of the Chinese government violating the autonomous system. The overwhelming opposition to MNE compelled the government to withdraw this plan. According to Chinese scholar Brian Wong, 1C2S has failed so far to address the cultural and identity problems. Wong believes that "the MNE

controversy triggered the construction of a specifically Hong Kong identity that served effectively as the antithesis to the compromise "Hong Kong Chinese" identity that held sway before 2008."⁹¹ It is the inconsistency in the understanding and expectations from 1C2S that can trigger massive opposition in Hong Kong whenever the government takes any step that the locals of Hong Kong deem a violation of their autonomy. This was the reason that the extradition bill was considered a necessity by the government but the people viewed it as an attempt by Beijing to punish the dissidents.

Conclusion

The six-month-long violent protests in Hong Kong endangered the vision of a unified China. While the Western media showed the growing anxieties and anxiousness among the Hongkongers against China's tightening control in Hong Kong. China initially came up with a strong counter-narrative and later enacted its national security law to prevent any such violent demonstration in future. This divide in narrative required a legal analysis of Hong Kong's Basic Law, which lends it its autonomous status. The different expectations and different interpretation of 1C2S by the Hong Kong citizens and mainland China can be considered the root cause of the protests. The flaws in the legal document also led to frustration among Hongkongers. Besides that, the element of foreign interference can also be witnessed in fomenting pro-independence and pro-democracy camps among Hong Kong masses. The overwhelming projections of the pro-democracy camp by the Western media gave a new perspective to the protests, which led the Hong Kong administration to respond with force. Resultantly, the protests turned violent and the Western media again jumped in followed by a backlash from the Hong Kong Administration and the Chinese central government.

China emphasised the purpose of the autonomous system under the 1C2S which was meant to 'adapt and adjust to

circumstantial demands and needs' till the second handover in 2047.⁹² However, the strong reaction over the extradition bill showed different expectations of Hong Kong citizens who did not seem ready to adapt and adjust to the gradual integration with mainland China. The inherited cultural legacy from Britain, the capitalist system, and public liberty over decades created a different identity and a Hongkonger nationalism.⁹³ Therefore, for the people of Hong Kong, political autonomy was the assurance of their civil liberties and to make the Hong Kong administration answerable to their wellbeing. However, the one-sided view presented by the Western media and the projection of the protests as a pro-democracy movement greatly undermined the cause of the majority of Hong Kong citizens who wanted to save the judicial autonomy of the SAR region as promised under the Basic Law. The gaps in integrating Hong Kong on the cultural and identity line posed the biggest challenge to China. Because these gaps provided an opportunity for the US to support violent protests against China and provoke Beijing to aggressive action against the protesters to stigmatise it with another Tiananmen Square kind of incident. However, China showed maximum restraint in taking military action and instead only depended on the local administration to deal with the protests. However, the Covid-19 pandemic provided ample time for Beijing to pass the Hong Kong Security Law to permanently bar the misuse of freedom of opinion and assembly at the hands of foreign elements against the sovereignty of China.

Notes and References

- ¹ Richard McGregor, "Asia's Reckoning: China, Japan and the Fate of U.S. Power in Pacific Century," (New York: Penguin Random House, 2017) p. xvi.
- ² Congressional Service Report, "China-India Great Power Competition in the Indian Ocean Region: Issues for Congress," *Congress Report*, 20 April 2018, available at https://www.everycrsreport.com/files/20180420_R45194_3d4bf676130e76924f5fea6d2e54d3a78e2200a9.pdf.
- ³ Andrew J. Nathan, "How China Sees the Hong Kong Crisis, The Real Reasons Behind Beijing's Restraint", 30 September 2019, available at <https://www.foreignaffairs.com/articles/china/2019-09-30/how-china-sees-hong-kong-crisis>.
- ⁴ Hong Kong, "What is the Basic Law and how does it work?", 20 November 2019, available at <https://www.bbc.com/news/world-asia-china-49633862>.
- ⁵ James Palmer, "Why Is Hong Kong Erupting?," *Foreign Policy*, 3 August 2019, available at <https://foreignpolicy.com/2019/08/03/why-is-hong-kong-erupting-protests-china-extradition/>.
- ⁶ Wong Tsui-kai, "Hong Kong protests: What are the 'five demands'? What do protesters want?," 19 August 2019, available at <https://www.scmp.com/yp/discover/news/hong-kong/article/3065950/hong-kong-protests-what-are-five-demands-what-do>.
- ⁷ "Hong Kong security law: What is it and is it worrying?," *BBC*, 30 June 2020, available at <https://www.bbc.com/news/world-asia-china-52765838>.
- ⁸ Jia Wenshan, "HK protests expose Western media bias," *China Daily*, 23 November 2019, available at <https://www.chinadaily.com.cn/a/201911/23/WS5dd88b10a310cf3e35579721.html>.

- ⁹ Jia Wenshan, "HK protests expose Western media bias," *China Daily*, 23 November 2019, available at <https://www.chinadaily.com.cn/a/201911/23/WS5dd88b10a310cf3e35579721.html>.
- ¹⁰ JiaWenshan, "HK protests expose Western media bias," *China Daily*, 23 November 2019, available at <https://www.chinadaily.com.cn/a/201911/23/WS5dd88b10a310cf3e35579721.html>.
- ¹¹ Verna Yu, "They don't understand Hong Kong': clash of ideologies looms on China's 70th anniversary," *The Guardian*, 30 September 2019, available at <https://www.theguardian.com/world/2019/sep/30/they-dont-understand-hong-kong-clash-of-ideologies-looms-on-chinas-70th-anniversary>.
- ¹² JiaWenshan, "HK protests expose Western media bias," *China Daily*, 23 November 2019, available at <https://www.chinadaily.com.cn/a/201911/23/WS5dd88b10a310cf3e35579721.html>.
- ¹³ Austin Ramzy, "Hong Kong March: Vast Protest of Extradition Bill Shows Fear of Eroding Freedoms," *New York Times*, 9 June 2019, available at <https://www.nytimes.com/2019/06/09/world/asia/hong-kong-extradition-protest.html>.
- ¹⁴ Ibid.
- ¹⁵ Claudia Rosett, "A defiant stand for freedom: Hong Kong's struggle against tyranny and why it matters, The Social Order, Politics and Law," *City Journal*, 11 December 2019, available at <https://www.city-journal.org/hong-kong-struggle-against-tyranny>).
- ¹⁶ Verna Yu, "Rights under threat: how China is bringing Hong Kong to heel," *The Guardian*, 5 July 2019, available at <https://www.theguardian.com/world/2019/jul/05/rights-under-threat-how-china-is-bringing-hong-kong-to-heel>.
- ¹⁷ Ibid.
- ¹⁸ Claudia Rosett, "A defiant stand for freedom: Hong Kong's struggle against tyranny and why it matters, The Social Order, Politics and law," *City Journal*, 11 December 2019, available at

<https://www.city-journal.org/hong-kong-struggle-against-tyranny>).

- ¹⁹ Andreas Fulda, "Beijing Is Weaponizing Nationalism Against Hong Kongers," *Foreign Policy*, 29 July 2019, available at <https://foreignpolicy.com/2019/07/29/beijing-is-weaponizing-nationalism-against-hong-kongers/>.
- ²⁰ Verna Yu, "They don't understand Hong Kong: clash of ideologies looms on China's 70th anniversary," *The Guardian*, 30 September 2019, available at <https://www.theguardian.com/world/2019/sep/30/they-dont-understand-hong-kong-clash-of-ideologies-looms-on-chinas-70th-anniversary>.
- ²¹ Austin Ramzy, "Hong Kong March: Vast Protest of Extradition Bill Shows Fear of Eroding Freedoms," *New York Times*, 9 June 2019, available at <https://www.nytimes.com/2019/06/09/world/asia/hong-kong-extradition-protest.html>.
- ²² "Hong Kong mob — How mainland Chinese see the democracy movement," *DW*, 19 August 2019, available at <https://www.dw.com/en/hong-kong-mob-how-mainland-chinese-see-the-democracy-movement/a-50084621>.
- ²³ "Xinhua, US Congress' passage of Hong Kong-related act typical 'long-arm jurisdiction', says expert," *Global Times*, 28 November 2019.
- ²⁴ Zhong Sheng, "Vicious practice of U.S. will certainly be condemned by the international community," *People's Daily*, 28 November 2019, available at <http://en.people.cn/n3/2019/1128/c90000-9636217.html>.
- ²⁵ *Ibid.*
- ²⁶ Zhong Sheng, "To stop violence and chaos in Hong Kong is the popular will," *People's Daily*, 28 November 2019.
- ²⁷ Riyaz ul Khaliq, "US' Hong Kong act violates norms of int'l law: China," 15 October 2020, available at <https://www.aa.com.tr/>

en/americas/us-hong-kong-act-violates-norms-of-int-l-law-china/2007350.

²⁸ Zhong Sheng, "Vicious practice of U.S. will certainly be condemned by the international community," *People's Daily*, 28 November 2019.

²⁹ Ibid.

³⁰ "Xinhua, US Congress' passage of Hong Kong-related act typical 'long-arm jurisdiction', says expert," *Global Times*, 28 November 2019.

³¹ Interview, "US Congress' passage of Hong Kong-related act typical 'long-arm jurisdiction', says expert," *Global Times*, 28 November 2019.

³² Ibid.

³³ Jaffie Lam, "One country, two systems' for Hong Kong could be scrapped if it is used to confront Beijing, official says," available at <https://www.scmp.com/news/hong-kong/politics/article/2091747/one-country-two-systems-hong-kong-could-be-scrapped-if-it>.

³⁴ Jaffie Lam, "One country, two systems' for Hong Kong could be scrapped if it is used to confront Beijing, official says," available at <https://www.scmp.com/news/hong-kong/politics/article/2091747/one-country-two-systems-hong-kong-could-be-scrapped-if-it>.

³⁵ "Macao to firmly hold onto the great initiative of "one country, two systems" principle," *People's Daily*, 9 December 2019.

* China proposed the concept of Hong Kong as a Special Administrative Region and, in April 1984, both sides agreed that Hong Kong would retain a high degree of autonomy with assurances made on the preservation and maintenance of the lifestyle of the people in Hong Kong. In September 1984, both sides agreed on the Chinese and English versions of the text and the "one country, two systems" model was adopted.

<http://theconversation.com/hong-kong-why-the-one-country-two-systems-model-is-on-its-last-legs-118960>.

- ³⁶ AK, "What is China's "one country, two systems" policy?," *The Economist*, 30 June 2019, available at <https://www.economist.com/the-economist-explains/2019/06/30/what-is-chinas-one-country-two-systems-policy>.
- ³⁷ "Hong Kong crisis — What you need to know," *DW*, 22 August 2019, available at <https://www.dw.com/en/hong-kong-crisis-what-you-need-to-know/a-50131325>.
- ³⁸ Ibid.
- ³⁹ Brian Wong, "Can Beijing and Hong Kong Rejuvenate 'One Country, Two Systems'?", *The Diplomat*, 18 October 2019, available at <https://thediplomat.com/2019/10/can-beijing-and-hong-kong-rejuvenate-one-country-two-systems/>.
- ⁴⁰ Gray Cheung, "What is the Sino-British Joint Declaration and what does it have to do with Hong Kong's extradition crisis?," 4 July 2019, available at <https://www.scmp.com/news/hong-kong/politics/article/3017318/explainer-what-sino-british-joint-declaration-and-what-does>.
- ⁴¹ Brian Wong, "Can Beijing and Hong Kong Rejuvenate 'One Country, Two Systems'?", *The Diplomat*, 18 October 2019, available at <https://thediplomat.com/2019/10/can-beijing-and-hong-kong-rejuvenate-one-country-two-systems/>.
- ⁴² Ibid.
- ⁴³ Niki JP Alsford, "Hong Kong: why the 'one country, two systems' model is on its last legs," 19 June 2019, available at <http://theconversation.com/hong-kong-why-the-one-country-two-systems-model-is-on-its-last-legs-118960>.
- ⁴⁴ Hong Kong Basic Law en-version, available at <https://www.basiclaw.gov.hk/en/basiclawtext/index.html>.
- ⁴⁵ Niki JP Alsford, "Hong Kong: why the 'one country, two systems' model is on its last legs," 19 June 2019, available at

<http://theconversation.com/hong-kong-why-the-one-country-two-systems-model-is-on-its-last-legs-118960>.

⁴⁶ Ibid.

⁴⁷ BBC, "Hong Kong-China extradition plans explained," *BBC*, 13 December 2019, available at <https://www.bbc.com/news/world-asia-china-47810723>.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Ibid.

⁵¹ Ibid.

⁵² Ibid.

⁵³ "Hong Kong dissident reopens bookshop in Taiwan, defying Beijing," *Al Jazeera*, 25 April 2020, available at <https://www.aljazeera.com/news/2020/4/25/hong-kong-dissident-reopens-bookshop-in-taiwan-defying-beijing>.

⁵⁴ "Hong Kong-China extradition plans explained," *BBC*, 13 December 2019, available at <https://www.bbc.com/news/world-asia-china-47810723>.

⁵⁵ Andrew J Nathan, "How China Sees the Hong Kong Crisis: The Real Reasons Behind Beijing's Restraint," *Foreign Affairs*, 30 September 2019, available at <https://www.foreignaffairs.com/articles/china/2019-09-30/how-china-sees-hong-kong-crisis>.

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ Ibid.

⁵⁹ Hong Kong Basic Law en-version, available at <https://www.basiclaw.gov.hk/en/basiclawtext/index.html>.

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² Ibid.

⁶³ Hong Kong Basic Law en-version, available at <https://www.basiclaw.gov.hk/en/basiclawtext/index.html>.

- ⁶⁴ Ibid.
- ⁶⁵ Ibid.
- ⁶⁶ Hong Kong Basic Law en-version, available at <https://www.basiclaw.gov.hk/en/basiclawtext/index.html>.
- ⁶⁷ Ibid.
- ⁶⁸ Brian Wong and John Mak, "'One Country, Two Systems' Is still the best model for Hong Kong, But it badly needs reforms," 30 October 2019, <https://time.com/5713715/hong-kong-one-country-twosystems-failure/>.
- ⁶⁹ "Hong Kong security law: What is it and is it worrying?," *BBC*, 30 June 2020, available at <https://www.bbc.com/news/world-asia-china-52765838>.
- ⁷⁰ Ibid.
- ⁷¹ Milia Hau, "Britain Failed Hong Kong," *Foreign Policy*, 12 June 2019, available at <https://foreignpolicy.com/2019/06/12/britain-failed-hong-kong/>.
- ⁷² Derek Grossman, "One Country, Two Systems, Lots of Problems," *Foreign Policy*, 21 June 2019, available at <https://foreignpolicy.com/2019/06/21/one-country-two-systems-lots-of-problems/>.
- ⁷³ Claudia Rosett, "A defiant stand for freedom: Hong Kong's struggle against tyranny and why it matters, The Social Order, Politics and law," 11 December 2019, available at <https://www.city-journal.org/hong-kong-struggle-against-tyranny>.
- ⁷⁴ "HK vs China GDP: A sobering reality," 9 June 2017, available at <http://www.ejinsight.com/20170609-hk-versus-china-gdp-a-sobering-reality/>.
- ⁷⁵ Claudia Rosett, "A defiant stand for freedom: Hong Kong's struggle against tyranny and why it matters, The Social Order, Politics and law," 11 December 2019, available at <https://www.city-journal.org/hong-kong-struggle-against-tyranny>.

- ⁷⁶ "HK vs China GDP: A sobering reality," 9 June 2017, available at <http://www.ejinsight.com/20170609-hk-versus-china-gdp-a-sobering-reality/>.
- ⁷⁷ Ibid.
- ⁷⁸ Ibid.
- ⁷⁹ Derek Grossman, "One Country, Two Systems, Lots of Problems," *Foreign Policy*, 21 June 2019, available at <https://foreignpolicy.com/2019/06/21/one-country-two-systems-lots-of-problems/>.
- ⁸⁰ Ibid.
- ⁸¹ Daniel TL Shek, "Protests in Hong Kong (2019–2020): a Perspective Based on Quality of Life and Well-Being," 13 March 2020, Department of Applied Social Sciences, The Hong Kong Polytechnic University, Kowloon, Hong Kong.
- ⁸² Ibid.
- ⁸³ Brian Wong and JhonMak, "'One Country, Two Systems' Is Still the Best Model for Hong Kong, But It Badly Needs Reform," 30 October 2019, available at <https://time.com/5713715/hong-kong-one-country-two-systems-failure/>.
- ⁸⁴ Syaru Shirley Lin, "Analyzing the Relationship between Identity and Democratization in Taiwan and Hong Kong in the Shadow of China," Chinese University of Hong Kong, The Asan Forum, 20 December 2018, available at <http://www.theasanforum.org/analyzing-the-relationship-between-identity-and-democratization-in-taiwan-and-hong-kong-in-the-shadow-of-china/>.
- ⁸⁵ Syaru Shirley Lin, "Analyzing the Relationship between Identity and Democratization in Taiwan and Hong Kong in the Shadow of China," Chinese University of Hong Kong, The Asan Forum, 20 December 2018, available at <http://www.theasanforum.org/analyzing-the-relationship-between-identity-and-democratization-in-taiwan-and-hong-kong-in-the-shadow-of-china/>.

⁸⁶ Ibid.

⁸⁷ Ibid.

⁸⁸ Derek Grossman, "One Country, Two Systems, Lots of Problems," *Foreign Policy*, 21 June 2019, available at <https://foreignpolicy.com/2019/06/21/one-country-two-systems-lots-of-problems/>.

⁸⁹ Brian Wong and Jhon Mak, "'One Country, Two Systems' Is Still the Best Model for Hong Kong, But It Badly Needs Reform," 30 October 2019, available at <https://time.com/5713715/hong-kong-one-country-two-systems-failure/>.

⁹⁰ Ibid.

⁹¹ Ibid.

⁹² Brian Wong, "Hong Kong's Looming 2047 Question," *The Diplomat*, 1 January 2020, available at <https://thediplomat.com/2020/01/hong-kongs-looming-2047-question/>.

⁹³ Ibid.