

# One Country, Two Systems: An Example of Divisible Sovereignty?

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## **Abstract**

This article analyses the experience of “One Country, Two Systems” to flesh out a continuous and divisible understanding of sovereignty. A binary and exclusive concept of sovereignty is too contingent on statehood to describe an international system marked by divided authority. Hong Kong, as a sub-state that legally lacks sovereignty yet has high levels of autonomy and authority over its population, is a unique opportunity to help create a new, more flexible organizing principle for the international system.

The article focuses on “tests”: instances where Hong Kong’s political process and local authority came into conflict with external factors, be they Chinese objectives or engagement with the international system. The tests fall into three categories, which could be seen as the most salient elements of authority: the ability to enforce legislation inside a defined jurisdiction (i.e. territoriality); the ability to define problems, priorities and solutions (i.e. policy autonomy); and the ability to engage with the international system (i.e. foreign engagement and diplomatic recognition). These tests help determine what elements of Hong Kong’s autonomy (and, by extension, any instance of high, but not complete, autonomy in a sub-state) are the most politically salient.

## **Introduction**

During the 2016 Summer Olympics in Rio de Janeiro, thirty-seven athletes marched under the flag of the Hong Kong Special Administrative Region; almost every other delegation marched under the flag of a sovereign state. Hong Kong’s presence at the Olympics is only part of its presence on the international stage. The city sits as an equal and independent member of several international organizations, such as the World Trade Organization and the World Health Organization. Hong Kong has economic and trade development offices in the world’s major cities. This special status is reciprocated: over 120 countries have consulates in Hong Kong, and both the American and British Consuls report directly to their foreign ministries (as opposed to the Embassy in Beijing).

This makes Hong Kong a strange occurrence: a sub-state unit whose domestic autonomy approaches the level of sovereign states. This autonomy is recognized by the international community which engages with the city through several *de jure* and *de facto* channels.

Sovereignty is traditionally understood to be binary: political entities are either sovereign or not sovereign. When non-state sovereignty is discussed, it is usually in the context of state failure (as is the case of Somaliland) or foreign protection (as is the case with Taiwan or South Ossetia). In both kinds of *de facto* sovereignty, the nominal sovereign cannot fully express its authority, either from lack of capability or the threat of foreign conflict.

Places like Hong Kong challenge this traditional definition. China is clearly not a failed state, nor is Hong Kong protected by any foreign power. Compare Hong Kong with Taiwan: the United States has promised to defend Taiwan if China attempts to forcibly change the status quo. Hong Kong has no similar guarantees if China decided to unilaterally revoke "One Country, Two Systems." Yet Hong Kong's autonomy has persisted twenty years since the Handover, despite many predictions to the contrary during the Handover.

The puzzle of Hong Kong's autonomy presents an opportunity to discuss authority and the international system.

Theorists often consider sovereignty to be "conceptually daunting terrain," (Krasner, "Organized Hypocrisy" 237–38). While there have been many critiques of traditional sovereignty, there has yet to be a replacement principle to organize the international system. Occurrences of divided authority are becoming more common, whether granted upwards to international institutions like the European Union, or devolved downwards to sub-state units like Scotland and Northern Ireland in the United Kingdom, Catalonia and the Basque Region in Spain, and Kurdistan in Iraq.

We need a way to examine how sovereignty and authority varies between units in the international system. Autonomous sub-state units like Hong Kong are a good first step as, like states, they express authority within a defined territory over a defined population. Yet the city is clearly not a sovereign state, as it lies within China's "sovereign" jurisdiction. Analyzing Hong Kong's experience since the Handover can help us isolate the important elements of authority, how these elements interact between different political units, and how they are contested within the polity.

As a sub-state unit with significant autonomy, Hong Kong is a way to examine which elements of authority really matter. Debates over Hong Kong and "One Country, Two Systems," while politically vibrant, have not, until very recently (i.e. the rise of the localist movement), been wedded to the symbolic arguments for sovereignty and independence. Yet debates over control, authority and identity are just as present in Hong Kong as they are in sovereign (and aspiring to be sovereign) entities.

After starting with a brief explanation as to why Hong Kong does not cleanly align with traditional understandings of sovereignty, the article examines the history of Hong Kong since the Handover, focusing

on several instances where the division of authority between Hong Kong and China was contested. We can group these tests into three indicators of authority.

1. The ability to enforce rules and regulations within a defined territory. (i.e. territoriality, control of borders)
2. The ability to define problems, priorities and solutions (i.e. policy autonomy)
3. The ability to engage with other political units in the international system (i.e. foreign engagement and diplomatic recognition)

Most sticking points that have emerged in Hong Kong since the Handover fit into one of these three categories. For example, the immigration debate and the worry about abductions by Chinese law enforcement concern control of borders. The debates over Article 23, national education and political reform concern Hong Kong's ability to define problems, priorities and solutions. Finally, Hong Kong's position as a non-state with significant autonomy and limited foreign relations have led to confusion in events like the Manila Hostage Crisis or Edward Snowden's escape to Hong Kong.

Some of these events deal with the limitations of Hong Kong's autonomy within a larger Chinese sovereign state and in an international community designed around states. However, the fact that we can even have these discussions over Hong Kong shows how different it is from other sub-state entities in the level of its autonomy.

A distinction should be made between formal intervention, informal influence and extra-constitutional or unilateral interference. Formal intervention is when China, through a constitutional mechanism, intervenes in Hong Kong affairs, such as when Beijing represents Hong Kong in diplomatic discussions. Informal influence is when Chinese officials encourage Hong Kong officials to enact policies that benefit Chinese interests. Finally, unilateral interference would occur when China directly intervenes in Hong Kong affairs through extra-constitutional methods. Whereas opinions can differ on whether they benefit Hong Kong's interests, formal intervention and informal influence do not fundamentally challenge the constitutional structure of "One Country, Two Systems." Unilateral interference, due to its use of extra-constitutional methods, would.

### **State Sovereignty and "One Country, Two Systems"**

Despite being one of the most central concepts in international relations theory, many theorists have struggled to define what "sovereignty" is. The traditional definition focuses on two principles: the "exclusion" principle and the "non-intervention" principle.

“Exclusion” states that there is only one sovereign for any given person or territory (Brierly 162), which is what differentiates modern states from hierarchical feudal and medieval systems (Hinsley 22). “Non-intervention” states that a sovereign must be able to express its sovereignty without interference from others. Sovereignty is usually combined with territoriality, which is what leads to the “sovereign state”: where a “sovereign” (however it is constituted) has an exclusive and ultimate authority over a defined population in a defined area.

Despite the clarity of these principles, the “traditional definition” of sovereignty can struggle to explain how authority is divided in the international system. This is due, in part, to the very different ways the term is used. Stephen Krasner, in his book *Sovereignty: Organized Hypocrisy*, suggests four different definitional classes:

- ◆ Domestic sovereignty, which concerns the nature of political authority within a state.
- ◆ International legal sovereignty, which describes whether a polity is recognized as an individual legal actor.
- ◆ Westphalian sovereignty, which focuses on territoriality and non-intervention and lies at the heart of a traditional “community of states.”
- ◆ Interdependence sovereignty, which is loosely used by theorists who argue that state sovereignty is under threat from globalization and other international phenomenon. (Krasner, *Sovereignty* 20)

The issue is that sovereignty is simultaneously a positive description of internal characteristics and a norm of international law. The current postcolonial world order has embraced the idea of exclusive sovereignty with complete domestic authority and non-intervention, as a reaction against the domination of empires. Thus, the legal norm of sovereignty is “what keeps the United States from conquering the Bahamas, or Nigeria from seizing Togo, or Australia from occupying Vanuatu” (Wendt 20). However, “sovereignty” is also meant to be descriptive of “statehood.” If an entity does not have exclusive authority, then it is neither sovereign, nor a state.

The fact that sovereignty is both a positive and normative concept means there are entities that have one, but not the other. *De facto* states are political entities that have exclusive authority yet, for various reasons, do not have legal sovereignty. Other states are legally recognized as sovereign but in practice do not have full and exclusive authority.

The issue perhaps stems from the binary nature of “sovereignty” as normally understood: a political entity is either sovereign or not sovereign, with nothing in between. A more continuous understanding of sovereignty and authority would allow us to have a more complex

and accurate understanding of how authority varies in the international system, both between and within states.

Sovereignty has not always been a binary concept. International law in the nineteenth century used “civilization” to judge the internal conditions of different polities and to see whether they were worthy of joining the international community as equal, sovereign members. However, this concept was usually used to justify colonial subjugation. (Anghie 58). The decolonization movement meant that connecting sovereignty to the internal conditions to a state fell out of favor (Jackson 16). However, this removed the connection between domestic capacity and legal recognition entirely. Some sovereign states have a limited ability to exert authority over their territory, yet are recognized to be sovereign. Other polities, despite having all the powers of the sovereign state, are for various reasons not considered to be sovereign (Bartmann 17).

Some theorists, like Krasner and Aihwa Ong, rather than viewing sovereignty as a central principle of the international system, instead view it as a norm followed or disregarded by states to suit their objectives. Krasner specifically cites Hong Kong as an example:

China could have established Hong Kong as a distinct part of China governed by different rules but without any special international or transnational ties. Such an arrangement would have been perfectly consistent with international legal and Vattelian sovereignty, but might not have assuaged the anxiety of commercial interests. [...] Instead, China opted for an arrangement that gave Hong Kong a distinct domestic position and, with the agreement of other states, a distinct international status as well. [...] (Krasner, “Organized Hypocrisy in East Asia” 174).

Aihwa Ong extends this idea to the concept of the “zone of exception”: areas with some local authority to pass pro-market policies, limit regulation and encourage greater domestic and foreign investment, in order to create “new economic possibilities” (Ong 7). Ong specifically cites the “Special Economic Zones” pioneered in China and emulated around the developing world.

Several theorists have argued for a continuous definition of sovereignty, or at least one with multiple levels. As J. Samuel Barkin and Bruce Cronin write, “sovereignty should be viewed as a variable rather than as a constant and therefore [...] the state as a basic analytic unit should be scrutinized” (Barkin and Cronin 108). David Lake has called for “a continuum along which deviations can be understood to vary,” (Lake 320) while anthropologist Cathryn Clayton, in writing about Macau, has argued that the city’s official status of “Chinese under Portuguese administration” in colonial times was an attempt to define

its status in an international system that was not built to accept divided authority. (Clayton 51).

If we are to understand “sovereignty,” or at least authority, as a continuous and divisible concept, we need to determine how “much” sovereignty a place has. Hong Kong is not legally sovereign, nor is it considered *de facto* sovereign (as Taiwan or Somaliland are). However, Hong Kong has significant authority over its population, far more than Beijing does. “One Country, Two Systems” is unique in its division of authority between state and sub-state, and so presents an opportunity to study which elements matter.

Chapter I of Hong Kong’s constitution, the Basic Law, outlines the twin principles of “One Country, Two Systems”: “The Hong Kong Special Administrative Region is an inalienable part of the People’s Republic of China” and “The National People’s Congress authorizes the Hong Kong Special Administrative Region to exercise a high degree of autonomy and enjoy executive, legislative and independent judicial power, including that of final adjudication, in accordance with the provisions of this Law.”

Hong Kong has independent authority in almost all areas of government. Article 18 excludes the city from national legislation. Article 106 gives the Hong Kong government taxing and spending power, and states that no tax revenue goes to the central government in Beijing. Article 111 allows the city to have its own currency. Hong Kong has different official languages: English and “Chinese” (in practice, Cantonese). Hong Kong even has its own version of citizenship with its “permanent resident” status.

The Mainland has authority over Hong Kong in three areas. The first area is foreign policy. But even here, the boundaries are fuzzy. Articles 150–152 allow Hong Kong to join Chinese diplomatic delegations, sign international treaties and join international organizations under its own authority. Hong Kong can also sign bilateral immigration, legal and trade agreements. Finally, Hong Kong is empowered to have representative offices in foreign countries, though they deal with trade and economic concerns rather than diplomatic or security ones.

Second, Annex 3 of the Basic Law allows the National People’s Congress to mandate that Hong Kong’s government pass certain legislation. Such legislation, however, is written and passed by local legislative processes, and the end-result does differ from Mainland legislation. As of writing, Annex 3 includes legislation on the treatment of the national symbols and diplomatic immunities.

Finally, the Standing Committee of the National People’s Congress is the final interpretive body of the Basic Law. The National People’s Congress also has final say on amendments to the Basic Law, though amendments must pass a local process first.

Outside of these constitutional mechanisms, China does have significant informal influence over Hong Kong's affairs. Hong Kong's political system gives disproportionate influence to the establishment, which tends to have preferences that align closely with China's. However, the final decision is still left to local governing institutions and political processes. Several of the tests that have arisen since the Handover concern China's efforts in trying to exert informal influence through local political processes.

A good comparison to see the extent of Hong Kong's authority is to compare it to sovereign member states in the European Union. EU member states have delegated monetary authority, immigration control, and economic regulation to EU institutions. However, EU member states do have the right to leave the EU; in contrast, Hong Kong does not have the authority to unilaterally claim more authority for itself.

However, in practice, even when entities have the *de jure* power to unilaterally change how authority is divided, the costs of exerting that power in practice are often high, as shown by the current discussion over the United Kingdom's decision to leave the European Union.

Thus, Hong Kong has significant, if not near-complete, authority to determine its own affairs. It also has a (limited) space on the international stage, despite not being sovereign. This does not fit cleanly with a binary definition of sovereignty, but could fit in a more continuous understanding.

### Testing Hong Kong's Jurisdiction

The border between Hong Kong and Mainland China is unique in the international system: a physical border between a sub-state unit and its larger state unit with immigration and customs controls. It also represents the end of China's jurisdiction and the beginning of Hong Kong's authority. Questions over where China's jurisdiction ends and Hong Kong's begins have remained politically salient (as they do for international borders).

One of the earliest tests of Hong Kong's authority involved immigration: who would be allowed to live and work in Hong Kong. In 1999, the Court of Final Appeal ruled that all children of permanent residents could themselves become permanent residents, regardless of the residency status of the parents when the child was born. The Hong Kong government was concerned that this would lead to a huge influx of newly-eligible residents, and so asked the Standing Committee of the National People's Congress to interpret the Basic Law. The reinterpretation was immediately criticized as a dangerous intervention into Hong Kong's judicial independence (No), even though the reinterpretation was largely in line with Hong Kong public opinion, which supported more stringent residency standards.

immigration has remained a political issue since the Handover, and one of the few points of tension between the Hong Kong government and the Mainland. The local government has taken aggressive action towards Mainland immigration, from controls on informal exports of food products (Nip) to a “zero-quota” on pregnant Mainland mothers to restrict “birth tourism” (“Government reaffirms its strict enforcement of the ‘zero quota’ policy”).

More recently, Hong Kong has faced the prospect of Mainland law being enforced in Hong Kong’s territory. The first was the abduction of five Hong Kong-based booksellers known for selling scandalous works involving Chinese officials. These booksellers were brought to China, where they were arrested and charged with breaking Mainland law. It is heavily suspected (though not proven) that Mainland law enforcement agencies were involved. The second example concerns the current agreement to allow PRC immigration and customs officials to operate within the soon-to-be-completed high-speed rail station (albeit only within the “Mainland port zone”) (Kao, Yeung and Ng).

The full implications of each of these examples have yet to be fully revealed. However, these two events were politically controversial because they opened the prospect of the PRC’s jurisdiction extending—formally in the case of the rail station, informally in the booksellers case—into Hong Kong territory.

### **Testing Hong Kong’s Policy Autonomy**

“Policy autonomy” could perhaps be best understood as the authority to define both problems and solutions. In Hong Kong’s case, local governing institutions have full authority to determine what problems to tackle and how to best solve them. However, there have been several instances since the Handover where it appeared that Hong Kong’s government was letting Mainland processes determine both problems and solutions, rather than deciding these issues themselves: a perception compounded by public support by Mainland officials. However, it should be noted that these objectives still had to be implemented through local political processes: public pressure on these processes successfully blocked the proposed policy change.

Each of the following “tests” is an instance where Hong Kong’s policy autonomy appeared to be threatened by Mainland influence.

The first major test was the attempt to pass national security legislation in 2004. Article 23 of the Hong Kong Basic Law requires the city to pass some form of “national security” legislation, though does not go into specifics. In 2004, the Tung Chee-hwa administration proposed legislation that would criminalize both seditious action and speech. It was immediately criticized as a violation of Hong Kong’s protections for freedom of association and freedom of speech. But criticism also focused around the question of control. Legal groups



noticed that the government's proposed legislation delegated the responsibility of defining "sedition" to institutions in Beijing, rather than keeping that authority within the Hong Kong government. Given the likely difference in opinion between Hong Kong and China on what constituted "sedition," the proposed package was a significant loss of authority (Article 23 Concern Group).

Mass public protests and an emboldened opposition blocked the passage of the government's proposed package, and no similar packages have been proposed since. The official position is that Hong Kong will need to pass such legislation eventually, once conditions are right.

The second major test concerned the implementation of "national education." In 2010, Chief Executive Donald Tsang proposed a new class in "Moral and National Education" so that "the younger generation may gain a deeper understanding of our country, develop a stronger sense of national identity, and recognize the common origin and close bonds between Mainland and Hong Kong people" ("2010-11 Policy Address by Chief Executive"). This led to concerns that "national education" would be used to "brainwash" Hong Kong's young population (Ngo). Activist groups, like the radical student group "Scholarism," demanded that the subject include politically-sensitive or controversial topics (such as the Tiananmen Square Massacre), or be stopped entirely (Yeung). After large public protests in 2011 and 2012, Chief Executive CY Leung tabled the implementation of national education rather than risk greater public opposition. The debate over "national education" is thus similar to the fight over national security legislation as an example of a China- (and pro-China-establishment-) supported policy that was blocked by public opposition. "National education" was an example where the Hong Kong public (and, by extension, the political process) felt that the issue in question—a lack of a sense of "Chineseness" amongst Hong Kong's youth—was not a problem at all, let alone a priority for the government.

The final test is the failure of the 2014 political reform package, spurred by the Occupy Central protests. This test is notable for highlighting the central role played by Hong Kong institutions, yet also shows the limits of Hong Kong's current political system in driving positive change.

In August 2014, the National People's Congress released their interpretation of how Hong Kong's election process would work. The Hong Kong government then devised a political reform package based around that interpretation. The Nomination Committee was based on the current Election Committee for the Chief Executive: the largely unelected 1200-member group dominated, in practice, by pro-China establishment interests (Cheung et al.). Mass student and activist protests in October 2014 emboldened the political opposition to the political reform package, which was ultimately blocked in the Legislative Council.

We can draw mixed lessons from this test. First, it highlights the central role played by Hong Kong institutions. The package was defeated by local political processes and popular protest, and neither the Hong Kong government nor Beijing forced its passage through extra-constitutional or extra-legal processes.

Second, the opposition did achieve its short-term objective: blocking the government's proposal for political reform. For a third time since the Handover, public protest and local political processes defeated a policy change supported by both the Mainland and the pro-China establishment.

Third, and less positively, Hong Kong's political process was unable to develop a more democratic political reform package, nor encourage either the pro-China establishment nor the central government to offer a more democratic interpretation. This perhaps shows the limits of "One Country, Two Systems": local political processes can stop policy change that affects Hong Kong, but has limited ability to change the situation on its own terms.

Each of these tests correspond to some element of policy autonomy. "National Education" concerned the ability to define problems: Hong Kong's public felt that the issue in question—a lack of "Chineseness" amongst the city's youth—was not a problem at all, despite the claims of the pro-China establishment. The failed political reform process, on the other hand, concerned the ability to define solutions: whereas Hong Kong's population did believe the lack of democracy was a pressing problem, the protest movement was upset that the solution was framed by decisions in Beijing. Finally, Article 23 impacted the ability to define problems and solutions: few people believed that sedition was an issue, and many were upset that implementation of the solution was delegated to Beijing.

### **Testing Hong Kong's Foreign Engagements**

The final set of "tests" concern Hong Kong's relationship with foreign entities. Hong Kong has limited foreign relations with other governments, but even this limited engagement is far beyond what other sub-states possess. Some provinces, federal states and cities engage in limited foreign representation, mostly to encourage inward trade and investment, to facilitate cross-border activities and (rarely) to make public nonbinding comments on foreign affairs. In contrast, Hong Kong has a wide-ranging scope to discuss interests and policies with both other countries and international organizations as an equal partner. This limited independence is reciprocated by other governments: Hong Kong has the second-largest density of consulates after New York City.

However, there have been two prominent occasions since the Handover where the city's fuzzy status has led to confusion.

The first test was the Manila Hostage Crisis of 2010. Filipino President Benigno Aquino rebuffed several attempts by then Chief Executive Donald Tsang to make direct contact, instead following diplomatic protocol by summoning the Chinese Ambassador (Robles and Fung). The Hong Kong government placed a travel warning on the Philippines in retaliation (Lam, “Black Alert”), and revoked the ability of Filipino officials to travel to Hong Kong without a visa (Lee).

President Aquino was largely dismissive of Hong Kong officials’ attempts to contact him. When the Hong Kong government attempted to send him a letter challenging Manila’s handling of the crisis, President Aquino called the letter “insulting”, and “conveyed through the People’s Republic of China government that maybe sending that letter to me was not right.” He continued that the situation was as “if a Philippine governor suddenly demands to speak with President Obama or Hu Jintao.” (Robles and Liu). Both Tsang and his successor, CY Leung, have met with Aquino on the sidelines of APEC summits in order to press demands. (Calica; Simpson Cheung).

The Manila crisis is a clear example where Hong Kong attempted to intrude on normal diplomatic channels. Hong Kong’s significant autonomy meant that the city government felt responsible for Hong Kong residents affected by the crisis, yet its lack of statehood meant that its overtures were rebuffed. However, Hong Kong’s autonomy also meant it could retaliate against the Philippines, leading to tension that needed to be resolved by a face-to-face meeting.

The second test was NSA whistleblower Edward Snowden. Every stage of his escape to Hong Kong was facilitated by the city’s independent relationship with the United States. Snowden could travel to Hong Kong on short notice because of the city’s visa-waiver agreement with the United States: American citizens can visit Hong Kong without a visa, which they cannot do for Mainland China. On Snowden’s arrival in the city, Washington called for the Hong Kong government to honor its extradition agreement with the United States—another agreement unique to the Hong Kong–US relationship, and not the China–US relationship.

Snowden’s escape to Hong Kong also raised the prospect of local Hong Kong institutions passing judgement on another country’s internal affairs: the extradition agreement had an opt-out clause if an extradition request was deemed to be politically motivated. Local courts were ultimately responsible for deciding whether Snowden would have been returned to the United States, or would have been granted asylum in Hong Kong. However, Snowden was allowed to leave Hong Kong before the extradition process could be started, so Hong Kong’s judicial process—and the ability of China to interfere—was not tested.

However, much like with the Manila Hostage Crisis, Hong Kong’s independent role in the dispute was neglected in favor of the relationship between Washington and Beijing. The Hong Kong

government had independent reason to talk to Snowden, due to his claims that the United States had surveilled Hong Kong institutions (Lam, “Edward Snowden”). Hong Kong claimed after Snowden’s escape that the United States’ extradition request did not comply with local law (as opposed to Chinese law). (“HKSAR Government issues statement on Edward Snowden”). Beijing officials, for their part, argued that Hong Kong had the authority to make this decision (Zhai).

In fact, Snowden’s escape from Hong Kong was itself facilitated by the United States’ neglect of Hong Kong’s authority. Washington was largely focused on talking to Beijing, and did not notify Hong Kong of its wish to extradite Snowden in a timely fashion. Finally, Washington failed to notify Hong Kong of its withdrawal of Snowden’s passport, allowing Snowden to escape (or, perhaps more accurately, allowing Hong Kong to allow Snowden to escape).

While these tests do show some of the limitations of Hong Kong’s “foreign policy,” it is important to remember that most sub-states have *no* room for foreign relations. None of these tests could have emerged without Hong Kong acting as, at least, a partly independent on the world stage. It is easy to simplify discussions of foreign relations by sub-state units by arguing that they are extensions of state foreign policy, and that they do not have independent interests from the state. However, Hong Kong’s independent authority complicates this: much like how the city acts independently on domestic affairs, it also acts independently in foreign affairs, at least in part.

## Conclusion

In a system largely seen as divided into sovereign and non-sovereign entities, Hong Kong could be considered mostly sovereign. The city largely has complete control over its own policies and governance. Its local institutions have few, if any, formal connections to Beijing. And while the city may not engage with the international system as sovereign states do, it can still be treated as a junior, but still partly independent, partner.

Despite expressly not being sovereign, looking at Hong Kong through the prism of sovereignty helps to clarify much of what has happened since the Handover. The case of Hong Kong, as a sub-state unit with significant levels of authority, highlights three empirical indicators that may emerge in any discussion of “sovereignty.” The first indicator concerns how an entity’s jurisdiction is delineated, which encapsulates concerns over borders, citizenship and enforcement. The second indicator concerns policy autonomy: which body has the authority to define a problem, set priorities and develop a solution? The third concerns recognition: how is a polity treated by other political entities?

The relationship between Hong Kong, Mainland China and the wider world will undoubtedly change further over the coming decades. Hong Kong's increasingly separate identity (fostered in part by its independent institutions, civil-political rights, and its high level of autonomy) has become a salient political issue. It has hardened opposition to both the central Chinese government and the pro-Chinese establishment, as well as a counter-reaction by pro-China groups in Hong Kong. In contrast, China has grown more assertive in pushing its point of view about Hong Kong's future—while it may still back down in the face of public protest and political opposition, it may be less willing to consider concessions. Finally, the rise of a pro-independence movement has finally connected the city's arguments for autonomy with the symbolic demand for statehood: something the city had avoided up to now.

Then there is the upcoming expiry date for “One Country, Two Systems”: 2047. Hong Kong is supposed to be governed under a different structure from that point onward. We need a way to understand and analyze the various options, whether it is the continuation of “One Country, Two Systems,” a system of reduced autonomy, or some other constitutional system of divided authority.

“Sovereignty”—or, more specifically, a continuous version of it—would be an interesting and illuminating way to see what the repercussions might be for Hong Kong politics.

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