"MAINLANDIZATION" OF HONG KONG. A MODEL OF INFLUENCE, RESISTANCE AND ADJUSTEMENT

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Abstract

The aim of this article, based on the author's field research in Hong Kong and critical analysis of publications, is to conceptualize the process of "mainlandization" of the Hong Kong SAR. "Mainlandization" is understood here as the process of transfer and institutionalization of political visions, policy paradigms, procedures, and norms which originate from the PRC. The model is inspired by various theoretical perspectives (e.g. diffusion of regimes, dependence, political convergence, and processes of "Europeanization"). The article differentiates the "top-down" transfer of values and/or policy standards and the "bottom-up" adjustment. All institutions engaged in intermediation (such as the "one country, two systems" principle) are mentioned, as well as the processes connected to the reaction to PRC activity in Hong Kong and their variations (e.g. accommodation, resistance, resignation). Moreover, the concept of "sinoscepticism" is introduced.

Keywords: "Mainlandization", Hong Kong-China relations, institutionalization, sinification, political influence, asymmetric relations, Special Administrative Region, sovereignty, autonomy

Título en Castellano La "continentalización" de Hong Kong un modelo de influencia, resistencia y ajuste

Resumen

El objetivo de este artículo, basado en la investigación de campo del autor en Hong Kong y el análisis crítico de publicaciones, es conceptualizar el proceso de "continentalización" de Hong Kong como Región Especial Administrativa. La "continentalización" la entendemos como el proceso de transferencia e institucionalización de visiones políticas, paradigmas políticos, procedimientos y normas que se originan en la República Popular China. El modelo se inspira en diversas perspectivas teóricas (por ejemplo, difusión de regímenes, dependencia, convergencia política y procesos de "europeización"). El documento diferencia la transferencia "de arriba hacia abajo" de valores y/o estándares de política y el ajuste "de abajo hacia arriba". Se mencionan todas las instituciones dedicadas a la intermediación (como el principio de "un país, dos sistemas"), así como los procesos relacionados con la reacción a la actividad de la República Popular China en Hong Kong y sus variaciones (por ejemplo, acomodación, resistencia, resignación). Además, se introduce el concepto de "chinoescepticismo".

Palabras Clave: Continentalización, relaciones China-Hong Kong, institucionalización, Chinificación, influencia política, relaciones asimétricas, Región Especial Administrativa, soberanía, autonomía,

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1. Introduction

On 1 July 1997, Hong Kong returned to Chinese sovereignty after more than 150 years of administration by the British (for some parts of the region it was 137 and 99 years). The territory became a part of the People's Republic of China (PRC) but as a Special Administrative Region. One of the crucial subjects of the Sino-British negotiations in the 1980s had been the adoption of specific time-bound formal arrangements for the regulation of relations between Hong Kong and the PRC. The outcome was that Hong Kong retained a significant degree of autonomy (including, the right to continue to have its own currency) as well as the ability to retain its existing economic and legal system. Nevertheless, it became an "inseparable part of the PRC" in which China was to exercise "sovereign power"[2]. These formal arrangements were to remain in force for 50 years, starting from 1997.

Obviously, for Hong Kong it became necessary to adapt its political system to the new reality as it was no longer possible for it to maintain the political structure designed and administered by the British. Clearly there was also the need for some adjustment between the two polities – mainland China and Hong Kong. The character of the PRC-HKSAR relationship is sui generis so the formal arrangements between the two entities need to be carefully examined and understood. In this case, we are not dealing with a federal state, a protectorate, a colony, nor with a system of self-government or a confederation. The "one country, two systems" principle has led to a unique form of autonomy. That is why conceptualizing PRC-Hong Kong relations after 1 July 1997 involves some of the most interesting research questions being studied today.

In this article the author examines the process of "mainlandization" of the Hong Kong Special Administrative Region, which has been developing consistently, despite the fact that the principle of "one country, two systems" in theory limits the possibility of the Mainland's impact on HKSAR. After 22 years of Chinese sovereignty over the Hong Kong region, more and more signs of PRC's influence can be observed.

Although the term "mainlandization" is very often used by journalists and scholars, it has still not been precisely and deeply conceptualized within the terms of political science analysis. There are definitions presented by academics such as Sonny Shiu-Hing Lo and Wilson Wong, etc. but there is still place for theoretical conceptualizations. And as classicists political scientists emphasize, conceptual analysis is the first and fundamental step in every comparative research[3]. The present author aims to propose a model of "mainlandization", based on the experience of more than 20 years of the existence of the Hong Kong Special Administrative Region (HKSAR).

The author proposes a combined model, based on the author's field research in Hong Kong between 2012-2017 and critical analysis of publications, of the "mainlandization" process, the course of China's influence, as well as of the "backlash" from a part of Hong Kong society. The author's field research was organized in the form of semi-structured interviews with:

1. local politicians (activists of the Civic Party, People Power, Youngspiration, Hong Kong National Party)

2. academics (political scientists from Hong Kong Baptist University, Education University of Hong Kong, Hong Kong University) and

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[2] Ghai, Yash P. (1997): *Hong Kong's New Constitutional Order: The Resumption of Chinese Sovereignty and the Basic Law*, Hong Kong, Hong Kong University Press.

[3] Sartori, Giovanni: "Concept Misformation in Comparative Politics", *American Political Science Review,* Vol. 64, nº 4 (December 1970), pp. 1033-1053.

3. journalists (South China Morning Post).

The author also conducted:

4. focus group interviews with students (three focus interviews with Hong Kong Baptist University students organized in 2014, 2015 and 2016, one group of Hong Kong University students in 2016),

5. and also carried out a review of the relevant literature and press reports.

In the course of his research, the author also examined China's goals in in relation to the mainlandization process, and the instruments use by it; he also identified the determinants of its influence.

To propose a theoretical scheme for understanding the dynamics of the "mainlandization" process, the author has relied on certain theoretical concepts including the theory of diffusion of political regimes, dependence in international relations, and the case of "Europeanization". The challenge was how the process was to be modelled. The questions to be answered were 'What are the general features of mainland China's influence on Hong Kong?' 'What channels are used, which areas of the political system are involved in the process? 'What can the effects of that process be? Finally, 'What attitudes does "mainlandization" raise among members of Hong Kong society.'

2. Theoretical inspirations

At this point, the author's aim is not to present in detail all possible theoretical possibilities that could underpin the conceptualization of "mainlandization", rather the intention is to highlight the ones that were found to be most pertinent. The spectrum of theoretical perspectives from which HKSAR-PRC relationship could be analyzed is vast. The most illuminating at this stage seem to be as follows: the dependence theory[4], the theories of imperialism[5], influence in international relations (i.e. particular proposal of the modes of China's influence proposed by Evelyn Goh[6]), the theory of diffusion of political systems[7] and policies or even Huntington's clash of cultures. Another interesting point of view could be the concept of clientelism[8], the

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[4] Dos Santos, Theotonio: "The Structure of Dependence", *The American Economic Review,* Vol. 60, nº 2 (May 1970), pp. 231-236; Ferraro, Vincent: "Dependency Theory: An Introduction", in: Secondi, Giorgio (ed.) (2008): *The Development Economics Reader*, London, Routledge, pp. 58-64; Smith, Tony: "The Logic of Dependency Theory Revisited", *International Organization*, Vol. 35, nº 4 (Autumn 1981), pp. 755-761; Viotti, Paul R.; Kauppi, Mark V. (2012): *International Relations and World Politics*, 5th ed., Boston, Pearson.

[5] Cardoso Fernando H.; Faletto, Enzo (1972): *Dependencia y Desarrollo en America Latina*, Mexico, Siglo veintiuno editores C.A.; Galtung, Johan: "A Structural Theory of Imperialism", *Journal of Peace Research,* Vol. 8, nº 2 (June 1971), pp. 81-117; Barroll, Martin A.: "Toward a General Theory of Imperialism", *Journal of Anthropological Research,* Vol. 36, nº 2 (Summer 1980), pp. 174-195.

[6] Goh, Evelyn: "The Modes of China's influence Cases from Southeast Asia", *Asian Survey,* Vol. 54, nº 5 (September/October 2014), pp. 828-848.

[7] Gleditsch, Kristian Skrede; Ward Michael D.: "Diffusion and the International Context of Democratization", *International Organization,* Vol. 60, nº 4 (October 2006), pp. 911-933; Brinks, Daniel; Coppedge, Michael: "Diffusion Is No Illusion: Neighbour Emulation in the Third Wave of Democracy", *Comparative Political Studies,* Vol. 39, No. 4 (May 2006), pp. 463-489; Lidén, Gustav: "Democracy and Diffusion Creating a Comprehensive Model for Explaining Democracy", *Social Science Reports from Mid Sweden University*, nº 4 (2011), at http://miun.diva-portal.org/smash/get/diva2:468039/FULLTEXT01.pdf.

[8] Shiu-Hing Lo, Sonny (2008): *The Dynamics of Beijing-Hong Kong Relations: A Model for Taiwan*? Hong Kong, Hong Kong University Press.

theory of federalism or region-center relations[9]. Recently Benny Tai proposed the "sharp power" concept as a mode for analyzing China's influence on Hong Kong[10].

Modern theories of dependence/interdependence and imperialism in international relations among other instruments of influence highlight the role of education and the media in establishment of the dominance of one state over another. According to these theories dependence in the social, cultural, or ideological sphere may lead to changes in the sense of identity of a subordinated society, hybridization of language, and changes in the local culture. Although classical theories of imperialism do not apply to the mainland China-Hong Kong relations, analyzing the role of instruments of domination, such us migrations, language, media, and education may have a significant application to the research about the nature of the PRC-HKSAR relationship. Migrations, according Ho-Fung Hung[11], are used as an instrument of colonization of Hong Kong. The Mandarin language is forced on Hong Kong by the PRC, although Cantonese is the dialect of that region of China[12]. It is not without reason that the media and the education system in Hong Kong are two areas that the PRC is extremely keen to shape according to its own aims (issues of self-censorship in Hong Kong and moral and national education).

The theory of interdependence can help to analyze the asymmetric relationship between the PRC and Hong Kong, as well as the institutionalization of that mechanism. The theory also brings into focus the tensions between a dependent country and the dominant state that stem from the serious differences in the types of regime that rule in each entity. Some scholars believe that in such a situation convergence of the regimes is to be expected[13].

The concept of "Europeanization" is another interesting concept that may be useful for analyzing Chinese influence on Hong Kong, as well as the magnitude of the changes occurring there. Even though the term was coined in the context of the influence of EU norms and policies on nation-states during the integration process – it could still be helpful in studying the two-directional movement of influence in the PRC-HKSAR relationship, which may be described as "uploading" and "downloading". When analysing Europeanization scholars have identified two approaches, "top-down" and "bottom up". Robert Ladrech[14] focussing on the first has described it as 'an incremental process of re-orienting the direction and shape of politics to the extent that EC political and economic dynamics become part of the organisational logic of national politics and policy making.' According to the concept, the influence of EU policies on national polities can result in a number of different outcomes: *retrenchment* ("negative" effect, where the reaction of the state concerned is opposition to the influence), *inertia* (lack of change; where there is *absorption* i.e. adoption of "certain non-fundamental changes" but the 'core' is maintained); *transformation* (change of the fundamental logic of the earlier political

[9] Wheare, Kenneth Clinton (1963): *Federal Government*, London, Oxford University Press; Riker, William (1964): *Federalism: Origin, Operation, and Significance*, Boston, Little Brown; Gamper, Anna: "Global Theory of Federalism: The Nature and Challenges of a Federal State", *German Law Journal,* Vol. 6, nº 10 (October 2005), pp. 1297-1318; Burgess, Michael (2006): *Comparative Federalism: Theory and Practice*, London, Routledge; Bednar, Jenna: "The Political Science of Federalism", *Annual Review of Law and Social Science,* Vol. 7 (December 2011), pp. 269-288.

[10] Yiu-ting Tai, Benny (ed. 2018): *China's Sharp Power in Hong Kong*, Hong Kong Civil Hub.

[11] Ho-Fung, Hung: Three Views of Local Consciousness in Hong Kong. *The Asia-Pacific Journal-Japan Focus*, Vol. 12, Is. 44, nº 1 (November 2014), pp. 1-10.

[12] Liu, Juliana: "Cantonese v Mandarin: When Hong Kong Languages Get Political", *BBC News,* 29 June 2017, at https://www.bbc.com/news/world-asia-china-40406429.

[13] Szeptycki, Andrzej (2013): *Ukraina wobec Rosji. Studium zależności,* Warszawa, Wydawnictwa Uniwersytetu Warszawskiego.

[14] Ladrech, Robert: "Europeanization of domestic policies and institutions: The case of France", *Journal of Common Market Studies,* Vol. 32, nº 1 (March 1994), pp. 69-88.

behaviour[15]). These varying degrees of domestic change can be applied to the adjustment of Hong Kong politics to the process of "mainlandization". The concept of Europeanization also shows the logic of diffusion and institutionalization of formal as well as informal rules, procedures, and policies of the EU in a nation state.

Forms of influence in international relations can also be applied to Hong Kong studies. Especially fruitful can be Evelyn Goh's observations since her cases are based on Chinese activities in relation to neighbouring countries[16]. Goh distinguishes: *preference multiplier* (preferences of both sides are aligned; inducement as a tool), *persuasion* (enriched with economic incentives – preferences of partners are undecided/debated), and finally *ability to prevail* (preferences of the two sides are opposed; coercion as one of the instruments). It appears that all three forms can be applied to the strategy of mainlandization of Hong Kong – Beijing is using economic instruments as inducement, but also veiled threats (e.g. toward localist groups).

Another possible idea for analyzing the influence of mainland China on HKSAR is the convergence theory. Colin Bennett[17] indicates four processes that lead to convergence of policies:

1. *emulation*, which is imitation or conscious copying of similar policies of different states. This does not mean a diffusion, but an active borrowing of solutions and learning from experience. It is a kind of natural tendency to check how others solve similar problems and adapt their solutions;

2. *elite networking and policy communities* – such interactions take place at supranational forums as contacts and ideas are shared. Convergence is the result of interaction and consensus among members of the elite in the two entities concerned;

3. *harmonization* – intentional convergence as a result of consensus between transnational actors led by an international organization;

4. *penetration*, when a state is forced to conform to actions taken elsewhere by external actors, e.g. by threat of exclusion.

The theory of policy convergence also teaches us that convergence can be partial (for example convergence of goals, policy, instruments, or styles only) or complete. Convergence by *penetration* can be an example of integration of mainland China and HKSAR. Relevant examples can be the use of the anthem law or the interpretation over oath-taking of the Basic Law.

A different, but related concept, that of regime diffusion, stresses the role of geography, trade relations, or historical and cultural proximity of two states to explain the permeation of political styles and norms between them. Even though HKSAR is a part of China, not an independent state, the theoretical findings of the diffusion perspective could be useful for researchers because of the "one country, two systems" principle. Geographic and economic closeness is obvious between the two, further historically and culturally Hong Kong was part of the Chinese hemisphere despite the uniqueness of Cantonese culture and language that nativists groups in Hong Kong lay stress on. Proximity is a significant factor in the context of possible convergence.

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[15] Radaelli, Claudio M.: "The Europeanization of Public Policy", in Radaelli, Claudio M.; Featherstone, Kevin (eds.) (2003), *The Politics of Europeanization*, Oxford, Oxford University Press, pp. 27-56.
[16] Goh, *op. cit.*, pp. 828-848.
[17] Bennet, Colin J.: "What Is Policy Convergence and What Causes It?", *British Journal of Political Science,* Vol. 21, nº 2 (April 1991), pp. 215-233.

Authors like Sonny Shiu-Hing Lo even promote the of "clash of civilization" idea to analyze PRC-HKSAR relations[18] because of the tension created by the existence of two conflicting political cultures, as well as the enduring influence of Western-style democratization on Hong Kong. As mentioned earlier also, the more radical groups highlight the cultural dissimilarity of Hong Kong and the PRC.

Clientelism is an important concept, regularly used by Hong Kong's scholars to study mainland China – HKSAR relations. It is very useful for describing relations between the leaders of the CCP and the pro-Beijing groups in Hong Kong. As a reward for supporting the CCP vision of Hong Kong, mainland China can reward such persons with positions and access to resources. The United Front consists of political parties (e.g. DAB), trade unions (HKFTU) and dozens of grassroots organizations. As Christine Loh comments ironically, Hong Kong is the only place in the world where the ruling party is underground[19].

In the author's view, the most relevant theories for developing the "mainlandization" model are "Europeanization", dependence, convergence and influence in international relations. Though the "Europeanization" process is concerned with relations developed by two entities essentially interested in cooperation (the same cannot be said about all political groups in Hong Kong), it teaches us the modes of impact, tiers of influence and possible social effects (Euroscepticism vs Sinoscepticism). Other theories highlight the instruments of impact.

3. The concept of "mainlandization"

The topic of relations between the PRC and Hong Kong under the "one country, two systems" principle is discussed among mainland scholars on the basis of ideologically loaded concepts like "reunification and national rejuvenation"[20]. The actual character of the relations between the two entities, however, is studied mostly by political scientists and lawyers in Hong Kong.

Hong Kong's scholars examine the process of the PRC influence on HKSAR and the changes in Hong Kong itself using the term "mainlandization" (sometimes they use the term "sinification"[21]). Although the term "mainlandization" is used by journalists and scholars very often, it has not been conceptualized precisely, specifying tiers and modes of China's influence or spheres and directions of changes. The more the term is used, the more blur becomes. Explicit debate on changes in Hong Kong political systems needs more theoretical stance toward the process. Ming K. Chan noticed – "It seems that a satisfactory analytical explanation of this intensifying "Mainlandization" trends are yet to be defined and found among the complicated and complex interface processes involving the HKSAR officialdom, the Hong Kong folks, and above all, the Chinese mainlanders and their CCP/PRC party-state leadership."[22].

Wilson Wong understands "mainlandization" as a process of "moving closer towards the Chinese system"[23]. Kong Tsung-gan, in turn, sees in it the "attempts by the Communist Party and its allies to exert greater control over HK politically, economically, socially and culturally, with the objective of assimilating it and integrating it into the mainland as much as

[18] Lo, *op. cit.*, pp. 15-18.

[19] Loh, Christine (2010): *The Underground Front: The Chinese Communist Party in Hong Kong*, Hong Kong, Hong Kong University Press.

[20] See papers in "Academic Journal of 'One Country, Two Systems'", vol. II.

[21] Mathews, Gordon; Ma, Eric; Lui, Tai-Lok (2008): *Hong Kong, China: Learning to Belong to a Nation*, London, Routledge; Lo, *op. cit.*, pp. 39-41.

[22] Ming K., Chan: "The Challenges of "One Country, Two Systems" Disequilibrium in China's Hong Kong SAR, 1997–2017", *Chinese Law & Government*, Vol. 50, nº 1 (May 2018), pp. 1-9.

[23] Wong Wilson (2003): *From a British-Style Administrative State to a Chinese-Style Political State: Civil Service Reform in Hong Kong After the Transfer of Sovereignty,* Brookings Working Papers, Brookings Institution, Washington, DC.

possible before the end of the 50-year 'one country, two systems' period in 2047"[24]. According to Sonny Shiu-Hing Lo, most scholars are not clear on "mainlandization" and define it as a "trend that the HKSAR's uniqueness is diluted to some degree"[25]. In his own opinion, "mainlandization" refers to the "HKSAR government's policy of making Hong Kong politically more dependent on and similar to Beijing, economically more reliant on the mainland's support, socially more patriotic toward the motherland, and legally more reliant on the interpretation of the Basic Law by the Standing Committee of the National People's Congress"[26].

Apart the most popular definition of "mainlandization" presented by Sonny Lo, other scholars also underline gradual process of absorption of Hong Kong and assimilating it to the rest of China[27]. Li Li emphasize three aspects of "mainlandization": (1) convergence and divergence in the "mainlandization", which is in her opinion a process of dialectical struggle; (2) complicated nature of political and economic change in Hong Kong under the influence of Beijing government and mainland businessmen; (3) politicization of the entire process (Li 2016). Ming K. Chan, in turn, distinguish two levels of "mainlandization"[28]. On the popular level it is defined as an "influx of Mainlanders", and at the "realpolitik level", "mainlandization" is tied to the PRC's global ascendency which leads to demands of "deferential respect".

Table 1. Definitions of "mainlandization"

Author(s)	Definition
Sonny S-H Lo	"policy of making Hong Kong politically more dependent on Beijing, economically more reliant on the Mainland's support, socially more patriotic toward the motherland, and legally more reliant on the interpretation of the Basic Law by the PRC National People's Congress"
Kong Tsung-gan	"attempts by the Communist Party and its allies to exert greater control over HK politically, economically, socially and culturally, with the objective of assimilating it and integrating it into the mainland as much as possible before the end of the 50-year 'one country, two systems' period in 2047"
Ming K. Chan	Popular level: influx of Mainlanders as shoppers, tourists, immigrants. Realpolitik level: the PRC's global ascendency which leads to demands of "deferential respect".
Wilson Wong & Hanyu Xiao	"gradual process of absorption of Hong Kong and Macao, assimilating them to the rest of China"

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[24] Kong, Tsung-gan: "Mainlandization: An overview of Communist Party attempts to control and assimilate Hong Kong" at https://medium.com/@KongTsungGan/mainlandization-an-overview-of-communist-party-attempts-to-control-and-assimilate-hong-kong-93df16cbfe1e

[25] Lo, *op. cit.*, p. 42.

[26] *Ibid.*, pp. 42-43.

[27] Wilson, Wong; Hanyu, Xiao: "Twenty years of Hong Kong and Macao under Chinese rule: being absorbed under 'one country, two systems'", *Public Money & Management*, Vol. 38, No. 6 (July 2018), pp. 411-418.

[28] Chan, *op. cit.*, pp. 1-9.

Li Li	"The concept of "mainlandization" is not only used to describe the process of integration between mainland China and Hong Kong, it also reflects the complicated government and business relationship during the social transformation as well as the moral panic found in Hong Kong nowadays. Particularly, there are three aspects of "mainlandization" that should be
	highlighted: (1) both convergence and divergence exist in the process of "mainlandization", which is a process of dialectical struggle; (2) the concept of "mainlandization" reflects the complicated political-economic change in today's Hong Kong under the influence of Beijing government and mainland businessmen; (3) the term "mainlandization" has been politicized. It has been used as a label in Hong Kong society that contains all negative and bad images of the mainland and its people using services in Hong Kong."
Cora Y. T. Hui & T. Wing Lo	"In the political sphere, "mainlandization" is used to describe an evolving political process in which the Beijing style of political governance and control has gradually been put in place in Hong Kong. It also refers to the covert insertion of "national identity" through various educational, social, and political means to replace the "Hong Kong identity" of local people."
Anthony B. L. Cheung & Paul C. W. Wong	gradual politicization of Hong Kong's civil service to "mainlandization". They argued that the current system of bureaucracy might become less Weberian and more vulnerable to political influences.

Source: Author's own research.

Most of the uses of the "mainlandization" concept focus on the aim of the process — the nature of political and economic changes in HKSAR. Only certain definitions pay attention also to identity transformations[29]. Therefore, the important question is also how the process happens; what are its modes, forms, obstacles and directions. We just need more complex, explanatory and coherent model of process. Thus, the author would like to propose a broader, comparing to the existing definitions, explanation of China's influence on Hong Kong, through a model of "mainlandization".

The basis of the influence of the PRC on Hong Kong is contained in the following framework of facts:

1. HKSAR became an inseparable part of the PRC on 1 July 1997;

2. HKSAR, in accordance with the international agreement between the United Kingdom and the PRC and under the Basic Law, has the right to maintain its autonomy and to regulate its policies until 2047; The Sino-British Joint Declaration signed in 1984 and the HKSAR Basic Law (akin to a mini constitution) introduced general principles that allowed a high degree of autonomy, a government composed of locals, the retention of laws in force prior to the 1997 agreement;

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[29] Hui, Corry Y. T.; Lo, T. Wing: "One Country, Two Cultures: Are Hong Kong Mock Jurors "Mainlandized" by the Predominant Chinese Criminal Justice Concept of Confession?", *International Journal of Offender Therapy and Comparative Criminology*, Vol. 59, nº 10 (September 2015), pp. 1104–1124.

3. The PRC does not have many formal instruments to directly influence HKSAR (due to "one country, two systems" principle); however, there is one critical power that it does have. Article 158 of the Basic Law itself makes absolutely clear that "The power of interpretation of this Law shall be vested in the Standing Committee of the National People's Congress";

4. PRC central authorities want Hong Kong to become "a normal Chinese city" focussed on social and economic issues, not political ones. They are wary of the development of pro-independence and radical anti-Beijing movements. They will do everything in their power to prevent the "Taiwanisation" of Hong Kong;

5. The concept of a "Red line", which if crossed could invite action by the PRC authorities against Hong Kong. Xi Jinping has made it clear that "any attempt to endanger China's sovereignty and security, challenge the power of the central government … or use Hong Kong to carry out infiltration and sabotage activities against the mainland"[30] would be seen as such and thus "absolutely impermissible".

6. Currently there is no real possibility of fundamentally revising the Basic Law and changing Hong Kong's legal status.

3.1 PRC influence on the political reality of Hong Kong

In this situation, the central authorities of the PRC are mainly forced to influence the political reality of Hong Kong through non-formal means, and to accept the core principle of "one country, two systems". Thus, we can conceptualize "mainlandization" taking into consideration the different aspects of the very real PRC influence on HKSAR, as:

1.Attempts to spread and promote, the political values, policy standards and political attitudes of mainland China, and to convince the people of Hong Kong to accept them.

This first mode underlines the ideological aspect of "mainlandization". This can be visibly illustrated by the PRC's attempts to introduce patriotic education in Hong Kong. We may suspect that the attempts to introduce "Moral and national education" are aimed at changing the socio-political attitudes among Hongkongers.

2. Enforcing a process aimed at building a feeling of unity between the societies of Hong Kong and Mainland Chinese. The ultimate aim of these activities is to create a strong Chinese identity based on the concept of "Greater China", and to encourage the idea of the cultural unity of Chinese people. The PRC regularly makes significant investments in the HKSAR cultural sector; one of the major examples is the planned Hong Kong Palace Museum, which is expected to be completed in 2022. It works on building the pride of young people in Hong Kong and the feeling of unity with mainland China by organizing such activities as the visits of the PRC's Olympic winners to Hong Kong or subsidized students trips to mainland China. It should be pointed out that mainlandization also has a bottom-up direction – when unity is not forced by "Beijing" from above, but instead is built up at the grassroots level by Hongkongers.

3.Attempts to force the adaptation of the HKSAR political system to the political system of the PRC. Although "Beijing" does not have the possibility of directly introducing legislation in HKSAR, it uses its influence among HKSAR politicians and businessmen to impose PRC's political solutions on Hong Kong (e.g. the anthem law; curbing down freedom of the press; extradition law).

4. Exertion of influence by the PRC on the decision-making processes in HKSAR.

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[30] President Xi Jinping marks 'red line' in warning to Hong Kong on national sovereignty, https://www.scmp.com/news/hong-kong/politics/article/2100895/president-xi-jinping-marks-red-line-warning-hong-kong

The PRC has been trying consistently to control the decision-making processes in HKSAR. Its most crucial method consists of activities aimed at broadening the process of clientelism with the United Front in HKSAR, Pro-Beijing politicians, and businessmen. Peter T.Y. Cheung explains the PRC strategy towards Hong Kong in simple terms. He points out that one of the aims of the PRC is "expanding the united front and political support network in favour of the Mainland, including the grooming of the second generation of Hong Kong's tycoons and elites as political players"[31].

"Mainlandization" understood in this way therefore means direct and indirect attempts to control the political processes in Hong Kong through various facets of life there, including education, sports, as well as cultural activities. In the course of developments connected to "mainlandization" certain elements may overlap with others and their forms permeate.

3.2 Directions of "mainlandization"

There is not only a quite evident "top-down" direction of "mainlandization" but also, as mentioned earlier, a "bottom-up" movement as well. The top-down process includes attempts to transfer political values or policies to Hong Kong. One of the most important instruments for creating a "favourable environment" used by the PRC is the right of the Standing Committee of National People's Congress (NPCSC) to interpret the Hong Kong Basic Law.

The right was used by "Beijing" to interpret the provisions regarding the oath required to be taken by members of the Legislative Council (LegCo) in such a way as to allow the disqualification of anti-Beijing politicians from the Legislative Council. Other forms of top-down influence are situations when "Beijing" uses its agents in Hong Kong to supervise political processes in Hong Kong according to the CCP vision (e.g. exerting control over anti-Beijing attitudes).

The "bottom-up" political process which also results in the convergence agenda being pushed forward has its own significance. It is based on the adjustment of social institutions to suit the expectations of Beijing. The screening of candidates for the LegCo elections, which on the face of it appears as if it were an independent exercise of electoral officials, is a pertinent example. A very public example is the promotion of the Mandarin language by hotel and shop owners without any directions having been issued by any PRC authority.

3.3 Aspects of "mainlandization"

Transformations resulting from the mainlandization process have their affective, normative and ideological dimensions. The phenomenon of mainlandization can be observed in all aspects of the political system of HKSAR: institutional (changes in structure of political actors, e.g. Hong Kong party system), functional (role modifications of political institutions, e.g. role of Chief Executive or role of "one country, two system" principle), relational (modifications of character of relations between public institutions of HKSAR and mainland China), normative (changes in the legal order, e.g. anthem law debate, extradition law).

Here, areas of mainlandization can be divided according to the classical division among the concepts of "polity", "politics", and "policies".

- **Polity** – the institutional architecture of the domestic system, the normative and structural elements of HKSAR (including the Basic Law, the legal system, inter-institutional relations, and civil servants).

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[31] Cheung, Peter T.Y.: "The Changing Relations between Hong Kong and the Mainland since 2003", in: Wai-man, Lam; Luen-tim Lui, Percy; Wong, Wilson (eds.) (2012): *Contemporary Hong Kong Government and Politics,* Hong Kong, HK University Press, pp. 325-348.

Mainland China has the right to change the Basic Law and thus the entire structure of HKSAR. But it is unlikely that the central authorities of PRC will decide on such a move (especially considering that the main elements of the HKSAR system were negotiated between the UK and the PRC and clearly set out in the Sino-British Joint Declaration). "Beijing" has other instruments in its hands – so far, however, only the right to interpret the Basic Law has been used. Further evidence of "Beijing's" determined expansion of influence is the fact that the Standing Committee of the NPC has twice interpreted the Basic Law without a formal request from HKSAR institutions.

In this sphere, the process of interpretation of the "one country, two systems" principle by the PRC authorities is also crucial, especially the so-called "White paper on the practice of the 'one country, two systems' policy in HKSAR", issued by the Information Office of the State Council of the People's Republic of China on 10 June 2014. The document unambiguously underlines the priority to be accorded to "one country" over "two systems". Comments of PRC's officials also point in the same direction. For example, in 2011, Wang Ganghua, the Head of the Hong Kong and Macao Office of the Chinese State Council, explaining the Chinese point of view, used an analogy from the natural world that left no room for doubt. He said "both the well water and the river water is China's water"[32].

To the "polity" dimension we can also add changes in the HKSAR administration, where the example of more pro-Beijing civil servants being fitted into various roles can be found. The manoeuvrings of electoral officers in excluding localist candidates from the Legislative Council would be a clear example.

- **Politics** – the political discourse or the interaction of Hong Kong actors, interests, ideas, and identities. In the area of "politics", the role of organizations which actively represent the stance of "Beijing" on Hong Kong issues is crucial. Support for the Pro-Beijing camp in the geographical constituencies involved in the LegCo elections fluctuates, but remains above 40 per cent. This fact is an indication of the extent of "Beijing's" influence in Hong Kong. A connected fact is that "Beijing" controls very influential people, including a number of businessmen and media tycoons.

As Beijing triumphs, it can be concluded that the number of participants of the counter-marches to pro-democratic events, which have begun over the last few years, have gained significant public support.

The mainlandization has also influenced the feeling of ethnic identity. According to the HKU polls[33], since 2008 the divergence between citizens claiming Hong Kong identity and Chinese identity has been growing: there is an increase in the number of people strongly claiming Hong Kong identity and of those claiming Chinese identity.

Voices such as Carrie Lam's, which stridently seek to diminish the value of the English language in Hong Kong[34], raise an important question. Do they represent scattered and personal opinions or are they elements of a planned and organized discourse aimed at puncturing the importance of English in relation to the identity of the people of Hong Kong?

There are other important issues connected to the changes in the political discourse in Hong Kong. The intensifying conflict around the "Democracy Wall" at the Chinese University

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[32] Scott, Ian: "'One Country, Two Systems': The End of a Legitimating Ideology?", *Asia Pacific Journal of Public Administration,* Vol. 39, nº 2 (May 2017), pp. 83-99.
[33] *Public Opinion Programme*, at https://www.hkupop.hku.hk/.
[34] Holmes Chan, Video: "Answering questions in English is a waste of time, says Hong Kong leader Carrie Lam", at https://www.hongkongfp.com/2018/07/03/video-answering-questions-english-waste-time-says-hong-kong-leader-carrie-lam/.

of Hong Kong could be an example of the radicalization of discussion forums among students. Also in terms of the wider society, changes in the forms of debates can be observed. Diminishing press freedom is clearly visible. According to the Reporters Without Borders ranking, Hong Kong occupied 18th position in the World in 2002; in 2017 it had slipped to 73rd[35]. There are two reasons ─ self-censorship by journalists and editors, but also physical attacks on journalists.

- **Policy** – public policy in various areas. All cases of changes in particular policies and legislation that resulted in the "mainlandization" of HKSAR – controversial court cases, voting in the LegCo according to Beijing's preferences, etc. Four cases are probably the most visible: the debate around the national anthem legislation, Moral and National Education, discussion about implementation of Article 23 of HKSAR Basic Law, and forcing the extradition law.

3.4 Instruments of mainlandization

It is well established that, mainland China has a limited number of direct and formal instruments to help it achieve "mainlandization", because of the "one country, two systems" principle.

The PRC achieves it goals by:

1. Using the already mentioned interpretations of the Basic Law by the Standing Committee of the NPC;

2. Regulating the influx of mainlanders into Hong Kong on the basis of a two-way permit (a part of that is the Individual Visit Scheme) or a one-way Permit (settlements of up to 150 mainlanders in Hong Kong per day);

3. Funding investments in Hong Kong (economic instrument);

4. Asserting control over important decision-makers (the most powerful instrument):

   a. HKSAR executive (through controlling the process of nomination of the Chief Executive),

   b. political parties (so-called Pro-Beijing parties, such as DAB),

   c. civil society organizations (trade unions, local organizations; non-official CCP members in Hong Kong),

   d. industrial and service tycoons (due to the fact that most of the big businessmen are also entrepreneurs in mainland China, they do not want to act against the CCP),

   e. the media (declining freedom of the press is a fact, also because of the self-censorship of media).

3.5 Intermediating institutions

An important role in the process of mainlandization is played by "intermediating institutions" such as the "one country, two systems" principle itself or the specific political culture of Hong Kong society. If we understand "mainlandization" as a top-down process controlled by the CCP, the "one country, two system" principle, in fact, becomes one of the most important obstacles to the unification of Hong Kong. According to the Sino-British Joint Declaration and the Basic Law, Mainland China cannot establish any formal arrangements that directly influence the Hong Kong judiciary, legislation or fiscal issues. To understand Hong Kong-PRC relations, one must bear in mind that there is a very significant difference in the political culture

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[35] RSF: "Media freedom in free fall 20 years after Hong Kong returned to China", at https://rsf.org/en/news/media-freedom-free-fall-20-years-after-hong-kong-returned-china.

of the two polities which is the outcome of issues related to identity, Cantonese vs Mandarin culture, as well as two opposing political and administrative systems.

Important obstacle for CCP is that Sino-British Joint Declaration has a form of treaty between the PRC and United Kingdom. Drastic changes of "one country, two system" formula can bring international turbulences.

That is why we can perceive the "one country, two system" principle or identity differences of Hongkongers as intermediating institutions in a model of "mainlandization". Chinese influence navigates through these institutions; as a result, there is full or partial adoption of PRC policies and fulfilment of its expectations. There are, however, times and situations in which the outcome is that Chinese policies are not adopted at all.

Fig. 1. Intermediating process

Source: Author's own research.

Concluding: "mainlandization" can be understood as the process of "top-down" transfer and institutionalization of political visions, policy paradigms, procedures, and norms which originate from the PRC and the "bottom-up" adjustment of Hong Kong's institutions. In the process important role play intermediating institutions, such as the "one country, two systems" principle. The phenomenon of mainlandization can be observed in all aspects of the political system: institutional, functional, relational, normative.

4. Effects of mainlandization

Important aspect of mainlandization are also reactions to this process in political system and among society. From a theoretical point of view, we could propose three modes of response to the "mainlandization":

1. Accommodation – a full or almost full adaptation to the mainland norms, preferences, policies, etc.;

2. Resistance – Mainland China norms, policies, etc. imposed on the HKSAR after modifications;

3. Full resistance – No change in the status quo due to e.g. strong resistance to the Mainland influence.

(Table 1 shows cases which illustrate these different responses to "mainlandization").

Table 2. Modes of response to "mainlandization"

Response to the "mainlandization" process	Compatibility of preferences	Effect	Cases	Instruments of "mainlandization"
Accommodation	Preferences of Hongkongers are convergent with the PRC's preferences; or there is significant predominance of Pro-Beijing groups	Change	A number of infrastructural projects (those which cause minimal resistance)	1. Economic incentives (for HKSAR as a whole);
Resistance resulting in modification of policies etc.	Partial incompatibility of the preferences of both sides; no clear dominance of one side over the other side	Transformation	Individual Visit Scheme (IVS) – after protests and criticism of parallel trading, the PRC has limited the number of entrances to Hong Kong; Sinicization of language – progressing bottom-up (hotels and shopkeepers use Mandarin more often) – no top-down regulations on the promotion of Mandarin	2. Suggestions that the PRC may adopt strong solutions toward HKSAR; 3. Attempts to influence ethnic structure (IVS, Mainland Chinese settlements);
Complete or unanimous resistance leading to resignation or withdrawal by PRC	Presence of strong resistance	Lack of change	Extradition law & implementation of art. 23. Hong Kong still has not enacted laws on its own to prohibit any act of treason, secession, sedition, subversion against the Central People's Government (art. 23 of HKSAR Basic Law)	4. Building the network of "clients" of the PRC in Hong Kong (among politicians, activists, students, businessmen)

Source: Author's own research.

Accommodation could mean changes made successfully according to 'Beijing's' will. In most cases, this could happen when the preferences of Mainland China and HKSAR are convergent or when pro-Beijing groups have clear dominance in the decision-making process. *Resistance, resulting in modifications*, on the other hand, means changes in the original expectations of PRC due to e.g. lack of clear dominance of Pro-Beijing groups that could lead to full

implementation of Chinese policies in Hong Kong. Finally, *resignation* occurs in the situation when opposition in Hong Kong to particular aspects of mainlandization is widespread and very strong (e.g. protests that started in 2019 against so called extradition law).

5. "Sinoscepticism"

The important aspect of analysing the process of mainlandization and responses to it is that it causes backlash from members of Hong Kong society. It has been observed that as a response to mainladization, a kind of socio-political attitude of "sinoscepticism" has emerged in Hong Kong. The aim of that part of the article is to signal this growing phenomenon. During focus interviews conducted by the author it was observed among students raising reluctance toward mainland China and raising normative and utilitarian justification of violence.

"Sinoscepticism" is not understood here by the author as an anti-Chinese sentiment, but as a reluctance to accept the PRC's growing influence in Hong Kong and some aspects of PRC politics. Political attitude of antipathy toward mainlandization develops from the affective, behavioral and cognitive judgments but can take various forms, can be observable or latent. "Sinoscepticism" understood that way can be assessed by the various levels of radicalism.

For radicalism in the area of *opinion*, as well as *behaviour*, term "hard-line sinosceptists" can be tagged. "Hard-line sinosceptists" reject any influence from Beijing; they are ready to promote the idea of Hong Kong's self-determination (see table 2) and use of more violent instruments of protests. Recently those attitudes were represented by the so called nativist organizations.

On the opposite side, the so-called "constructive sinosceptists" present a conciliatory attitude and accept a certain level of "Beijing" influence in Hong Kong, recognizing Hong Kong as a special administrative region of the PRC. Thus, they pragmatically recognize the fact that Hong Kong is an inseparable part of the PRC. They also feel a responsibility toward mainland China (e.g. the need to democratize the PRC) (see table 3). "Constructive sinosceptists" do not accept violent forms of protests. They are represented by large part of society, politicized by the traditional democratic parties (mainly by the Democratic Party).

Table 3. Tiers of sinoscepticism

Categories of Sinoscepticism	Features	Political groups*
Hard-line sinosceptists	Rejection	Localists, nativists, pro-independence
Sinosceptists	Contestation	Traditional Pan-democrats/radical democrats
Constructive sinosceptists	Dilemmas	Traditional Pan-democrats

* Indicated political groups are only to show very general lines of divisions
Source: Author's own research.

As it was noticed opposition groups also differentiates the use of instruments of protest (see table 4). More radical groups are keener to use forms of violence as such instruments (like it was observable during so called Fishball revolution in 2016 when protesters violently clashed with Hong Kong police).

Traditional pan-democrats have stronger feelings for citizens of mainland China, and a sense of responsibility in relation to their freedoms and rights. In the view of Nativists

meanwhile, the responsibility of Hongkongers toward mainland China should be of the same level as that toward any other society in the world.

Table 4. Subjects of Sinoscepticism

	CCP and communism	Deterioration of "OCTS" principle	"Han culture" and responsibility towards Mainland China
Doubters (e.g. traditional Pan-democrats)	+	+	-
Contesters (e.g. radical democrats)	+	+	+/-
Rejectionists (e.g. localists, nativists, pro-independence)	+	+	+

(+) – resistance
(-) – lack of resistance
Source: author's own research.

Table 5. Accepted instruments of protests

	Right of assembly	Civil disobedience	Violence
Doubters	+	+/-	-
Contesters	+	+	-
Rejectionists	+	+	+

(+) – accepted instruments
(-) – not accepted instruments
Source: Author's own research.

6. Conclusions and possibilities for future research

Mainlandization as a critical challenge for Hong Kong-mainland China relations should be further studied without political prejudice or preconceptions. Additional research can also lead to a model of mainlandization which may be applicable more generally. Advance conceptualization can combine elements, so far presented separately in the political science literature – instruments, actors and effects of the mainlandization process – in a more coherent and in-depth model. One of the goals of the model conceptualized in this article was to propose the combination of mainlandization with the process of backlash in society (sinoscepticism).

"Mainlandization" can be understood as a process of encroachment upon the rights and identity of Hong Kong. It is a process of imposing political visions, rules, procedures, policy paradigms, "ways of doing things", and of transferring norms from the People's Republic of China to Hong Kong's political system. The preliminary model of mainlandization includes

top-down and bottom-up directions of change which lead to transformation of the party system, administration, legitimacy of polity, functioning of the "one country, two systems" principle and relations with NPCSC. Transformation is carried out within the framework of the "intermediating institutions". All aspects of life (polity, politics and policies) are affected by this process. The most important instrument in the case of HKSAR is the exercise of PRC influence over important decision-makers in Hong Kong.

However, the process is not always smooth. We can indicate three modes of responses to the mainlandization: accommodation, resistance faced by pro-PRC elements leading to modification of PRC policies, and widespread resistance and public protest leading to the withdrawal of PRC policies. As an effect different forms of reluctance reveals. It is clear enough that further mainlandization can lead to more conflict situations between HKSAR and mainland China. It remains to be seen how the situation develops. Table 6 illustrates possible scenarios on the basis of the model of mainlandization. Youth protests that started in March 2019 in Hong Kong, although not finished during the preparation of this article can show raising radicalization of protesters and lead to growing number of persons labelled above as "rejectionists".

Table 6. Possible directions of conflict

	Growing discrepancies	Decreasing discrepancies
Large existing discrepancies	Overt/actual Conflict	Tensions
Small existing discrepancies	Covert/potential conflict	Harmony

Source: author's own research.

There is sufficient evidence to show that excessive PRC influence and attempts to control the Hong Kong polity result in a backlash from citizens, here named "sinoscepticism". Backlash can result in different levels of radicalization. For this reason, it may be useful to focus future research on examining whether there may develop within Hong Kong society a kind of "pillarization" along its deepening political cleavages, the possible effects of such a development, and the role of nostalgic deprivation[36] as a reason for radicalization.

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