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### The lotus, the orchid, and the dragon: an examination of One Country, Two Systems and its trajectory in Xi Jinping's China.

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The Lotus, the Orchid, and the Dragon: An Examination of One  
Country, Two Systems and its Trajectory in Xi Jinping's China

By Eric M. Bush

A Thesis  
Submitted to the Faculty  
of the College of Arts and Sciences of the University of Louisville  
in Partial Fulfillment of the Requirements  
for graduation *summa cum laude*  
and for the Degree of Bachelor of Arts in Political Science

Department of Political Science  
University of Louisville  
Louisville, Kentucky  
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This thesis is dedicated to my brother

**Christian Bush**

Whose unwavering guidance and example  
made it possible for me to write this thesis

## **Abstract**

Xi Jinping has prioritized National Rejuvenation, a new pillar in the Chinese social contract based on the view that western powers exploited China during a Century of Humiliation and now, under the Communist Party, China is reclaiming its former glory. As China approaches its centennial in 2049, the CPC has prioritized fully reunifying and integrating Taiwan, Hong Kong, and Macau with the mainland. Through a comparative analysis of Hong Kong and Macau's demographics and political and economic institutions, this thesis examines the current status of the One Country, Two Systems policy and anticipates its trajectory under Xi Jinping.

## **Lay Summary**

After Mao Zedong led the Communist Party of China (CPC) to victory in the Chinese Civil War, its Nationalist opponents fled to the island of Taiwan where they have governed themselves independently from the mainland since the People's Republic of China's establishment in 1949. Macau and Hong Kong, small cities in southeast China, also remained independent from the mainland, ruled by Portugal and the United Kingdom, respectively. China has long sought to reunite these territories under the rule of the CPC.

In 1997 the United Kingdom returned Hong Kong to Chinese sovereignty under a policy called One Country, Two Systems. China would control Hong Kong's foreign affairs and defense, but Hong Kong would retain its western economic and political systems, maintaining significant autonomy from the mainland for at least 50 years. Portugal returned Macau to the mainland in 1999 under a similar arrangement. Now more than two decades since the handovers, Hong Kong and Macau have charted substantially different paths; while Hongkongers complain that the mainland has violated the city's semi-autonomy, Macau has embraced further integration with China.

Now under the leadership of Xi Jinping, the CPC has attempted to promote a nationalistic sentiment through National Rejuvenation, a policy based on the view that China, exploited by the west during a Century of Humiliation, is now returning to its rightful place in history under the CPC. A major component of National Rejuvenation is reunifying with Taiwan and fully integrating Hong Kong and Macau into the mainland. Through a comparative analysis of Hong Kong and Macau's demographics and political and economic institutions, this thesis examines the current status of the One Country, Two Systems policy and anticipates its trajectory under Xi Jinping.

## Introduction

In August 2019, Hong Kong marked its twelfth straight weekend of anti-government protests. Protestors chanted their five demands – including the immediate resignation of chief executive Carrie Lam – amidst an onslaught of tear gas and newly deployed water cannons. Yet just 40 miles away in neighboring Macau, citizens witnessed an ordinary Sunday as Ho Iat-Seng was unceremoniously elected Macau’s chief executive, receiving 98 percent support from the city’s pro-Beijing electoral committee.<sup>1</sup>

Macau and Hong Kong are similar in many ways. Both cities, former European colonies that reverted to Chinese sovereignty at the end of the twentieth century, share close geographic proximity and are governed under China’s One Country, Two Systems policy. Yet the direction of the two cities has sharply diverged: while Hongkongers increasingly reject further integration with mainland China, the Communist Party of China (CPC) lauds Macau for recognizing that “one country” is “the prerequisite and basis” for “two systems” – in other words, accepting the Chinese government’s hand in the city’s governance.<sup>2</sup>

Through the lens of Hong Kong and Macau, this thesis will explore China’s One Country, Two Systems policy and its significance as a core component in Xi Jinping’s National Rejuvenation policy. Based on an analysis of Hong Kong and Macau’s demographics and political and economic institutions, this thesis will also project how the cities’ relationships with mainland China will evolve in the coming years.

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<sup>1</sup> Carvalho, R. (2019, August 25). “Ho Iat-seng will be new city leader of Macau, China’s gambling hub.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/asia/article/3024253/ho-iat-seng-will-be-new-leader-macau-chinas-gambling-hub>

<sup>2</sup> Xinhua. (2019, December 21). “Xi laud's Macao's ‘shining chapter’ of “one country, two systems” practice.” Retrieved from *Xinhua*: [http://www.xinhuanet.com/english/2019-12/21/c\\_138647103.htm](http://www.xinhuanet.com/english/2019-12/21/c_138647103.htm)

## **One Country, Two Systems: A Means to an End**

Chinese reunification has been a perennial goal for the CPC, and One Country, Two Systems is merely a means towards achieving that goal. The policy was formulated for Taiwanese reunification when it became clear that after decades of military confrontation Taiwan was no closer to reunification with the mainland than it was in 1949. Through this policy, China abandoned its “stick” approach and instead offered Taiwan a “carrot.”

Though the CPC began using the term “One Country, Two Systems” in 1984, the policy’s origins date to 1978, when the CPC softened its approach towards reunifying with Taiwan, adopting a policy of “peaceful reunification.”<sup>3</sup> Over the next several years, China gradually formulated this policy, culminating the day before National Day in 1981 when then National People’s Congress Chairman Ye Jianying promised “nine guarantees” to Taiwan including granting Taiwan significant autonomy as a special administrative region and allowing Taiwan to maintain its military.<sup>4</sup>

In 1982, as China and the United Kingdom began negotiations over Hong Kong’s future, China realized its newfound Taiwan policy could be adapted to Hong Kong. The Chinese government passed Article 31 of the Chinese State Constitution authorizing the establishment “of special administrative regions” with the systems in each SAR to be determined based on the “specific conditions” in each region, paving the way for Hong Kong and eventually Macau’s reunification under One Country, Two Systems.

Implementing One Country, Two Systems in Hong Kong allowed China to achieve two key objectives. First, allowing Hong Kong to maintain its western-style political institutions

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<sup>3</sup> Chao, C.-M. (1987). "One Country, Two Systems: A Theoretical Analysis." *Asian Affairs: An American Review*, 107-124.

<sup>4</sup> Ibid.

increased the likelihood of the city's continued prosperity. This not only benefited Hong Kong, but also mainland China; the city's proximity to the mainland, mature financial system, and western legal system made the city an ideal safe harbor from which investors could take advantage of China's economic boom. Second, the successful implementation of One Country, Two Systems in Hong Kong and later in Macau – particularly by respecting the cities' autonomy – could demonstrate to Taiwan that reuniting with the mainland under a similar arrangement could work.

### **One Country, Two Systems and Xi Jinping**

Decades later, One Country, Two Systems is facing a serious challenge in Hong Kong, where millions of protestors believe the mainland has infringed upon Hong Kong's autonomy, particularly through its attempt to pass a bill that would authorize the extradition of Hong Kong residents to mainland China.

Despite setbacks in Hong Kong, reunification — including reassuming sovereignty over Taiwan and the full integration of Hong Kong and Macau — is more important than ever for the CPC as it seeks to expand its mandate as China's ruling party. Historically, the Chinese social contract has been a tradeoff of civil and political rights in exchange for stability and prosperity. Shiping Hua notes that “the Chinese legal system was not built on...ideals, but on the pragmatic consideration of the elites...to protect its people from the other states.”<sup>5</sup> Coming out of the Warring States period, the Chinese were willing to accept a strong, authoritarian Qin government as a matter of life or death. In its absence, chaos would ensue, preventing China from growing the food its people needed to survive.

This arrangement persists in modern China, with the Communist Party basing its legitimacy on the same two pillars as the Qin empire: stability and prosperity. This is evident in

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<sup>5</sup> Hua, S. (2019). *Chinese Legal Culture and Constitutional Order*. New York: Routledge.



what Chinese leaders talk about and how they are evaluated for promotion. In this author's experience, when asked why China is not a democracy, most CPC elites will cite social stability. They will comment, for example, that "China is not ready for democracy" and note that much of China's population is still relatively uneducated, not to mention the political instability found in many developing democracies. Regarding provincial leaders' performance evaluations, perhaps the most important factor is their ability to maintain order – especially through strong public safety measures. GDP growth is a very close second.

However, China's slowing economy jeopardizes one of the two pillars of the Chinese government's legitimacy. The CPC has worked to manage expectations, guiding for slower future economic growth while still touting the government's previous economic success. But most significantly, Xi Jinping has abandoned the post-Mao Chinese government's purely pragmatic approach and has added a third pillar to the Chinese social contract: National Rejuvenation.

National Rejuvenation relies on the belief that China suffered at the hands of the West during a so-called "Century of Humiliation," stretching from the start of the First Opium War until the establishment of the People's Republic of China. During a 2019 visit to Macau, Xi explained that "only by knowing the nation's history of humiliation after the Opium War, can one understand the Chinese people's strong yearning for national rejuvenation."<sup>6</sup> By creating a nationalistic sentiment, and accentuating a history of western abuse, the CPC hopes that the Chinese people will find a new element of legitimacy in a more assertive and aggressive government even if the CPC fails to deliver economically.

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<sup>6</sup> Xinhua. (2019, December 21). "Xi laud's Macao's 'shining chapter' of 'one country, two systems' practice." Retrieved from *Xinhua*: [http://www.xinhuanet.com/english/2019-12/21/c\\_138647103.htm](http://www.xinhuanet.com/english/2019-12/21/c_138647103.htm)

Xi has made reunification with Taiwan — along with further integration of Hong Kong and Macau — “key tenets of his ‘Chinese dream’ of national rejuvenation.”<sup>7</sup> By taking back what China perceives as rightfully belonging to mainland, the CPC can claim credit for restoring China to the glory it historically enjoyed. For Xi, reunification is a core part of his legacy and an urgent priority, something he says “shouldn’t just be handed down unfinished from generation to generation.”

Reunification is also personal; Xi’s father, Xi Zhongxun, served as Communist Party Chief in Guangdong (the province bordering Hong Kong and Macau) from 1978-80, the same time the CPC was formulating the One Country, Two Systems policy. “Xi Zhongxun,” considered a relatively moderate member of the CPC, “became the face of the People’s Republic to Hong Kong after the nightmare of the Cultural Revolution...We know that Xi Jinping cares a lot about his father’s legacy,” writes Joseph Torigian.

Between 1985-2002, Xi spent the formative years of his career serving in a variety of roles in Fujian – the mainland province closest to Taiwan. Xi would have been intimately familiar with cross-strait relations, which were rapidly improving during his time in Fujian. In 1987, the Taiwanese government allowed its citizens to visit the mainland for the first time since 1949, and in 1991 Taiwan ended its state of war with the mainland leading to direct, high-level talks between the two sides.<sup>8</sup> In the backdrop of this improving relationship, Xi likely believed that Taiwanese reunification was in the party’s grasp only to be ripped away amidst increasing tensions in the late 1990s.

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<sup>7</sup> Chun, H. W., & Page, J. (2019, September 27). “For China’s Xi, the Hong Kong Crisis Is Personal.” Retrieved from *Wall Street Journal*: <https://www.wsj.com/articles/for-chinas-xi-the-hong-kong-crisis-is-personal-11569613304>

<sup>8</sup> “Timeline: Taiwan-China relations since 1949.” (2019, January 2). Retrieved from *Aljazeera*: <https://www.aljazeera.com/news/2019/01/timeline-taiwan-china-relations-1949-190103011354919.html>

Xi's career also heavily involved Hong Kong and Macau. During the five years immediately preceding his elevation to president, Xi led the Central Coordination Group for Hong Kong and Macau Affairs, making him intimately aware of China's challenges and opportunities in those regions.

Now, as president, Xi views Chinese unification as an unfinished task from his career, a key reason why Xi plans to remain in office beyond the customary two terms that previous Chinese leaders have served. Unlike his post-Mao predecessors who largely governed as technocrats, Xi sees his role differently. Xi frequently references China's thousands of years of civilization, indicating that he sees himself playing a prominent role in his dramatized view of history. Just as the Qin dynasty is remembered for unifying China after the Warring States period, Xi hopes his dynasty will be remembered for reuniting China with Hong Kong, Macau, and Taiwan.

## **Colonial History**

While Hongkongers engaged in large-scale protests throughout the latter half of 2019, Beijing repeatably praised Macau, earning it the nickname "Beijing's golden child."<sup>9</sup> The origin of the two cities' divergent paths dates to their colonial experiences and the institutions (or lack thereof) established by their respective colonizers.

### **Portuguese Administration of Macau**

Unlike Britain, which seized Hong Kong as a spoil of the First Opium War, Portugal's arrival in Macau was peaceful. Portuguese merchants who had developed trading relationships with their Chinese counterparts originally settled the territory during the Ming Dynasty. After the Portuguese helped capture the notorious pirate Zhang Silao, the Sino-Portuguese relationship

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<sup>9</sup> Siu, P. (2019, December 17). "20 years after handover: can Beijing's golden child Macau grow up to be more than the world's casino capital?" Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3042331/20-years-after-handover-can-beijings-golden-child-macau>

significantly improved.<sup>10</sup> In 1573 the Portuguese formalized their presence through a signed agreement with local authorities; in exchange for an annual rent of 500 silver taels, the Chinese allowed Portuguese merchants — not soldiers — to reside in the city, but not to exercise sovereignty over the territory.

Throughout several centuries, the Portuguese incrementally expanded their presence in Macau but avoided open confrontation with Chinese authorities. They installed a Catholic bishop in 1586 and in 1605 built up defensive capabilities, including a city wall, to thwart Dutch attacks. But the Chinese maintained significant power within the city. During the tensions leading up to the Opium Wars – a series of trade-related skirmishes between China and European powers – the Qing Dynasty even established a customs station in Macau to seize contraband before it made its way up the Pearl River to Canton. Finally, in 1887, the Chinese and Portuguese entered the Sino-Portuguese Treaty of Friendship, clarifying Macau’s status under “perpetual occupation” but, in the eyes of the Chinese, ensuring the China retained sovereignty over the territory.<sup>11</sup>

In the decades following the Opium Wars, Macau’s status as a major port diminished, and the colony was eclipsed by the newly formed British colony in Hong Kong. Macau’s economy stagnated, and the Portuguese lost interest in administering the colony, allowing gambling, prostitution, and other vices to prop up the city’s fledgling economy. During World War II, Japan never formally occupied Macau, respecting the Portuguese government’s neutrality. In 1966, Macau experienced Cultural Revolution-inspired riots and the Portuguese effectively lost control of the city. “The Portuguese governor was handed a list of demands from the Chinese community,

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<sup>10</sup> da Silva Rêgo, A. (n.d.). “DIRECT SAILINGS BETWEEN MACAO AND BRAZIL: AN UNREALIZABLE DREAM?” (1717-1810). Retrieved from Macau Cultural Affairs Bureau: <http://www.icm.gov.mo/rc/viewer/20022/1059>

<sup>11</sup> Lin, J. (1997, July 3). “The other land reverting to China Macau: This Portuguese-run enclave an hour north of Hong Kong by ferry is not as fast-paced as its modern neighbor, but it, too, is being turned over to China.” Retrieved from *Baltimore Sun*: <https://www.baltimoresun.com/news/bs-xpm-1997-07-03-1997184009-story.html>

including the promise to crack down on activities by the Nationalist Chinese in the enclave,” writes Jennifer Lin. “Humiliating the colonial rulers further, Red Guards who had infiltrated Macau took to the streets to direct traffic.”<sup>12</sup>

Unlike the British government in Hong Kong, which responded to its own Cultural Revolution-inspired protests by embarking on major governmental reforms, the Portuguese in 1974 attempted to return the territory to China; Mao refused.<sup>13</sup> Historians cite three reasons for this refusal. First, China, emerging from the Cultural Revolution, had its hands full with domestic concerns. Second, China remained still largely closed off from the outside world and relied on Hong Kong and Macau as a medium through which to communicate with the west and obtain hard currency. Finally, at that time the CPC prioritized reunifying with Taiwan before Hong Kong and Macau. However, one thing was clear: China had near de facto control in Macau and it was only a matter of time before it became de jur.

Seemingly giving up on the colony after the riots, Macau’s Portuguese administrators reduced investments in education, public security, and infrastructure. Back home, Portugal faced its own political turmoil, culminating in the anti-colonial Carnation Revolution in 1974. In Portugal’s 1976 constitution, the now democratic country declared that Macau was only under temporary Portuguese administration. Three years later, China and Portugal signed the *Acta Secreta*, a secret memo in which the two sides agreed that though Portugal administered Macau, it

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<sup>12</sup> Lin, J. (1997, July 3). “The other land reverting to China Macau: This Portuguese-run enclave an hour north of Hong Kong by ferry is not as fast-paced as its modern neighbor, but it, too, is being turned over to China.” Retrieved from *Baltimore Sun*: <https://www.baltimoresun.com/news/bs-xpm-1997-07-03-1997184009-story.html>

<sup>13</sup> Barrios, R. (2019, December 4). “Thank Lisbon for Macao's Peacefulness.” Retrieved from *Foreign Policy*: <https://foreignpolicy.com/2019/12/04/macao-hong-kong-china-colonial-portugal/>

lacked sovereignty over the territory. The memo also allowed China to call for negotiations at any time over Macau's status.<sup>14</sup>

Knowing its time in Macau was ending, Portugal attempted to revitalize the colony prior to its impending 1999 handover to China. Portugal had a tainted colonial record and hoped to somewhat rehabilitate its image, exiting Macau with some dignity intact. Yet by the 1990s Macau had become a disorderly place overrun by criminal organizations called triads. Violent crime was rampant, with one observer describing “gang-land style shootings” outside of Macau's most prominent casinos.

Leading up to the handover, it also became apparent that, as a result of Portugal's minuscule investment in the Macanese education system, the local population lacked the training and experience necessary to run the city's government. In cooperation with the Portuguese government, China allegedly sent 12 promising mainland legal graduates – none of whom had any ties to Macau – to Portugal to study the Portuguese language and legal system.<sup>15</sup> The Chinese government then embedded them in the Macanese government in the mid 1990s prior to the handover. Today they are among Macau's highest-ranking officials.

Despite Portugal having a presence in Macau for more than four centuries, in just 20 years since the handover Portugal is now an afterthought in modern Macau. Even at the time of the handover, Macau lacked a strong Portuguese identity. Macau's 2001 census revealed that only three percent of the population could speak Portuguese.<sup>16</sup> In contrast, Britain ruled Hong Kong for

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<sup>14</sup> Mendes, C. A. (2013). “Portugal, China and the Macau Negotiations, 1986-1999.” Hong Kong: Hong Kong University Press.

<sup>15</sup> Siu, P. (2019, December 17). “Beijing sent team of mainlanders to study law in Portugal, placed them in top Macau jobs after return to China.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3042420/beijing-sent-team-mainlanders-study-law-portugal-placed>

<sup>16</sup> Barrios, R. (2019, December 4). “Thank Lisbon for Macao's Peacefulness.” Retrieved from *Foreign Policy*: <https://foreignpolicy.com/2019/12/04/macao-hong-kong-china-colonial-portugal/>

just over a third of the time Portugal ruled Macau, yet a survey also conducted in 2001 indicated that 38.8 percent of Hongkongers could speak English, a number that had risen to more than 50 percent by 2016.<sup>17</sup>

### **British Administration of Hong Kong**

Britain's history in Hong Kong dates to 1841 when Captain Charles Elliot secured the island's cessation from China. Upon hearing the news, British foreign secretary Lord Palmerston castigated Elliot for taking a "barren island" that he believed would never become "a mart of trade."<sup>18</sup> Elliot initially seized the island as a tactical move to provide a base near the mouth of the Pearl River. But shortly thereafter, he authorized the auction of real estate and began building infrastructure without the consent of the British government. One year later, the Treaty of Nanking made the cessation of Hong Kong permanent. Despite Elliot being recalled back to London for ignoring Lord Palmerston's orders, Elliot's decisive actions made "the establishment of Hong Kong as a British colony...fait accompli before the Cabinet had resolved the matter one way or the other," and in 1843, the British government reluctantly made Hong Kong an official crown colony.<sup>19</sup>

The nascent colony's territory expanded over the next half century, first in 1860, when China permanently ceded the tip of Kowloon, then in 1898, when Britain secured a 99-year lease of the "New Territories," which comprised 235 small islands around Hong Kong and 287 square miles of territory north of Kowloon.

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<sup>17</sup> Lo, K. (2019, August 21). "The trouble with trying to turn Hong Kong's young people into 'patriotic youth'." Retrieved from *South China Morning Post*:<https://www.scmp.com/news/china/politics/article/3023606/trouble-trying-turn-hong-kongs-young-people-patriotic-youth>

<sup>18</sup> Dimpleby, J. (2018). *The Last Governor*. South Yorkshire: Pen & Sword Books.

<sup>19</sup> Ibid.

Initially, Hong Kong was an unruly place, described by one resident as a “resort of outlaws, opium-smugglers, and, indeed, all persons who had made themselves obnoxious to the Chinese laws.” Triads operated openly in the city, and the situations became so bad that in 1845, governor Sir John Bowring authorized vigilante troops to “fire upon with intent or effect to kill” the outlaws, promising that “no Act done or attempted in pursuance of this Ordinance shall be questioned in any court.”<sup>20</sup> The British also enacted discriminatory measures against the Chinese living in the colony, seeking retribution for the Europeans’ poor treatment at the hands of the Chinese government in Canton.

In 1967, thousands took to the streets in support of the Cultural Revolution, encouraged by Red Guards from the mainland. It became clear that Hong Kong’s institutions needed reform, and then-governor Sir Murray MacLehose launched a drive to root out corruption. Scores of police officers were arrested for their involvement in organized crime and the newly reformed police department became known as “Asia’s finest.” Now relatively corruption free, Hong Kong has become one of “the most attractive financial-services centre in the region.”<sup>21</sup>

The government adopted a laissez-faire economic approach, which, combined with Hong Kong’s improved political institutions, led to soaring economic growth. The city embarked on ambitious infrastructure projects, building a world-class subway system and developing the New Territories. The government also invested heavily in education, and by 1997 Hong Kong, including its world-class port, rivaled any major city in the world.

### **The Handovers**

Though Hong Kong Island and Kowloon were permanently ceded to the United Kingdom, the New Territories were part of a 99-year lease set to expire on July 1, 1997. By the early 1980s,

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<sup>20</sup> Dimpleby, J. (2018). *The Last Governor*. South Yorkshire: Pen & Sword Books.

<sup>21</sup> Ibid.



the New Territories had become deeply integrated into the colony to the point that it would be impractical to separate them from the rest of Hong Kong. Further, CPC leader Deng Xiaoping made clear that China intended to reassert its sovereignty over *all* of Hong Kong in 1997, reportedly telling British prime minister Edward Heath, as Jonathan Dimbleby describes it, that “there would be no role for Britain after 1997.”<sup>22</sup>

Reflecting later about her options, former prime minister Margaret Thatcher noted that she had “very few cards” in her hand. The CPC viewed the Treaty of Nanking as invalid because it was unequal and forcefully inflicted upon China. Though a weak legal argument, China made clear that it would not respect Britain’s sovereignty in Hong Kong after 1997, even over the permanently ceded portions of the colony. “There was no way in which we could defend it [Hong Kong Island and Kowloon],” Thatcher reflected. “More than that...the Chinese could have just turned off the supply of water and food which came from the mainland.”<sup>23</sup>

By 1982 Britain decided that it must begin negotiating with China to ensure Hong Kong’s continued prosperity. Land mortgages in the city typically lasted 15 years, and the uncertainty over Hong Kong’s status after 1997 could severely depress business investment in the city. The HSBC building, completed in 1985, offers one prominent example. The building was constructed primarily of prefabricated blocks, allegedly so it could be quickly dismantled and relocated if things went poorly after the handover.

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<sup>22</sup> Dimbleby, J. (2018). *The Last Governor*. South Yorkshire: Pen & Sword Books.

<sup>23</sup> Ibid.

For Portugal, Macau's handover was a foregone conclusion and only a question of timing. Viewing negotiations over the status of Macau as much less complicated than Hong Kong, the Chinese government opted to complete negotiations with the United Kingdom first.<sup>24</sup>

Early in the negotiations over Hong Kong, China promised to allow Hong Kong to maintain its existing way of life and approximate government structure under the newly formulated One Country, Two Systems policy. In the Sino-British Joint Declaration, China pledged to grant Hong Kong a "high degree of autonomy" for at least 50 years following the handover. Similarly, in the Joint Declaration on the Question of Macau, Macau was also promised 50 years of semi-autonomy.

### **Priorities During the Negotiations**

Despite enjoying strong protections of their individual freedoms, Hongkongers lacked the right to elect most of their political leaders during the British administration of the city. As the handover approached, Britain feared that the mainland would be less benevolent than Britain had been in selecting Hong Kong's leaders. In the wake of the Tiananmen Square Massacre, Britain viewed democratic elections as the only way to ensure Hongkongers' rights would be preserved. To that end, Britain fought to include universal suffrage in Hong Kong's basic law, a series of laws which would serve as a quasi-constitution for the city after the handover. But Britain's position was weak, given that it had avoided instituting democratic reforms during the century and a half it ruled Hong Kong. Ultimately, China agreed to include universal suffrage as an "aspiration" for Hong Kong but refused to make any specific commitments.

Regarding Macau, the Portuguese had a much weaker negotiating position than the British did over Hong Kong. However, Portugal had leverage in its ability (and perhaps willingness) to

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<sup>24</sup> Sinospheres. (2019, March 23). "Looking Back at the Macau Handover." Retrieved from *Medium*: <https://medium.com/greater-china-review/looking-back-at-the-macau-handover-9ff8dd79c301>

unilaterally withdraw from Macau – leaving the city in a state of chaos. This allowed Portugal to extract two important concessions. The first was timing. China hoped to receive Macau at the same time as Hong Kong, but Portugal preferred to keep the city until 2007, the 450<sup>th</sup> Anniversary of the country’s presence in Macau. Though China refused this proposal, it did allow Portugal to maintain control of Macau until December 1999, the tail end of the twentieth century.

The second concession was recognition of Macanese residents’ Portuguese citizenship. Unlike Britain, which refused to provide full British passports to most Hongkongers, Portugal had provided Macanese residents with full Portuguese passports, including work authorization in most of Europe. The Chinese government does not generally recognize dual citizenship but made an unexpected exception for Macau. Though these concessions were not particularly significant, they allowed Portugal to save face and make a dignified exit from one of its last remaining colonies.

### **Attitudes Toward the Handovers**

In Macau, residents expressed general optimism regarding reunification with China. “Maybe we’re less anxious about the handover because we don’t have as much to lose,” remarked prominent Macanese businessman and future chief executive Edmund Ho. Ho continued, “This is so different from Hong Kong, where the attitude is ‘We’re doing well so leave us alone.’ But we need the central government’s intervention because Macau cannot do it alone.”<sup>25</sup> This was painfully obvious in the pre-handover Macanese government’s response to ongoing triad violence, contending that ordinary people need not fear getting caught in triad violence because the murders were carried out “by professional killers who never miss their targets.”<sup>26</sup>

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<sup>25</sup> Lin, J. (1997, July 3). “The other land reverting to China Macau: This Portuguese-run enclave an hour north of Hong Kong by ferry is not as fast-paced as its modern neighbor, but it, too, is being turned over to China.” Retrieved from *Baltimore Sun*: <https://www.baltimoresun.com/news/bs-xpm-1997-07-03-1997184009-story.html>

<sup>26</sup> Vines, S. (1997, May 25). “China ends Triad war in Macau.” Retrieved from *The Independent*: <https://www.independent.co.uk/news/world/china-ends-triad-war-in-macau-1263450.html>

According to some accounts, the Chinese government had already assisted in pacifying Macau prior to the 1999 handover. In 1997, Chinese officials allegedly brokered a truce between two warring triads. Legislator Ng Kuok-Cheng was unsurprised by the rumors. “The Portuguese government can’t control anything in Chinese society, so how do you expect them to control the 14K and Soi Fong [triads]?” Ng questioned.<sup>27</sup>

### **Post-Handover Political Institutions in Hong Kong and Macau**

Hong Kong and Macau both have similar governmental structures, but Hong Kong’s institutions appear to be stronger even amidst the 2019 protests. One area in which the Hong Kong government is comparatively stronger is separation of powers. During a 2008 visit to Hong Kong, Xi Jinping called for “mutual understanding and support among the executive authorities, the legislature and the judiciary” and has echoed that sentiment since.<sup>28</sup> Yet in Hong Kong the branches seem to operate independently. For example, the Hong Kong High Court struck down an emergency ban on wearing masks while protesting, which Hong Kong lawyer Kevin Yam says “speaks volumes for Hong Kong’s judicial independence and the rule of law.”<sup>29</sup> The Hong Kong government’s decentralized powers reflect Britain’s tradition of balancing power between the Crown and Parliament.

Conversely, Macau’s legislative and judicial branches appear to fall in line under the executive. In a letter to the editor of the *South China Morning Post* reflecting on the twentieth anniversary of Macau’s handover to the mainland, Macau resident Barnaby Ieong argues that “the

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<sup>27</sup> Vines, S. (1997, May 25). “China ends Triad war in Macau.” Retrieved from *The Independent*: <https://www.independent.co.uk/news/world/china-ends-triad-war-in-macau-1263450.html>

<sup>28</sup> Xie, E., & Cheung, G. (2019, December 20). “After Xi Jinping’s Macau trip, analysts predict patriotic education and national security in Hong Kong’s future.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3043017/after-president-xis-macau-trip-analysts-predict-patriotic>

<sup>29</sup> Khan, N. (2019, November 18). “Hong Kong Court Rules Mask Ban Is Unconstitutional.” Retrieved from *Wall Street Journal*: <https://www.wsj.com/articles/hong-kong-court-rules-mask-ban-is-unconstitutional-11574057107>

executive and legislative branches of the government work in concert with each other...which is, no doubt, inconsistent with the checks and balances on which justice is greatly reliant.”<sup>30</sup>

Macau’s legislature of 33 members has only four pro-democracy legislators. Noting the legislature’s tendency to rubber-stamp the chief executive’s priorities, pro-democracy lawmaker Au Kam San jokingly said that “Even if the government submits a bill to the legislature that only has a cover and all the pages are blank, it will still be passed.”<sup>31</sup>

Another problem with Macau’s political institutions is that most Macanese *literally* do not know what the law says. Much of Macau’s legal code is written in Portuguese, which less than one percent of the population understands. Macau’s high court no longer has any Portuguese jurists, and the court often ignores large swaths of relevant untranslated Portuguese-language laws. In many regards, Macau’s Portuguese legal system is being squeezed out in favor of one closer to the mainland’s at the expense of the rule of law.<sup>32</sup>

In Hong Kong and Macau, the chief executive is selected through an electoral college, which, in both cities, is decidedly pro-Beijing. In Hong Kong, electors are chosen from functional constituencies that represent various stakeholders. Each of the four constituencies, roughly representing commercial, professional, cultural, and governmental interests, has 300 votes. The commercial and professional sectors strongly align toward Beijing, largely out of economic interests. These constituencies benefit from access to the mainland market that they earn in part

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<sup>30</sup> Ieong, B. (2019, December 20). “Letter to the Editor: Has Macau changed for the better, 20 years since returning to China?” Retrieved from *South China Morning Post*: <https://www.scmp.com/comment/letters/article/3042651/has-macau-changed-better-20-years-returning-china>

<sup>31</sup> Siu, P. (2019, December 17). “20 years after handover: can Beijing’s golden child Macau grow up to be more than the world’s casino capital?” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3042331/20-years-after-handover-can-beijings-golden-child-macau>

<sup>32</sup> Master, F. (2018, October 5). “In Macau, Portuguese elites feel squeezed out by Chinese influence.” Retrieved from *Reuters*: <https://www.reuters.com/article/us-macau-china-law/in-macau-portuguese-elites-feel-squeezed-out-by-chinese-influence-idUSKCN1MF00Q>

because of their loyalty to Beijing’s preferred candidates. They also are skeptical of democracy, which they say would push Hong Kong toward a western-style welfare state with “draconian levels of taxation needed to finance state pensions, unemployment benefits and a national-health service.”<sup>33</sup> The governmental constituency also skews towards Beijing, representing, among other groups, Hong Kong’s delegates to the National Peoples’ Congress, China’s rubber-stamp legislature.

In 2014 the CPC announced that Hongkongers would enjoy universal suffrage in the 2017 chief executive election. The catch is that the two or three candidates permitted to run must be selected by a nominating committee of the same composition as the current electoral college.<sup>34</sup> The nominating committee would effectively have a similar function to the Guardian Council in Iran. However, hundreds of thousands of Hongkongers took to the streets in the Umbrella Protests demanding universal eligibility to stand for election, and the proposal ended up failing in the Legislative Council.

Macau’s electoral college is similar to Hong Kong’s, comprising of 400 members selected from various functional constituencies. Macau’s newly elected chief executive, Ho Iat-Seng, has strong ties to the mainland. The first line of his official bio notes that his “ancestral home” is in Zhejiang province; he also studied in mainland China, was a member of the National People’s Congress, and delivered his inaugural address in Mandarin despite Cantonese being the Chinese dialect traditionally spoken in Macau.

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<sup>33</sup> Dimpleby, J. (2018). *The Last Governor*. South Yorkshire: Pen & Sword Books.

<sup>34</sup> Cheng, K. (2017, February 27). “Explainer: Why Hong Kong’s leadership race is neither free, fair, nor representative.” Retrieved from Hong Kong Free Press: <https://www.hongkongfp.com/2017/02/27/explainer-hong-kongs-leadership-race-neither-free-fair-representative/>

The Hong Kong government also more effectively protects individual rights than its counterpart in Macau. While the Hong Kong government allowed large scale anti-government protests throughout 2019, the Macanese government denied a request to hold a Hong Kong sympathy rally and deployed police to arrest any protestors who showed up.<sup>35</sup> Macau lawyer Jorge Mensezes says that in Macau “people are afraid to voice their opinions” and “freedom of expression is now confined to coffee shops and private spaces.”<sup>36</sup>

Though most limitations to free speech in Macau are the result of self-censorship, residents suffer consequences for speaking out. For example, three professors were fired from Saint Joseph University in Macau ostensibly for political reasons. One of the professors, Eric Sautede, cites two reasons he believes he was fired: he hosted a conference on the Chinese Revolution, and he commented that he believes chief executive Ho Iat-Seng lacks charisma. Rector Peter Stilwell, head of the university, said Sautede crossed the “thin line” from “academic commentary” to “political commentary” and his firing served to “clarify matters.” Stilwell said that he hoped that Saint Joseph’s would not be perceived as “a haven for foreign interests or for local political infighting.”<sup>37</sup> In 2008, Wikileaks released a cable written by the U.S. Consulate in Hong Kong. The cable cited former Saint Joseph rector Ivo Carnerio as saying officials from the Chinese Liaison Office in Macau told the university prior to the handoff that two subjects were off limits

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<sup>35</sup> Melchior, J. K. (2019, December 19). “Why Would Beijing Want to Turn Hong Kong into Macau?” Retrieved from *Wall Street Journal*: <https://www.wsj.com/articles/why-would-beijing-want-to-turn-hong-kong-into-macau-11576799709>

<sup>36</sup> Keegan, M. (2019, December 21). “How China changed Macau, 'the gambling city of the world'.” Retrieved from *The Independent*: <https://www.independent.co.uk/news/world/asia/china-macau-cotai-strip-gambling-democracy-tourism-a9253501.html>

<sup>37</sup> Carvalho, R. (2014, July 22). “Macau scholars warn of rising censorship, loss of confidence in 'one country, two systems'.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/china/article/1557068/macau-scholars-warn-rising-censorship-loss-confidence-one-country-two>

for criticism: “the ‘one country, two systems’ principle; and the Politburo of the Communist Party of China.”<sup>38</sup>

Macau also imposes restrictions on the press. For example, in December 2019 during Ho Iat-Seng’s inauguration, the government denied entry into Macau several pre-accredited journalists.<sup>39</sup> According to Jorge Mensezes, free press in Macau is confined to English and Portuguese language outlets; the “Chinese press is nearly all pro-Beijing.”<sup>40</sup>

Last year, Beijing pushed Hong Kong to implement an extradition bill that would authorize the Hong Kong government to send citizens suspected of a crime in the mainland to stand trial there. Though chief executive Carrie Lam promised that Hong Kong residents would not be extradited for political crimes, Hongkongers were deeply suspicious of the Chinese judicial system and launched wide-scale protests in response.

Another area Hong Kong has resisted mainland influence is in “national security” legislation, which would prohibit actions against the Central Government in Beijing. In 2003 the Hong Kong government attempted to add an article in the city’s basic law that would carry “maximum life prison sentences for treason, sedition, theft of state secrets and subversion.”<sup>41</sup> The bill ultimately failed.

But in Macau, a similar national-security amendment easily passed in 2008 as Article 23 of the city’s basic law. The article is as follows:

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<sup>38</sup> Ibid.

<sup>39</sup> Siu, P. (2019, December 20). “New Macau leader Ho Iat-seng completes transition from 'incapable' candidate to chief executive of casino hub.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3043043/new-macau-leader-ho-iat-seng-completes-transition-incapable>

<sup>40</sup> Keegan, M. (2019, December 21). “How China changed Macau, 'the gambling city of the world'.” Retrieved from *The Independent*: <https://www.independent.co.uk/news/world/asia/china-macau-cotai-strip-gambling-democracy-tourism-a9253501.html>

<sup>41</sup> CNN. (2003, July 2). “Huge protest fills HK streets.” Retrieved from *CNN*: <https://edition.cnn.com/2003/WORLD/asiapcf/east/07/01/hk.protest/>



*Article 23: The Macao Special Administrative Region shall enact laws, on its own, to prohibit any act of treason, secession, sedition, or subversion against the Central People's Government, or theft of state secrets, to prohibit foreign political organizations or bodies from conducting political activities in the Region, and to prohibit political organizations or bodies of the Region from establishing ties with foreign political organizations or bodies.*

The article calls on Macau to “enact laws” to enforce the article, the first of which the city enacted in 2009 as the Law on the Defense of National Security. The act criminalizes sedition, violence, or “other grave illegal acts” against the central government, carrying penalties of up to 30 years in prison.<sup>42</sup> In January 2019, Macau’s legislative council passed a bill expanding the size and powers of the Judiciary Police, granting the agency “exclusive competence” over national security and cyber crimes.<sup>43</sup> The law also waives the government’s requirement to disclose the identity of certain police officers, which one law maker described as creating a “secret police” force.<sup>44</sup> Security Secretary Wong Sio Chak categorically rejected this comparison.

Another area in which Macau has fallen in line with the mainland is “patriotic education,” the mainland’s educational curriculum that teaches its preferred historical narrative of a China bullied and humiliated by the west that is now reclaiming its former glory with the CPC at the helm. During Xi’s visit to Macau in December 2019, he stopped at a local school where he praised Macau’s implementation of patriotic education, sitting in on a history class covering “one country,

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<sup>42</sup> “Macao Special Administrative Region National Security Law (Chinese and English Text).” (2009, February 25). Retrieved from Congressional-Executive Commission on China: <https://www.cecc.gov/resources/legal-provisions/macau-special-administrative-region-national-security-law-chinese-and>

<sup>43</sup> “Lawmakers pass Judiciary Police bill creating 7 new units.” (2020, January 21). Retrieved from *Macau News*: <https://macaunews.mo/lawmakers-pass-judiciary-police-bill-creating-7-new-units/>

<sup>44</sup> Zhu, J. (2020, January 21). “LEGISLATIVE ASSEMBLY | SECRETARY WONG TRADES BLOWS WITH SULU SOU OVER ‘SECRET POLICE’ BILL.” Retrieved from *Macau Daily Times*: <https://macaudailytimes.com.mo/legislative-assembly-secretary-wong-trades-blows-with-sulu-sou-over-secret-police-bill.html>

two systems in Macau.”<sup>45</sup> But in Hong Kong, the government scrapped plans to introduce the curriculum in 2012 amid public outrage.

Another area in which Macau’s government is lacking is public transportation. While Hong Kong has for years enjoyed one of the world’s best public-transportation systems, efficiently getting around Macau is a painful exercise for residents. The city finally opened the first phase of its long-delayed light-rail system in December 2019, eight years after the initial targeted completion date and three times over budget. Ironically, Macau ended up hiring Hong Kong’s MTR Corporation to operate the light rail-system.<sup>46</sup>

### **Economic Institutions**

Hong Kong has been described as a “merchant city,” a pass through that facilitates global trade.<sup>47</sup> For many multinational companies, the city offers a base from which to invest in mainland China. Unlike the mainland, whose state-run banking system prioritizes political interests above economic interests, Hong Kong has a well-developed financial system that can safely manage foreign money. Investors have chosen to establish offices in Hong Kong because they enjoy the city’s independent legal system, in contrast to the mainland’s judiciary, which remains subservient to the Communist Party.

China recognizes the valuable role Hong Kong plays in facilitating foreign investment in the mainland, allowing the country to reap the benefits of liberal institutions without the political consequences of implementing them on the mainland. In this sense, Hong Kong’s economy

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<sup>45</sup> Xinhua. (2019, December 21). “Xi laud's Macao's ‘shining chapter’ of ‘one country, two systems’ practice.” Retrieved from *Xinhua*: [http://www.xinhuanet.com/english/2019-12/21/c\\_138647103.htm](http://www.xinhuanet.com/english/2019-12/21/c_138647103.htm)

<sup>46</sup> “Macau’s first-ever railway to start today.” (2019, December 10). Retrieved from *Macau News*: <https://macaunews.mo/macaus-first-ever-railway-to-start-today/>

<sup>47</sup> Dimpleby, J. (2018). *The Last Governor*. South Yorkshire: Pen & Sword Books.

depends extensively on China but not in a way that the mainland could easily manipulate for political leverage without harming itself in the process.

Macau's economy, significantly less diversified than Hong Kong's, depends on tourism, which contributed 72.2 percent of the city's GDP in 2018.<sup>48</sup> Nonetheless, Macau, the second wealthiest region in the world, boasted a nominal GDP per capital of \$81,728 (\$115,913 when adjusted for purchasing power parity). Macau's economy has soared since the handover. In 2001, the city liberalized its gaming industry, granting new concessions to foreign casino operators. Companies such as Las Vegas Sands, Wynn, and MGM entered the market. Starting in 2015, casino operators built the Cotai Strip — rivaling its counterpart in Las Vegas — on reclaimed land between Macau's two largest islands. Macau's gambling revenues now exceed Las Vegas by six-fold.<sup>49</sup> However, Macau casinos are far less successful than their Las Vegas counterparts in capturing non-gambling revenue. For example, the Venetian Macao earns more than 80 percent of its revenue from gambling operations. In contrast, the Venetian Las Vegas earns less than a quarter of its revenue from the casino floor, leveraging revenue streams such as restaurants, conventions, shows, and hotel rooms.

Along with Macau's newfound prosperity comes increasing dependence on the mainland. Macau's economic rise is closely tied to China's, with tourists from the mainland accounting for roughly 71 percent of Macau's visitors.<sup>50</sup> Mainland residents must gain authorization from the Chinese government to visit Macau, giving Beijing the power to dramatically curtail tourism to

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<sup>48</sup> *Statistics and Census Service*. (n.d.). Retrieved from Government of Macao Special Administrative Region: <https://www.dsec.gov.mo/Statistic.aspx?lang=en-US&NodeGuid=d45bf8ce-2b35-45d9-ab3a-ed645e8af4bb>

<sup>49</sup> Hoium, T. (2018, November 4). "Where Las Vegas and Macau Make Their Money (Hint: It's Not the Same Place)." Retrieved from *The Motley Fool*: <https://www.fool.com/investing/2018/11/04/the-difference-between-las-vegas-and-macau.aspx>

<sup>50</sup> *Statistics and Census Service*. (n.d.). Retrieved from Government of Macao Special Administrative Region: <https://www.dsec.gov.mo/Statistic.aspx?lang=en-US&NodeGuid=d45bf8ce-2b35-45d9-ab3a-ed645e8af4bb>

Macau at will. For this reason, Macau has no alternative to accommodating Beijing's political interests, meaning that "Macau residents, on the whole, prefer to keep quiet, accepting that economic growth since the handover has come at the cost of decreased freedoms."<sup>51</sup>

China also seeks to further economically integrate Hong Kong and Macau into the mainland through its Greater Bay Area economic-development initiative, an ambitious project to create technological, financial, and transportation links among Hong Kong, Macau, and nine cities in southeast China. One of the initiative's most notable projects, the Hong Kong-Zhuhai-Macau Bridge, consists of a 55-kilometer-long series of bridges and tunnels, completed in 2018, that cuts travel times between the cities by hours.<sup>52</sup>

## **Demographics & Geography**

A key distinction between Hong Kong and Macau is size. Hong Kong is substantially larger than Macau in terms of geographic size (427 square miles vs 44.52 square miles) and population (7.39 million vs 622,567).<sup>53</sup> Macau's small population and size make it less independent and consequently more susceptible to Beijing's influence. The city is also in much closer proximity to the mainland. Looking at an aerial view, an unfamiliar observer would struggle to point out the border between Macau and neighboring Zhuhai. In contrast, Hong Kong's central business district is miles from the mainland border.

Another key factor is national identity. In the more than two decades since Hong Kong's handover in 1997, the mainland has failed to impart a Chinese national identity in Hong Kong; in fact, younger Hongkongers appear to be forming a Hong Kong identity distinct from mainland

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<sup>51</sup> Keegan, M. (2019, December 21). "How China changed Macau, 'the gambling city of the world'." Retrieved from *The Independent*:

<sup>52</sup> BBC. (2019, February 26). "Greater Bay Area: China's ambitious but vague economic plan." Retrieved from *BBC*: <https://www.bbc.com/news/business-47287387>

<sup>53</sup> *The World Factbook*. (n.d.). Retrieved from Central Intelligence Agency: <https://www.cia.gov/library/publications/the-world-factbook/>

China. In a recent survey conducted by Hong Kong University, 90 percent of Hong Kong residents between 18 and 29 responded “no” when asked if they were proud to be a Chinese national. In the same survey, only 11 percent of Hong Kong residents identified as “Chinese.” The majority prefer the term “Hongkonger.”<sup>54</sup>

China has attempted to combat this through educational exchange programs that bring Hong Kong students to the mainland. Xu Luying, spokesperson for the mainland’s Hong Kong and Macau Affairs Office, suggested that if young Hongkongers visit “the motherland of China more and broaden their world view, they will come to see that our country is at a crucial stage of renaissance.”<sup>55</sup> But Hongkongers appear uninterested in traveling to the mainland. In a poll conducted by the Hong Kong Guangdong Youth Association and the Proactive Think Tank, less than one quarter of Hongkongers aged 15-39 indicated a willingness to work in neighboring Guangdong province.

Macau residents hold a much stronger mainland identity than Hongkongers. In December 2018, The Hong Kong Public Opinion Research Institute asked Hong Kong and Macau residents to rank how strongly they identified as citizens of the Peoples’ Republic of China, with 10 being strongest. The average response in Macau was 7.82<sup>56</sup> compared to 5.24<sup>57</sup> in Hong Kong.

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<sup>54</sup> Lo, K. (2019, August 21). “The trouble with trying to turn Hong Kong's young people into 'patriotic youth'.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/china/politics/article/3023606/trouble-trying-turn-hong-kongs-young-people-patriotic-youth>

<sup>55</sup> Xie, E., & Cheung, G. (2019, December 20). “After Xi Jinping’s Macau trip, analysts predict patriotic education and national security in Hong Kong’s future.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3043017/after-president-xis-macau-trip-analysts-predict-patriotic>

<sup>56</sup> Public Opinion Programme. (2018, December 10). “People’s Ethnic Identity.” Retrieved from Public Opinion Programme, The University of Hong Kong: <https://www.pori.hk/pop-poll/ethnic-identity/q004a>

<sup>57</sup> Public Opinion Programme. (2018, December 14). “People’s Ethnic Identity.” Retrieved from Public Opinion Programme, The University of Hong Kong: <https://www.pori.hk/pop-poll/macau/people-ethnic-identity>

Hongkongers' identification as PRC citizens has trended downward since surveyors first asked the question in 2007 (see Exhibit A).

Another important measure of the mainland's influence in Hong Kong and Macau is Mandarin language penetration. Traditionally Cantonese has been the preferred Chinese dialect in Hong Kong and Macau, but the number of residents who understand Mandarin has risen sharply in both cities in recent years. According to Stephen Matthews, Professor of Linguistics at Hong Kong University, "Mandarin will rapidly become the lingua franca in shops and taxis. That will happen in Hong Kong, but first it will happen in Macau."<sup>58</sup>

Mandarin is more prevalent in Macau than in Hong Kong, in part because of the large number of mainland tourists who travel to Macau. Consequently, upwards of 90% of casino jobs reportedly require Mandarin proficiency.<sup>59</sup> Outside of tourism, Macau's relatively small size naturally limits opportunities in certain fields, potentially driving Macanese residents to seek jobs in mainland China that require Mandarin. In contrast, Hongkongers do not face this problem with their city's larger population and more diversified economy.

In addition, more than half of Macau's population was originally born in the mainland, with many moving to the city after the handover. The mainlanders have crowded out the Macanese — particularly those with European ethnicity — and imparted mainland attitudes and cultural norms in the city. Macanese resident Barnaby Ieong complained in a letter to the *South China Morning Post* that "Over the past two decades, most policies, such as in housing and civil service,

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<sup>58</sup> "MANDARIN'S GROWING INFLUENCE IN TOWN." (2015, February 24). Retrieved from *Macau Daily Times*: <https://macaudailytimes.com.mo/mandarins-growing-influence-in-town.html>

<sup>59</sup> Ibid.

were seen to favor new immigrants from the mainland, and most senior posts in the government were gradually occupied by them.”<sup>60</sup>

### **Projections for the Future: Macau**

Macau seems poised for further integration into the mainland, and Xi Jinping’s December 2019 visit provides several clues about the city’s trajectory. The Chinese government has expressed concern about Macau’s lack of economic diversity and seeks to inject new sources of economic activity, particularly in the financial sector.

Xi announced plans to establish a stock exchange in Macau to be denominated in the renminbi (RMB), mainland China’s currency, instead of Macau’s currency, the pataca (MOP). The renminbi and Hong Kong dollar are already widely accepted in Macau – in fact, many casinos only accept the Hong Kong dollar – and using the renminbi in Macau’s upcoming stock exchange will further erode the relevance of the pataca.

Macau may seek to discontinue the pataca in the coming years and adopt the renminbi. It would justify doing so for several reasons. First, most visitors to Macau are from mainland China and already widely use the renminbi in the city. Given Macau’s gradual integration into mainland Chinese mobile payment apps, policymakers may reason that it makes little sense to require nearly every transaction to involve a currency conversion.

Second, since the total amount of patacas in circulation is relatively small, a large exchange of patacas for some other currency could materially impact the pataca’s value. To prevent this from happening, Macau pegs the pataca’s value to the Hong Kong dollar. In reality, however, the pataca

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<sup>60</sup> Ieong, B. (2019, December 20). “Letter to the Editor: Has Macau changed for the better, 20 years since returning to China?” Retrieved from *South China Morning Post*: <https://www.scmp.com/comment/letters/article/3042651/has-macau-changed-better-20-years-returning-china>

is largely unusable in financial transactions outside of Macau. This would bode poorly for China's attempt to develop a financial industry in the city if it opted to use the pataca.

Third, Xi has instructed Chinese banks to increase loans within Macau. However, mainland banks do not hold significant amounts of the Macanese pataca and would likely prefer to denominate loans in renminbi. Finally, Macau is rapidly integrating into the mainland's Greater Bay Area economic-development project, which seeks to create a high-tech zone similar to Silicon Valley in Hong Kong, Macau, and several cities in the adjacent Guangdong province. Adoption of the renminbi would facilitate cross-border investments and joint-ventures.

Clearly numerous factors support a switch from the pataca to the renminbi, but abolishing the pataca would shatter a highly visible reminder that Macau is not part of mainland China. Ultimately, this could pave way for a host of incremental moves towards full integration into the mainland.

China is also making moves to loosen Macau's border with the mainland and integrate the city with neighboring Zhuhai. Currently, mainland residents wishing to enter Macau must first go through Chinese exit immigration before going through Macanese entry immigration. However, a newly built checkpoint combines both steps into one e-channel, creating a "joint inspection area" over which both the Mainland and Macau have jurisdiction.

The mainland also plans to lease territory to Macau on nearby Hengqin Island, giving Macau space to develop family-friendly tourist attractions. Chinese planners seek to create an Asian version of Orlando right next to Asia's Las Vegas. If Macau's economic future is literally in mainland China on Hengqin Island, China will have further justification to fully integrate Macau into the mainland by 2049 or possibly sooner.



Finally, Macau residents may face continued erosion of their civil liberties. Macau's Judiciary Police force was recently authorized handle matters of national security (i.e. threats against the central government) as well as cybercrime. The Judiciary Police could combine these powers to target dissenting online speech. Further, given the recent politically motivated ouster of several professors, academics will be cautious about the topics that they research, engaging to some degree in self-censorship.

### **Projections for the Future: Hong Kong**

Throughout Hong Kong's more than two decades under Chinese sovereignty, Hongkongers have successfully resisted numerous Chinese attempts to undermine their autonomy, ranging from patriotic education to national security laws to the 2019 extradition bill. Though the Hong Kong government has attempted to enact these measures, it has backed down when Hongkongers took to the streets in mass.

Despite their success in stopping certain policies, many Hongkongers are pessimistic about the future. One Hong Kong student commented, "Nothing is more important than preserving Hong Kong's core values...[but] I believe that we will be 'mainlandised' by the Chinese political system and structure, and that cannot be altered."<sup>61</sup> According to a Hong Kong University poll, only 33.8 percent of Hongkongers are confident in One Country, Two Systems.<sup>62</sup>

The Chinese government has tolerated Hong Kong's dissent for two reasons. First, Hong Kong still plays an important role in facilitating foreign investment in the mainland. China appears

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<sup>61</sup> Lo, K. (2019, August 21). "The trouble with trying to turn Hong Kong's young people into 'patriotic youth'." Retrieved from *South China Morning Post*: <https://www.scmp.com/news/china/politics/article/3023606/trouble-trying-turn-hong-kongs-young-people-patriotic-youth>

<sup>62</sup> Public Opinion Programme. (2019, August 20). "On the whole, do you have confidence in 'One Country, Two Systems?'" Retrieved from Public Opinon Programme, The University of Hong Kong: [https://www.hkpop.hku.hk/pori\\_table\\_chart/Trust/K006\\_Conf\\_OCTS/K006\\_chart.html](https://www.hkpop.hku.hk/pori_table_chart/Trust/K006_Conf_OCTS/K006_chart.html)

to have recognized this vulnerability, which partially explains why China unexpectedly agreed to liberalizations in its financial system as part of its Phase I trade deal with the United States.<sup>63</sup> Analysts also believe China's interest in developing a financial sector in Macau is in part a hedge against future turmoil in Hong Kong.<sup>64</sup>

Second, Beijing's strategy towards Taiwan has been to "govern with benevolence" in Hong Kong and Macau to demonstrate the viability of the One Country, Two Systems model. The goal is to entice Taiwan to reunify voluntarily with China under a similar arrangement. To that end, China has tolerated Hong Kong's opposition to certain policies.

However, more than two decades after the official implementation of One Country, Two Systems, Taiwanese reunification looks increasingly unlikely. During the extradition-bill protests, unpopular incumbent Taiwanese president Tsai Ing-wen, who is part of a traditionally pro-independence party, saw her support rise from 25 percent to 45 percent, eventually culminating in her reelection.<sup>65</sup> This prompted her opponent from the Kuomintang party, which typically favors closer ties with the mainland, to disavow publicly the One Country, Two Systems arrangement and promise that he would never implement it in Taiwan.

As Taiwan becomes increasingly less likely to accept One Country, Two Systems, China may become less patient with Hong Kong when it does not fall in line with the mainland's wishes. Luo Huining, Director of the Liaison Office of the Central People's Government in Hong Kong, warned in January 2020 that "If national security systems and mechanisms are absent for a long

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<sup>63</sup> Lawder, D., Shalal, A., & Mason, J. (2020, January 15). "What's in the U.S.-China Phase 1 trade deal". Retrieved from *Reuters*: <https://www.reuters.com/article/us-usa-trade-china-details-factbox/whats-in-the-u-s-china-phase-1-trade-deal-idUSKBN1ZE2IF>

<sup>64</sup> Master, F., & Zhai, K. (2019, December 12). "Protest-free Macau to win financial policy rewards from China." Retrieved from *Reuters*: <https://www.reuters.com/article/us-macau-politics-exclusive/exclusive-protest-free-macau-to-win-financial-policy-rewards-from-china-idUSKBN1YG0EJ>

<sup>65</sup> Chun, H. W., & Page, J. (2019, September 27). "For China's Xi, the Hong Kong Crisis Is Personal." Retrieved from *Wall Street Journal*: <https://www.wsj.com/articles/for-chinas-xi-the-hong-kong-crisis-is-personal-11569613304>

time in the city, external forces will be able to carry out infiltration and sabotage activities,” threatening that this could lead to the destruction of the One Country, Two Systems policy.<sup>66</sup> Luo’s suggestion of a lack of confidence in Hong Kong’s status is an alarming break from previous CPC rhetoric.

Hongkongers should not expect consent from China for the democratic reforms they seek. From China’s perspective, it has already shown significant restraint and accommodation in responding to Hong Kong’s political dissent. After all, in 2014 the mainland did offer Hong Kong universal suffrage, albeit with restrictions on who could stand as a candidate. According to Lau Siu-kai, Vice-Chairman of the semi-official Chinese Association of Hong Kong and Macau Studies, “The central government doesn’t demand Hongkongers love the Communist Party. It just hopes Hong Kong people not do anything that would threaten national security.”<sup>67</sup> Now, the CPC may be growing impatient over what it perceives as unwarranted insubordination by Hong Kong.

Pro-democracy advocates in Hong Kong do have some reason for optimism. In 2019’s district council elections, democrats secured a landslide victory, winning 388 seats compared to 124 seats in the 2015 election. This gave them control of 17 of 18 district councils.<sup>68</sup> Though the district councils have relatively minimal power – they focus on local issues such as trash collection – democrats have significant momentum going into elections for the more important Legislative Council.

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<sup>66</sup> Moura, N. (2020, January 20). “HK should learn from Macau when it comes to patriotic education – Liaison Office Director.” Retrieved from *Macau Business*: <https://www.macaubusiness.com/hk-should-learn-from-macau-when-it-comes-to-patriotic-education-liaison-office-director/>

<sup>67</sup> Xie, E., & Cheung, G. (2019, December 20). “After Xi Jinping’s Macau trip, analysts predict patriotic education and national security in Hong Kong’s future.” Retrieved from *South China Morning Post*: <https://www.scmp.com/news/hong-kong/politics/article/3043017/after-president-xis-macau-trip-analysts-predict-patriotic>

<sup>68</sup> “Hong Kong district council elections: winners and losers.” (2019, November 27). Retrieved from *South China Morning Post*: <https://multimedia.scmp.com/infographics/news/hong-kong/article/3039600/hong-kong-district-council-elections-2019/index.html?src=social>

There is a narrow path for democrats to gain control of the Legislative Council. The Legislative Council has 70 members, only half of which are elected democratically. Of the 35 democratically elected seats, pro-Beijing parties hold a plurality with 16 seats. But if democrats repeat their success from the district council elections, they could conceivably win a significant majority of the 35 democratically elected seats. Thirty seats are selected by functional constituencies, primarily representing commercial interests. Democrats currently hold seven of those seats and are unlikely to pick up many more from this segment. The last five seats are selected by the district councils. Democrats currently hold three of these seats and could pick up the remaining two.<sup>69</sup>

However, there is no guarantee democrats will maintain their momentum. Voters may choose pro-Beijing candidates because they are generally more experienced and qualified. Voters may also fear a dramatic change in the status quo and a resulting backlash from Beijing. Finally, the pro-Beijing candidates are typically better funded and organized. Though Hongkongers shockingly rebuked the pro-Beijing establishment in the district council elections, the establishment will have had a year to reshape its message leading into the Legislative Council elections. Further, democrats may even lose seats from the functional constituencies, which are more susceptible to Beijing's influence.

## **Conclusion**

With the establishment of the People's Republic of China in 1949, China ended its Century of Humiliation, and 70 years later, Xi Jinping has prioritized National Rejuvenation as a core part of the CPC's legitimacy and his personal legacy. As China approaches its centennial in 2049 —

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<sup>69</sup> "Know the Legislative Council Members." (2020, January 3). Retrieved from Legislative Council Secretariat Education Service Team: <https://www.legco.gov.hk/education/files/english/Factsheet/Factsheet1.pdf>

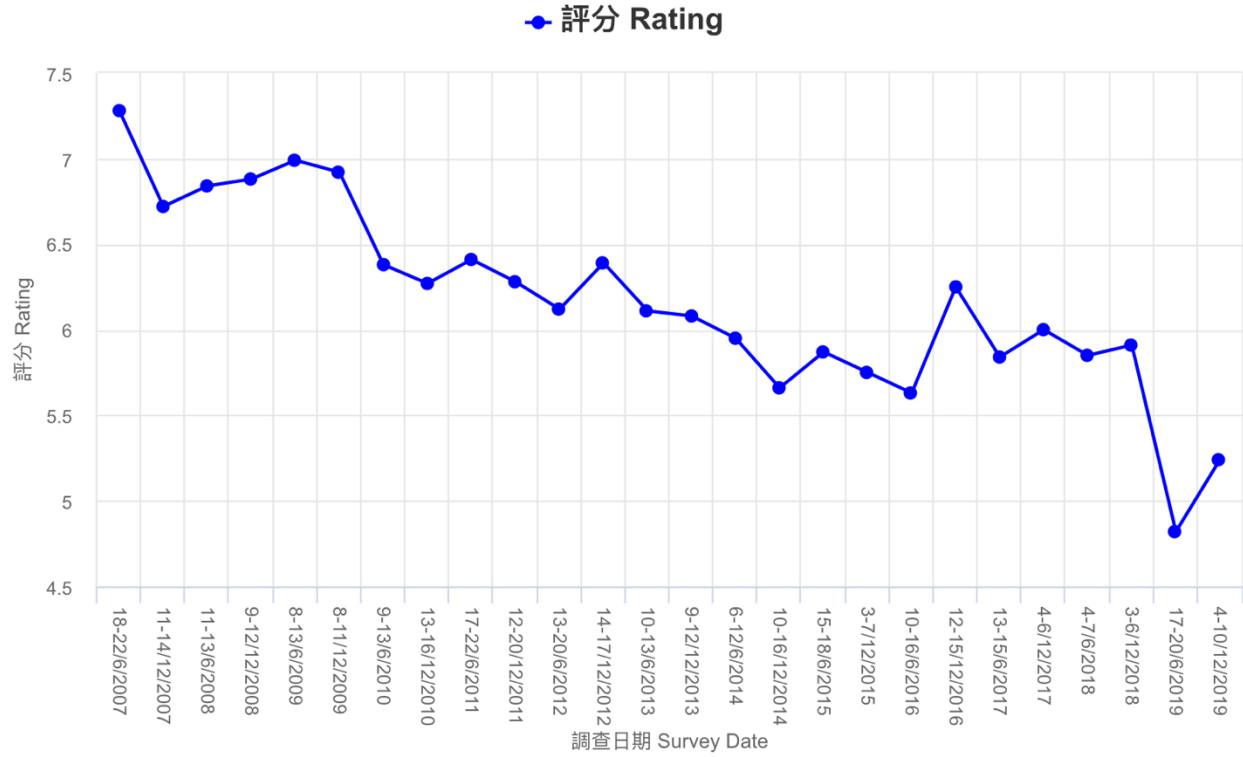
the same year in which Macau's autonomy expires — China seeks to cement a Century of Rejuvenation with the full reunification and integration of Hong Kong, Macau, and Taiwan.

Hong Kong and Macau's unique colonial histories, economic and political institutions, and demographics have led the cities to follow divergent paths. As Hong Kong continues to resist China's influence, Macau has staked its economic future on integration with the mainland. However, if One Country, Two Systems fails to yield the CPC's desired results, the party may seek to move away from the policy under the guise of national security as it increases the urgency of its integration efforts.

In the U.S., lawmakers closely follow China's implementation of One Country, Two Systems and passed the Hong Kong Human Rights and Democracy Act in late 2019 in an effort to promote Hong Kong's semi-autonomy. However, policymakers should remember that although One Country, Two Systems is an important policy for the Communist Party of China, it is merely a means toward a greater end — National Rejuvenation.

## Exhibit A

Please use a scale of 0-10 to rate your strength of identity as a Citizens of People's Republic of China, with 10 indicating extremely strong, 0 indicating extremely weak, and 5 indicating half-half. How would you rate yourself? (Per Poll)  
(6/2007 - 12/2019)



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