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Is Patriotism Just Obedience? Hong Kong Under the National Security Law

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On June 30, 2020, the Chinese government imposed a National Security Law (NSL) on Hong Kong in response to sustained pro-democracy protests. Five years following its enactment, political repression in the city and beyond has markedly intensified. Despite the NSL's contravention of the Sino-British Joint Declaration, there remains little academic research into the law's ideological and discursive origins. This paper traces how the People's Republic of China (PRC)'s longstanding definition of patriotism, encapsulated in Deng Xiaoping's call for a "love for the motherland and for Hong Kong," underpins contemporary narratives of sovereignty and loyalty. Although the NSL was a direct response to the 2019 protests, the deeper roots of Hong Kong's political discontent lie in the unfulfilled promise of universal suffrage. During the protests, demonstrators articulated five demands, including the Bill's withdrawal, an independent inquiry into police brutality, and, overarchingly, the realisation of universal suffrage elections.

This article makes three interrelated arguments. First, the ambiguous wording of the Sino-British Joint Declaration has allowed the Chinese government to discursively reframe, and ultimately subvert, its promise to permit Hong Kong to popularly elect its own autonomous government. Second, while Deng Xiaoping's vision of "one country, two systems" already contained the seed of conditionality in requiring Hong Kong's leaders to demonstrate "love for the motherland and for Hong Kong," this phrase was broadly understood in 1984 as a general call for patriotism and prosperity rather than strict political loyalty. Only with the 2014 Standing Committee of the National People's Congress (NPCSC) decision did Beijing narrow this notion into a demand for absolute obedience to the Chinese Communist Party (CCP), effectively redefining universal suffrage as conditional on political loyalty. Third, the NSL operates as an instrument of ideological control over exiled Hongkongers, extending beyond Hong Kong to challenge the sovereignty and autonomy of democratic states. Hong Kong's exile in recent years has largely been facilitated by the British government, offering British National (Overseas) {BN(O)} status holders a pathway to settlement and British citizenship from January 31, 2021. This offer was made in response to China's violation of the Joint Declaration after the Chinese government imposed the NSL on Hong Kong.

In this study, relevant documentary data were obtained from: (a) Deng Xiaoping's speech to a select group of Hongkongers on October 1, 1984; (b) the "31 August" decision paper of 2014; and (c) a 2021 Hong Kong government statement on the NPC's deliberation on improving the electoral system to implement "patriots administering Hong Kong." By tracing the continuities and shifts in Beijing's discourse of sovereignty and patriotism, this article highlights how the NSL represents not only a local mechanism of repression but also a global challenge to democratic governance and international law.

Love for the Motherland?

The first extract I wish to examine is Deng Xiaoping's speech in 1984 to a delegation of Hongkongers attending the

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National Day celebration in Beijing:

Among those who have come for the celebrations are people from different walks of life and with different political views. This shows that you all favour China's resumption of the exercise of sovereignty over Hong Kong and the agreement reached between the Chinese and British governments. It follows that we all have the same important prerequisite, love for the motherland and for Hong Kong, and that we all share the same goal, to maintain prosperity and stability in Hong Kong over the next 13 years and after (Deng 1994, 80).

Deng's speech was delivered in Chinese but was translated into English and published by Foreign Language Press. The excerpt above illustrates the use of presupposition and framing strategies. Deng assumes that, although his audience consisted of "people from different walks of life and with different political views," they would all support the transfer of sovereignty. By acknowledging this spectrum of attitudes toward Hong Kong's future governance, Deng attempts to imply a consensus favouring the "resumption of the exercise of sovereignty over Hong Kong." By framing the handover as a "resumption" of sovereignty, Deng implies that China historically held sovereignty over the British territory. To legitimise this claim, he seeks to erase Hong Kong's colonial history, portraying Hong Kong as being occupied by a foreign power and its sovereignty rightfully "resumed" by China in 1997. This hegemonic narrative is an early example of historical revisionism, a perspective that continues to be reinforced today through the Citizenship and Social Development curriculum aimed at Hong Kong youth.

The phrase "love for the motherland and for Hong Kong" holds significant importance, having later been established as a formal prerequisite for candidacy in Chief Executive elections. This prerequisite was later reinterpreted as loyalty to the Party, rather than reflecting a broader or more inclusive conception of patriotism. This point will be elaborated later; however, it is first necessary to consider the definition of "motherland." According to the definition in Longman (n.d.), "motherland" refers to the country of one's birth and emotional attachment. For Hongkongers holding British Dependent Territories citizenship (BDTC) at the time, the UK functioned as a symbolic motherland, providing political security and protection from the CCP. But in the context of the phrase "resumption of the exercise of sovereignty over Hong Kong," we can reasonably assume that Deng presupposes Hongkongers' "motherland" is the Chinese mainland. This presupposition thus represents a manipulative tactic that enforces a shared conception of the "motherland."

It is unclear whether Deng's call for a "love for the motherland" referred to loyalty to the socialist system or simply to an attachment to the Chinese people. What is clear, however, is that Deng did not equate patriotism with political obedience. Yet, Hong Kong's civilisation was initiated and shaped almost entirely under British colonial rule, except for a brief period of Japanese occupation during World War II. It can therefore be argued that, contrary to Deng's assertion, Hongkongers' conception of the "motherland" is the UK rather than China. For Hongkongers, "love for the motherland and for Hong Kong" under "one country, two systems" can be understood as a commitment to the values inherited from the British Empire, such as rule of law, individual freedoms, and democratic principles, rather than a direct affection for the British people or culture.

This understanding of patriotism is particularly salient in the post-NSL era, as many exiled Hongkongers self-identify as "British Hongkongers" (Yue 2023, 25). The term "British Hongkonger" reflects a sense of belonging rooted in the British Empire, much like Australians of Chinese descent who commonly identify as "Chinese Australians." In that sense, the label "Chinese Australian" often signals cultural or ancestral roots connected to China, but it does not necessarily mean the person feels a strong emotional attachment or love for the Chinese people or contemporary culture in a broad sense. Instead, it might be more about heritage, family traditions, or values such as Confucian principles passed down through generations. Similarly, the term "British Hongkonger" expresses an identification with the political, legal, and social values inherited from British colonial rule.

Deng's hegemonic narrative laid the groundwork for later attempts to shape Hongkongers' identity, ultimately seeking to compel allegiance to a constructed notion of the "motherland." Decades later, this "motherland" conflicted with Hongkongers' British-influenced civic identity. Despite this imposed narrative from the CCP, Hongkongers have largely resisted identification with China. This rejection stems primarily from profound cultural differences between the UK and China. Prior to the 1997 handover, Hong Kong was not territorially, culturally, or politically part of China; it

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functioned as a largely autonomous entity managing its own affairs with institutions inherited from the UK. In terms of identity, many Hongkongers or their ancestors had fled political turmoil in China before 1950 to settle in British Hong Kong. Consequently, the generation Deng addressed would not have felt an emotional connection to CCP-led China.

The Sino-British Joint Declaration and Universal Suffrage

I now turn to the phrase "the agreement reached between the Chinese and British governments." Deng refers here to the Sino-British Joint Declaration, to be signed between the two governments on 19 December 1984. Article 3(4) of the Joint Declaration states that "the chief executive will be appointed by the Central People's Government based on the results of elections or consultations to be held locally" (Constitutional and Mainland Affairs Bureau of the Government of the HKSAR 1984). The wording here is deliberately vague. For the UK, this could be interpreted as implying a form of parliamentary democracy, with genuine local electoral input. However, for the PRC, this ambiguity represents a loophole that enables it to reinterpret the provision in a way that consolidates political control rather than ensuring democratic selection.

The phrase "love for the motherland and for Hong Kong" resurfaced in the 2014 decision paper on the implementation of universal suffrage in the Chief Executive election, which framed the Chief Executive as a person who "loves the country and loves Hong Kong" (Xinhua 2014). To date, neither the decision paper nor Deng Xiaoping's discourse on "love for the motherland and for Hong Kong" has provided a clear definition of the phrase's meaning. However, it can be inferred that the CCP interprets it as a demand for political obedience. To arrive at this interpretation, we must first understand the context in which the decision paper was issued. This context traces the rise of Hong Kong nationalism back to 2012, when the proposed Moral and National Education curriculum was set to be introduced in the 2012–2013 academic year. Student groups across Hong Kong perceived the curriculum as a tool for political indoctrination aimed at enforcing conformity. Joshua Wong, founder of the student group Scholarism, led mass protests by secondary school students that successfully pressured the government to abandon the curriculum.

The forced abandonment of the curriculum was likely perceived by the CCP and pro-Beijing authorities as a significant setback in their efforts to cultivate a politically obedient form of patriotism among Hong Kong's youth. The widespread student-led protests revealed the limits of Beijing's ideological influence and exposed persistent local resistance to state-driven narratives. In response, the CCP intensified its attempts to redefine "love for the motherland and for Hong Kong" as unwavering political loyalty, excluding any form of dissent. This shift is reflected in the 2014 decision paper on Chief Executive nominations, as well as subsequent measures such as the imposition of the National Security Law in 2020 and the 2021 legislative electoral reforms, which have sought to institutionalise this narrower, more coercive conception of patriotism.

Framing this narrow form of patriotism as a prerequisite for nomination redefines what many Hongkongers have long understood as liberal patriotism: loyalty to the state combined with the right to criticise its policies. Using an othering strategy, the decision paper excludes candidates committed to Hong Kong's democratic traditions by limiting eligibility to those approved by a Beijing-aligned nominating committee. Returning to my earlier argument, the ambiguity in Deng Xiaoping's original use of the phrase left it open to such reinterpretation, enabling the CCP to reframe it as a tool for political screening. The slogan "[?]?[?]?" ("love the country and love Hong Kong") functions as the key criterion for eligibility to hold the Office of the Chief Executive. This shift was made explicit in the "31 August" decision paper, which formalised political loyalty as a criterion for candidacy and catalysed the Umbrella Movement. Hong Kong's legislature rejected Beijing's package the following year, leading to the formation of localist political groups. Some of these politicians were elected to the legislature in 2016, but Beijing later disqualified them through a controversial 2017 interpretation of Hong Kong's Basic Law. Confrontation between Hong Kong and Beijing continued to intensify until the imposition of the National Security Law in 2020, after which it became extremely difficult for opposition candidates or movements to operate.

2021 Electoral Reform and Patriots Administering Hong Kong

I now proceed to the Chief Executive's statement following the NPC's deliberation on implementing the principle of

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"patriots administering Hong Kong":

The criteria for a patriot are to respect one's own nation, sincerely support the resumption of the exercise of sovereignty over Hong Kong by the Motherland, and not to impair Hong Kong's prosperity and stability (The Government of the HKSAR 2021).

I have argued elsewhere that Chief Executive Carrie Lam, a home-grown Hongkonger who had served the British Crown throughout her career, embodied universal values (Wong 2024, 7). This was evident in her determination to help the parents of a murdered Hong Kong woman seek justice, prioritising individual rights over collective considerations. Her chosen means, however, was to introduce an Extradition Bill, which would have returned the alleged offender to the jurisdiction where the crime occurred. In doing so, she underestimated the public's distrust of the PRC's legal system and, at the expense of "one country, two systems," provoked mass protests that quickly revived demands for universal suffrage.

The movement escalated to a sovereignty-level challenge when protesters defaced the PRC emblem with black paint on the night of July 21, 2019, a symbolic rejection of Chinese authority over Hong Kong. This appeared to be the turning point at which the CCP assumed full control of the situation and ultimately resulted in the imposition of the NSL in 2020. Lam's public discourse thereafter increasingly echoed CCP rhetoric. Her 2021 statement is evidence of this. In this context, the statement reframes patriotism from a civic virtue rooted in democratic participation into a requirement for political obedience—namely, loyalty to the PRC's sovereignty and policies, acceptance of its authority over Hong Kong, and avoidance of actions the state deems destabilising.

In the extract above, Lam closely mirrors CCP terminology, particularly the phrase "the resumption of the exercise of sovereignty over Hong Kong by the Motherland." She employs a presupposition strategy, assuming her audience accepts that their "own nation" is China and that the "Motherland" refers to the Chinese mainland. However, this presupposition is a "highly marked presuppositional trigger" (Flowerdew 2004,1562). Before the 1997 handover, it would have been politically incongruous to refer to China as "one's own nation." Under "one country, two systems," Hong Kong was promised political autonomy, which would preserve Hongkongers' civic identity and understanding of patriotism. In this context, it is unlikely Hongkongers would have discursively framed China as "one's own nation," given their lived experience under British governance and the inherited civic values Deng promised would endure for fifty years.

Furthermore, Hongkongers holding British National (Overseas) {BN(O)} status, full British citizenship, as well as Canadian, Australian, and other foreign citizenships, had no legal or political obligation to recognise China as "one's own nation." Using a framing strategy, Lam implicitly excludes those who hold alternative views on allegiance, othering them as threatening "prosperity and stability." The statement represents the first explicit government definition of patriotism in Hong Kong, providing a concrete set of criteria for who qualifies as a "patriot." In this respect, Lam's definition aligns with the established expectation of political loyalty to Beijing, now articulated explicitly within Hong Kong's political context. By establishing an explicit definition of patriotism, Lam's statement reflects the conceptual basis used under the NSL to justify charges against those involved in the 2020 unofficial primaries.

The context in which Lam employed the phrase "one's own nation" is revealing. Lam was a beneficiary of the British Nationality Selection Scheme, through which 50,000 heads of households and their families were granted full British citizenship as a safeguard for Hong Kong's future. I have also argued that by obtaining British citizenship under the scheme, Lam's political security at the time rested with the UK as her motherland (Wong 2024, 17). Although she renounced this status upon becoming a principal official, her familial connections to the UK remain. Against this background, her subsequent invocation of China as "one's own nation" and her revoicing of CCP rhetoric represent a clear discursive shift.

This alignment can be understood as an involvement strategy, rhetorically positioning Lam with the PRC-defined national community rather than reflecting her biographical identity. Lam's use of "one's own nation" functions as a discursive move to engage and align with the totalitarian party-state. Just as Patten's "we" constitutes a rhetorical claim to belonging that does not rely on his ethnic identity (Flowerdew 1997, 458), Lam's "one's own nation"

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operates as a strategic involvement move rather than a reflection of personal conviction. In this sense, both pronouns are employed for political legitimacy, but they index different communities of belonging: Pattern aligns with Hongkongers as a distinct political community, whereas Lam aligns with the CCP-defined national community. Although Lam's own family holds British citizenship, making the phrase "one's own nation" potentially ambiguous, her official usage leaves no room for plural interpretation. In post-NSL political discourse, "motherland" is equated exclusively with China, foreclosing recognition of alternative affiliations.

Extraterritorial Reach of the National Security Law

Based on this ideological definition of patriotism, I now turn to how the Hong Kong government has justified pursuing exiled politicians and activists. Before proceeding, it is useful to briefly review the discursive shifts in the notion of patriotism discussed so far. As I have argued earlier, the vague wording of the Joint Declaration, particularly regarding the promise of democracy, has provided Beijing with flexibility to shape Hong Kong's electoral system. The Declaration does not explicitly specify the system, beyond a general promise of universal suffrage. Deng Xiaoping's ambiguous conceptualisation of "love for the motherland and for Hong Kong" was later reinterpreted as a requirement for political obedience under Xi Jinping, as reflected in the 2014 decision paper stipulating that only "patriotic" candidates who "love the country and love Hong Kong" would be nominated by a pro-Beijing committee for public election- a package that Hong Kong's legislature rejected in 2015. To Hongkongers, however, loving the motherland and Hong Kong has historically been understood in terms of the civic values and systems inherited from the British administration under the "one country, two systems" framework. Carrie Lam's 2021 definition of patriotism clarifies what the Hong Kong government now considers "loyalty," forming part of the ideological basis for pursuing those in exile under the National Security Law.

To fully grasp the stakes of this pursuit, however, we must also consider the nationality debates during the Sino-British negotiations (1982–84), which culminated in the Joint Declaration. Among the most fraught issues during these Sino-British negotiations was the nationality status of Hongkongers. One year earlier, the British Parliament had passed the *British Nationality Act 1981* (UK), which divided British nationality into three categories and clarified who was entitled to full British citizenship. Hongkongers were reclassified as BDTC. However, because Hong Kong would no longer be a British Dependent Territory after June 30, 1997, the UK created a new category in 1986: BN(O) status. For those who registered, this category granted a form of British nationality without the right of abode in the UK, while confirming permanent residency in Hong Kong. The Chinese government refused to recognise either BDTC or the replacement BN(O) status and responded by issuing a memorandum declaring that all Hong Kong compatriots will become Chinese nationals at the handover, regardless of any British nationality status they may hold at the time. In other words, Hongkongers' Chinese nationality was not a choice, but an imposition. This arrangement resulted in Hongkongers holding dual nationality, where the non-Chinese nationality, in this case BN(O) status, is only recognised as a "travel document".

This non-recognition of dual nationality constitutes a presuppositional manipulation. By unilaterally asserting all Hongkongers are solely Chinese nationals, the PRC presupposes the legitimacy of its territorial claim, even as no international court has definitively adjudicated Hong Kong's sovereignty. Many middle-class Hongkongers and their families emigrated to Western countries in the post-Declaration era. Many of these families subsequently returned to live in Hong Kong after acquiring foreign citizenship. As a result, these residents may hold multiple nationalities. For instance, a Hong Kong individual may simultaneously hold Chinese citizenship, Australian citizenship, and BN(O) status. As the Chinese Nationality Law does not recognise dual citizenship, the 1996 "explanations" clarified that holders of these foreign passports could use them only as "travel documents" unless they formally declared a change of nationality at the Hong Kong Immigration Department (Immigration Department of the Government of the HKSAR 1996).

But the PRC's presuppositional manipulation has created complexity and confusion surrounding Hongkongers' nationality, even among Hongkongers themselves. Many do not realise, or consciously reject, the Chinese nationality imposed upon them. This is evident when Hongkongers fill in nationality lines on official forms (Jackson 2002, 40). Furthermore, many use the "home return permit" issued by the mainland government to cross into China, often without realising that by doing so, they are effectively declaring themselves as Chinese citizens (Ching 2018, 224).

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While the BN(O) passport's inside cover subtly implies a lingering British connection to Hong Kong, the PRC's unilateral imposition of Chinese nationality on Hongkongers, coupled with Xi Jinping's reinterpretation of "love for the motherland and for Hong Kong," generated confusion and competing understandings of patriotism. This tension laid the groundwork for political conflicts between Hongkongers and the party-state. By imposing Chinese citizenship, the state effectively expected Hongkongers to demonstrate loyalty to the regime, intertwining national identity with political obedience.

Decades later, these nationality issues resurfaced during the 2019 protests. The British government offered cautious support to the movement, and Hong Kong Watch facilitated meetings between UK policymakers and pro-democracy activists. After months of unrest, Beijing bypassed Hong Kong's legislature and imposed the NSL on June 30, 2020. The move was widely regarded as a violation of the Joint Declaration. In response, the UK created a pathway to British citizenship for BN(O) holders and their families. The scheme opened on 31 January 2021, and by 2025, some 166,300 Hongkongers had arrived in the UK (GOV.UK 2025). The Chinese government responded by derecognising the BN(O) passport as a valid proof of identity in Hong Kong to curb the transfer of mandatory provident funds to the UK.

China continues to claim that members of the Hong Kong diaspora are Chinese nationals, regardless of any foreign passports they may hold now or in future. This operates as a form of presuppositional control, in which nationality is imposed rather than consented to, as argued above. By persistently framing Hongkongers as Chinese nationals, Beijing embeds its claim of sovereignty and allegiance as a taken-for-granted truth, thereby foreclosing any alternative identities. The effect is not symbolic: it underwrites China's extraterritorial use of the NSL. The case of Samuel Chu, a U.S. citizen and founder of the Hong Kong Democracy Council, underscores this presupposition. After lobbying for U.S. sanctions on Chinese officials, Chu was targeted with an arrest warrant. The charge reveals how China deploys nationality claims to justify legal actions against foreign nationals who are ethnically Chinese.

In short, under Xi Jinping, the CCP sees Hongkongers as "sons and daughters of the Chinese nation" who must remain loyal to the totalitarian party-state (Ching 2018, 230). These historical and contemporary realities reveal how they enable Beijing to redefine patriotism and enforce ideological control over Hongkongers at home and abroad under the NSL, setting the stage for a broader discussion on the implications for sovereignty, citizenship, and the prospects for self-determination.

Conclusion and Implications

This article has traced the ideological origins of the NSL to Deng Xiaoping's call for a "love for the motherland and for Hong Kong." While Deng originally framed "love for the motherland and for Hong Kong" as a call for stability and an ambiguous form of patriotism, Xi Jinping's leadership has gradually transformed this meaning by capitalising on the Joint Declaration's vague wording concerning democracy. Since the handover, the phrase has been repeatedly reinterpreted, most notably in the 2014 decision paper, shifting from a call for stability to a demand for political obedience. This narrowing of patriotism undermined the democratic participation promised in the Joint Declaration and fuelled cycles of protest and resistance, culminating in Beijing's imposition of the NSL in 2020 and Carrie Lam's subsequent clarification of patriotism in 2021. The complexity and non-recognition of Hongkongers' dual nationality has enabled Beijing to pursue those in exile who criticise it under the extra-territorial reach of the NSL, even when they are foreign citizens.

I wish to conclude this article with some lessons learnt and implications for the future.

First, the NSL demonstrates that the "one country, two systems" framework has faced severe challenges. This recalls the 1959 Tibetan uprising and subsequent exile, highlighting a repeated pattern in China's management of semi-autonomous regions. While Deng originally envisioned Hong Kong maintaining its separate way of life developed under British administration, Xi Jinping's hardline approach has redefined patriotism and aligned Hongkongers with the political expectations embedded in the NSL.

Second, the NSL illustrates the UK's unique response to Hong Kong compared with other former colonies. The

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BN(O) pathway reflects a lingering British sense of responsibility, treating Hong Kong as a "model child" of the empire and providing avenues of escape from political repression that were not extended to other territories. BN(O) status thus symbolises a continuing, albeit limited, British connection and responsibility toward Hongkongers.

Third, Carrie Lam's alignment with the CCP exemplifies a form of "Chinese colonialism" (Tuck & Yang 2012, 4). Internal colonialism involves socialising colonised elites into the coloniser's ideology, ensuring national ascendancy through mechanisms such as policing, education, and cultural assimilation. Lee and Law (2016, 91) further note that colonialism can dispossess the colonised of identity, tradition, and self-representation, while assimilated elites may reproduce the same control over their population. In Hong Kong, these modes of control are evident in the NSL and the revised citizenship curriculum, which reflects the influence of local elites aligned with the CCP and marginalises those who resist assimilation.

These developments illustrate how historical precedents, symbolic instruments like BN(O) passports, and contemporary strategies converge to shape Hongkongers' understanding of sovereignty, identity, and patriotism. They underscore the enduring tensions between Hong Kong's distinct social-political heritage and the CCP's efforts to consolidate authority, with implications for local governance and international relations. Gilley (2018, 168) has argued that the UK could consider recolonising some of its former territories. The case of the BN(O) scheme demonstrates this possibility, as the UK has now opened the door to honour its commitment to 5.4 million Hongkongers under totalitarian oppression. Whether the UK has the political courage to further challenge China's assault on Hong Kong by creating a parallel Hong Kong on its own soil remains an open question.

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Ka Hang Wong is a PhD candidate at the University of Technology Sydney. His thesis provides a historical analysis of BN(O) status and how it evolved from being a token of British nationality into a tool of political resistance against a totalitarian party-state's assault on Hong Kong. He is a regular contributor to E-International Relations on topics related to Hong Kong.