

Hidden Chinese Systemic Rivalry: Hong Kong Economic and Trade Offices in the EU

Iverson Ng



POLICY PAPER

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Policy Paper

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Summary

- This study analyzes changes in the discourse of Hong Kong Economic and Trade Offices (HKETOs) in Europe. It illustrates how the offices have gradually been transformed from apolitical bodies representing Hong Kong's economic and trade interests abroad into political instruments upholding the People's Republic of China's (PRC) national security interests.
- Over the last few years, and especially since the introduction of the National Security Law in 2020, Hong Kong has been increasingly integrated into the larger framework of PRC's political and economic interests.
- The international relations of Hong Kong, known as a globally interconnected business hub, have been dramatically affected by Beijing's curtailment of Hong Kong's autonomy. The US, the UK, the EU and others have implemented various measures to reflect the de facto changed status of Hong Kong. However, the role of Hong Kong in serving PRC interests abroad has so far not been sufficiently acknowledged, especially in the EU.
- A key role in Hong Kong's paradiplomacy is played by HKETOs. There are four Hong Kong offices in Europe out of 14 offices globally. The Berlin office is in charge of eight countries, the London office covers nine, whereas Brussels is responsible for 15 countries. The Brussels office also serves as Hong Kong's liaison with the EU and the office in London represents Hong Kong in the International Maritime Organization. The office in Geneva represents Hong Kong in international organizations based there.
- During 2019-2022, the Hong Kong offices' representatives in Berlin, Brussels and London issued a total of 164 'clarifications' to European media outlets in 13 languages, targeting the EU, 14 EU Member States, the UK and Türkiye. Out of 128 clarifications published in the EU, most of them were reactions to news coverage of the 2019 anti-extradition protests, the 2020 Hong Kong National Security Law, as well as the 2021 electoral overhaul.
- France, the Netherlands, Germany, Italy and Spain were the top priorities for denying the accusations against the Hong Kong government regarding the city's autonomy, freedom, human rights and democracy.
- The Hong Kong offices' discourse on the 2019 Hong Kong anti-extradition protests predominantly focused on defending Hong Kong's autonomy by drawing a clear boundary between the Hong Kong and Chinese Police Forces.

- In reaction to the implementation of the 2020 Hong Kong National Security Law, the Hong Kong offices' discourse focused on Chinese sovereignty, the legitimacy of Chinese interference in Hong Kong's internal affairs, and the powers and responsibilities of PRC government organizations over Hong Kong's autonomy.
- Since the 2021 electoral system overhaul, the discourse of Hong Kong offices has highlighted the PRC's direct control over Hong Kong's electoral system to ensure stability. It has emphasized the supremacy of China's jurisdiction over Hong Kong's autonomous jurisdiction. The understanding of Chinese national security has also been extended to limiting press freedom in the city.

Recommendations

- The European Commission needs to investigate to what extent China has manipulated the HKETOs present in Brussels and Berlin in order to advance PRC national interests within the EU member states. The Commission should make use of its available tools in trade defense and investment screening against Hong Kong whenever necessary.
- As for the European Parliament, the current calls for the HKETOs in Brussels and Berlin to be investigated and possibly banned seem to be politically unrealistic. However, given the institutionalization of the Hong Kong National Security Law and the subsequent politicization of the HKETOs, they, together with Hong Kong Trade Development Council's regional offices and Hong Kong Business Associations, need to be flagged as PRC organizations subject to PRC extraterritorial jurisdiction in every China-related parliamentary resolution.
- The European External Action Service needs to leverage the presence of the EU Office in Hong Kong and Macao, the EU-Hong Kong Structured Dialogue and the annual report on Hong Kong to address the HKETOs' paradiplomatic efforts in Europe. The EU Office in Hong Kong needs to keep the Hong Kong-based chambers of commerce from European countries informed about political risks caused by the implementation of the Hong Kong National Security Law.
- The EU needs to raise the question of the political neutrality of HKETOs in Brussels, Berlin and London during the EU-Hong Kong Structured Dialogue to send a clear message that Beijing must not manipulate Hong Kong's autonomous system.
- The annual report by the High Representative of the Union for Foreign Affairs and Security Policy on Hong Kong needs to dedicate a section on HKETOs' activities in Berlin, Brussels and London to ensure that the European Parliament and the Council are informed about the Hong Kong government's paradiplomatic activities targeting European business, media and politics.
- On the EU Member States level, a Franco-German-Dutch working group is needed to lead the discussion on HKETOs' influence in EU countries' democratic processes following the implementation of the National Security Law. Given that the offices have prioritized France, Germany and the Netherlands as the top three targets in attacking their media's reporting on Hong Kong's development, the informal trilateral working group can facilitate new

EU-wide conclusions on Hong Kong which would call for the suspension of bilateral meetings between the HKETOs and EU countries' representatives until the National Security Law is repealed, and a review of existing bilateral treaties between the Hong Kong government and EU countries.

- Specifically, the lack of legal certainty in post-National Security Law Hong Kong jurisdiction raises questions over the Hong Kong government's international legal commitments, such as the Investment Promotion and Protection Agreements (IPPAs) with 10 EU countries and the Comprehensive Double Taxation Agreements (CDTAs) with 16 EU countries.
- European local governments should recognize the Hong Kong economic and business entities, including the HKETOs, Hong Kong Trade Development Council's regional offices and Hong Kong Business Associations in Europe as PRC-affiliated entities. Considering the presence of Chinese diplomats in various business and investment events hosted by the above entities in European cities, the municipality governments should avoid endorsing the PRC Greater Bay Area project and Belt and Road Initiative through events organized by Hong Kong government-affiliated entities.

Introduction

The 2023 annual report by the EU on Hong Kong published in June 2024 demonstrates the EU's concerns about the political developments in Hong Kong after the implementation of the National Security Law. According to High Representative/Vice-President Josep Borrell, the report “illustrates in great detail the continuous erosion of the rights and freedoms of the people of Hong Kong and the dismantling of the ‘one country two systems’ principle ... These developments undermine trust in the rule of law in Hong Kong and affect Hong Kong’s standing as an international business hub.”¹

However, a thorough recognition of what the changes in Hong Kong mean for the bloc’s ties with it has been lacking. The European Council’s strategic discussion² on EU-China relations in June 2023 only cursorily mentioned Hong Kong. Specifically, in the context of Hong Kong losing its erstwhile sizeable autonomy, there is a lack of awareness of Hong Kong’s paradiplomatic status and how it contributes to the PRC’s position as a systemic rival of the EU. The issue of the Hong Kong government’s overseas representations to the EU and its 27 Member States should therefore be critically assessed.

Hong Kong-style paradiplomacy³ refers to Hong Kong Special Administrative Region (HKSAR)’s capacity to conduct external relations and its government’s participation in international organizations. It challenges the EU’s current self-restrictive diplomatic approach to Hong Kong under the “One Country, Two Systems” framework. Understanding the changes of the HKETOs’ discourse on autonomy, security and sovereignty can help us understand how the PRC is implementing its new policies in Hong Kong and what it means for Hong Kong’s international status and foreign relations.

Methodologically, this policy paper adopts a practical argumentation framework to analyze Hong Kong’s official discourse on the HKSAR’s status within the context of Hong Kong’s paradiplomacy in Europe. Specifically, it analyzes the Hong Kong government’s changing interpretation of a “high degree of autonomy.”

The first chapter will describe the clash between Hong Kong’s autonomous status and the PRC’s efforts to exercise its sovereignty over the region by illustrating the gradual change of Hong Kong’s institutional setting within the principle of “One Country, Two Systems.” Specifically, the implications of the Beijing-imposed National Security Law (HKNSL) in 2020 and other legal changes will be analyzed.

The second chapter will examine the international role of Hong Kong and its overseas interests stemming from its unique status. In the third chapter, the role of HKETOs in Hong Kong’s overall paradiplomacy activities will be analyzed. Finally, the fourth chapter will examine the discourse of HKETOs in Brussels, Berlin and London regarding the 2019 anti-extradition protests, the 2020 adoption of the HKNSL and the subsequent 2021 electoral system overhaul. The analysis will provide a basis for an understanding of how Hong Kong’s autonomy is perceived by the HKSAR government, how Hong Kong’s interests have been redefined in line with those of the PRC, and what it means for EU policies towards HKETOs.

People's Republic of China-Hong Kong Ties

To better understand Hong Kong's paradiplomatic influence in Europe, it is essential to first identify what components constitute the multifaceted, interdependent relations between the HKSAR and the PRC. The complicated institutional set-up in HKSAR tends to lead to the hasty generalization that Hong Kong is either never institutionally autonomous from the PRC or functions almost like a sovereign state.

The PRC's interests in Hong Kong are complex. The fundamental paradox of "One Country, Two Systems" is that the goals of PRC's sovereignty over Hong Kong and the HKSAR's "high degree of autonomy" are mutually exclusive: if the PRC gains full control of Hong Kong's economic development, flow of capital and trade policies, the HKSAR would not be autonomous and this would also strip some of its advantages for the PRC government; on the other hand, if the HKSAR government is free from PRC's influence on setting its trade policy, economic development and financial agreements with third countries, the PRC would lose part of its sovereignty.

The HKSAR became part of the PRC in 1997 after the handover of Hong Kong's sovereignty from the United Kingdom to China. While the Hong Kong Basic Law, the city's mini-constitution, stipulates that the HKSAR is highly autonomous and the Chinese government shall not interfere in local affairs except in defense and foreign relations matters, there are four Chinese official agencies located in the territory. These are the Liaison Office of the Central People's Government,⁴ Office of the Commissioner of the Ministry of Foreign Affairs of the PRC,⁵ the People's Liberation Army Hong Kong Garrison,⁶ as well as the Office for Safeguarding National Security of the PRC's Central People's Government⁷ set up in 2020.

The controversial Hong Kong National Security Office was established on the basis of the Hong Kong National Security Law⁸ put forward and approved by the Chinese National People's Council's Standing Committee unilaterally in 2020. Supervised by the HKSAR government's Committee for Safeguarding National Security, the Office works with Hong Kong Police Force's National Security Department to collect and analyze intelligence and information about national security in the HKSAR, conduct counter-interference investigations and national security reviews, as well as investigate offenses endangering national security.⁹ According to the security law, the Committee includes National Security Adviser directly appointed by the PRC Government, and the Department of Justice has set up a division for prosecution of offenses endangering national security.¹⁰

Hong Kong, just as other PRC sub-national entities, has an office in Beijing, with four HKETOs and 11 liaison units¹¹ in Chinese cities, providing a channel for accelerating the process of political, economic and financial assimilation with the PRC.

Alongside the political control of the PRC over Hong Kong, the SAR is also an important part of China's economy, even if it still functions separately from the Main-

land in many aspects. Apart from Hong Kong's status as the largest global offshore renminbi market and entrepôt for Mainland China, the city is also China's largest source of overseas direct investment. In 2003, the Mainland and Hong Kong Closer Economic Partnership Arrangement (CEPA)¹² was concluded and signed on trade in goods, trade in services, investment, as well as economic and technical cooperation. The agreement provides for zero tariffs on Hong Kong imported goods, preferential treatment for Hong Kong service suppliers in entering into the Chinese market, provision of investment to both service and non-service sectors, as well as consolidation of economic and technical co-operation. As the HKSAR and Chinese governments continue to introduce more liberalization measures since its implementation, CEPA is set to become even more robust.

Hong Kong has also gradually been subsumed under PRC's long-term economic and development strategies. Within China's 14th Five-Year Plan, the "dual circulation" strategy is highlighted. It aims to facilitate the domestic and overseas markets to reinforce each other with the domestic one as the mainstay. Hong Kong plays both a key role in the domestic circulation and as a facilitator in international circulation, providing overseas interests security for the PRC. Hong Kong's main contributions to China's 2035 plan¹³ are to continue its roles as the largest global offshore renminbi center, a Chinese-controlled common law jurisdiction hosting international organizations such as the World Bank and the IMF, and a common law jurisdiction for legal dispute resolution within Chinese international initiatives, including the Belt and Road Initiative (BRI).

BRI is a development strategy launched by the Chinese government to promote economic connectivity and cooperation. The BRI aims at policy coordination, facilitating connectivity, trade and investment, financial integration, and cultural exchanges with targeted countries around the world. As a Chinese SAR, Hong Kong is not a separate entity participating in the BRI, but the HKSAR Government signed the "Arrangement between the National Development and Reform Commission and the Government of the Hong Kong Special Administrative Region for Advancing Hong Kong's Full Participation in and Contribution to the Belt and Road Initiative" in December 2017 to cover the main areas of the BRI, further advancing the development of the Greater Bay Area (GBA, see below), and enhancing cooperation in dispute resolution services.

The PRC's direct institutional influence over the HKSAR Government became more observable when the Chinese Ministry of Commerce established the "Mainland and Hong Kong Belt and Road Task Group" in 2018 to coordinate BRI matters and economic cooperation. In September 2021, the HKSAR Government and the Chinese Ministry of Commerce signed an MoU¹⁴ on enhancing exchanges and cooperation in promoting high quality development of Chinese State-level overseas Economic and Trade Cooperation Zones (ETCZs),¹⁵ including in Cambodia, Vietnam, Pakistan, Zambia, Egypt, Nigeria, Ethiopia, Russia and Hungary. The non-binding agreement entails cooperation on investment, opening of Hong Kong businesses in the ETCZs, cooperation with Hong Kong enterprises, professional services, and exploring ETCZs markets. Given the direct influence of the Chinese Ministry of Commerce, the HKSAR Government's business interests will be further limited by the PRC's interests in consolidating its overseas influence in those ETCZs.

Corresponding to the PRC's strategic interests in Hong Kong's status as an international financial, transportation and trade center in its Five-Year Plan, the Guangdong-Hong Kong-Macao Greater Bay Area (GBA) is a special format of regional cooperation which consists of two SARs, three jurisdictions (Hong Kong, Macau, Mainland China) and nine Chinese municipalities in Guangdong Province. Signed on July 1, 2017, the Framework Agreement on Deepening Guangdong-Hong Kong-Macao Cooperation in the Development of the Greater Bay Area¹⁶ formalized cooperation between the Chinese governmental department and the three regional governments on innovation, technology and connectivity.

In 2019, the Chinese State Council substantiated an Outline Development Plan¹⁷ for the GBA, focusing on the spatial layout for Hong Kong, Macao, Guangzhou and Shenzhen as the core cities for regional development, outlining policy measures for their joint participation in BRI jointly, and consolidating Hong Kong's international role in the legal sector. To institutionalize the Outline Development Plan, Hong Kong's Constitutional and Mainland Affairs Bureau established a GBA development office and appointed a GBA Development Commissioner¹⁸ in November 2020. The plan further drives Hong Kong's economic and financial interests away from Hong Kong's needs for its special status to be recognized by international organizations to the primacy of PRC interests in establishing a regional hub overriding the independent institutions in Hong Kong and also Macao SARs.

LEGAL CHANGES IN HONG KONG SINCE 2020

In 2020, as a result of six-months long anti-extradition protests in which Hong-kongers opposed a proposed Sino-Hong Kong extradition agreement¹⁹, the city faced a constitutional change²⁰ that altered its legal system. On June 30, 2020, after approval by the Chinese National People's Congress's Standing Committee (NPCSC), the Law on Safeguarding National Security in the Hong Kong Special Administrative Region (HKNSL) was listed in Annex III to the Hong Kong Basic Law and took effect later that night in the SAR. To enforce PRC political security in Hong Kong, the HKNSL covers four areas of crimes, including secession, subversion of state power, terrorism, and collusion with foreign forces.²¹

The HKNSL-covered crimes have a wide scope of application in terms of territory and nationality. As an extraterritorial Chinese law, it is not only applicable to all Hong Kong permanent residents residing in the city, but also foreigners who violate the law outside the territory. The HKNSL's applicability also extends to Hong Kong-registered aircraft or vessels.²²

As of May 30, 2024, 297 people in Hong Kong had been arrested for suspected violation of national security since the enactment of the HKNSL. Among the cases, charges on secession, subversion, terrorism and collusion were included. To expand the scope of prosecution, the Hong Kong Police Force's National Security Department has activated the 1938 Sedition Ordinance²³ enacted by the British colonial government in Hong Kong. As the HKNSL continues to be implemented along with the colonial sedition law,²⁴ the independence of Hong Kong's judiciary has come under question, also affecting HKSAR's international ties.

The security law has far-ranging implications. The official concept of Chinese national security in Hong Kong features five areas of security²⁵ – societal, political, economic, critical, and international. The comprehensive legal framework on the all-encompassing concept of national security was further entrenched by the passing of the 2024 Safeguarding National Security Ordinance,²⁶ a local national security law, which was passed by the Hong Kong legislature without democratic opposition.

The implementation of the NSL has worsened Hong Kong's economic and trade relations with the US, UK and EU since 2020. In July 2020, the US unilaterally revoked²⁷ Hong Kong's preferential trade status as an independent customs territory pursuant to the 1992 US-Hong Kong Policy Act.²⁸ Meanwhile, the 2020 EU conclusions on Hong Kong²⁹ which limited EU member states' export of specific sensitive equipment and technologies for end-use in Hong Kong effectively weakened EU-Hong Kong economic ties. The UK, Hong Kong's former sovereign, introduced a new immigration route for British National (Overseas) (BN(O)) status holders,³⁰ drawing more than 200,000 Hongkongers to the UK between January 2021 and March 2024. The new immigration route has created competition between the Hong Kong and British governments to attract young Hong Kong talents.³¹

Hong Kong's political autonomy has been further diminished by the prosecution of 47 Hong Kong democrats in 2021 who intended to coordinate with other pro-democracy candidates to gain a majority in the Hong Kong Legislative Council (Leg-Co). Since then, the Chinese National People's Congress (NPC) imposed an electoral overhaul³² on the LegCo to limit its directly elected seats to 20 out of 90 and impose a screening mechanism based on a "patriots administering Hong Kong" principle. The changes to Hong Kong's legislature have eliminated meaningful opposition, turning the city's law-making organ into an institution serving Chinese security needs.

Under these economic, political and legal developments, the autonomous status of HKSAR has been significantly curtailed, with ramifications for its international status.

Hong Kong's External Relations and Interests

As a Special Administrative Region (SAR) of the PRC, Hong Kong enjoys unique competences to maintain external relations with other sovereign states and international organizations.

Hong Kong's interests are largely defined by its participation in international organizations, free trade agreements with third countries, economic partnerships with external entities, as well as trade and economic agreements with Mainland China. The key industries in Hong Kong are trading and logistics, financial services, as well as professional services and other manufacturing services. Its major export markets for goods are mainland China, Taiwan and the Association of Southeast Asian Nations (ASEAN), standing for 56.7 percent, 12.5 percent and 7.9 percent of total merchandise exports respectively in 2022.³³

Currently, the HKSAR is a member of 104 international intergovernmental organizations in different capacities. As part of the HKSAR's external affairs, the Hong Kong government is competent to participate in both international intergovernmental organizations limited to states,³⁴ and those not limited to states.³⁵ Enshrined by Article 152 of the Basic Law, for international organizations limited to states, the HKSAR Government may participate as a member of the PRC delegation, or in other capacities permitted by the Chinese government and the hosting international organization. In international organizations not limited to states, according to the same legal provision, the HKSAR may participate using the name "Hong Kong, China" as a full member.

One of the key features of Hong Kong's international status is its role as a founding member of the World Trade Organization (WTO). As a separate customs territory from China, the HKETO in Geneva acts as the official representation of the HKSAR Government at WTO and the Trade Committee on Financial Markets of the Organization for Economic Co-operation and Development (OECD).³⁶

Given that Hong Kong is an independent customs territory, the Hong Kong government is competent to conclude Free Trade Agreements (FTAs) with sovereign states and international organizations. In addition to the Hong Kong-New Zealand Closer Economic Partnership Agreement, the HKSAR has signed five FTAs with other countries and international organizations,³⁷ including Georgia, Australia, Chile, the Member States of the European Free Trade Association (Iceland, Liechtenstein, Switzerland and Norway), as well as the ASEAN (Brunei Darussalam, Cambodia, Indonesia, Laos, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Viet Nam). The HKSAR Government commenced negotiations for an FTA with Peru in January 2023.

Hong Kong's paradiplomatic status makes it able to host 127 foreign official representations³⁸ including 64 consulates-general, 55 honorary consulates and eight officially recognized international bodies. Among the consulates-general in Hong

Kong, there are 13 bilateral agreements³⁹ concluded by the Chinese Government regarding diplomatic and consular privileges and immunities of consulates-general from Australia, Cambodia, Canada, India, Italy, Japan, Republic of Korea, New Zealand, Philippines, Russian Federation, United Kingdom, United States of America and Vietnam in the HKSAR. Codified into Hong Kong's local legislation as different ordinances, the Vienna Convention on Consular Relations⁴⁰ has been ratified into Hong Kong's legal system⁴¹ to ensure the legal statuses of individual consulates.

In addition to the EU Office in Hong Kong and Macao, other international organizations such as offices of the Bank for International Settlements, the Hague Conference on Private International Law, the World Bank and the IMF are also present in the territory. In 2022, the Chinese-led International Organization for Mediation (IOMed) Preparatory Office and Asian-African Legal Consultative Organization's (AALCO) Hong Kong Regional Arbitration Office were established to consolidate Hong Kong's role as a legal and dispute resolution services center. To ensure the diplomatic privileges and immunities of relevant staff working at officially recognized international bodies in Hong Kong, the Vienna Convention on Diplomatic Relations⁴² was also codified into two ordinances.⁴³

EU-HONG KONG RELATIONS

Relations between the Hong Kong SAR and the EU were defined by a communication from the Commission to the Council entitled "The European Union and Hong Kong: Beyond 1997."⁴⁴

Under the UN-listed, legally binding Sino-British Joint Declaration on the Question of Hong Kong⁴⁵ which gives the city-state a high degree of autonomy at least until 2047, the principle of "One Country, Two Systems" lays the foundation for the European Commission and the Hong Kong government to communicate directly on economy, trade, investment, customs, visa and other domestic developments in the SAR. The Commission established an Office in Hong Kong⁴⁶ in 1993 and signed a Customs Cooperation Agreement⁴⁷ with the SAR government in 1999. In addition to the Schengen Area Visa-free Agreement⁴⁸ for HKSAR passport⁴⁹ holders since the Schengen acquis came into force in 1999, the Commission also began publishing an annual report on EU-Hong Kong relations in the same year to monitor the situation in the SAR on the basis of two UN human rights covenants applied there.

The EU-Hong Kong Annual Structured Dialogue⁵⁰ started in 2007 in order to formalize EU-Hong Kong relations by fostering bilateral economic ties, further entrenched the EU Office to Hong Kong and Macao's impact on EU-Hong Kong relations as an "officially recognized body" with consular privileges and immunities for the Office Head and staff members accredited by the European Commission.

The anti-extradition protests in 2019-2020 and the subsequent legal changes have led to an increased attention to Hong Kong by the EU and have significantly affected the basis of bilateral relations. A cross-party informal Hong Kong Watch Group⁵¹ in the European Parliament was established in 2020. The Council's conclusions⁵² on Hong Kong adopted in July 2020 set out five areas of policy response to the legal overhaul in Hong Kong as agreed by the 27 EU countries. These included migration

policy changes, a ban on the export of sensitive equipment to Hong Kong, the provision of scholarships for Hong Kong students, support for civil society, as well as the suspension of EU Member States-Hong Kong extradition agreements.⁵³

These new policy measures have reflected the recognition that the distinction between the PRC and HKSAR has been blurring. So far, however, the operation of Hong Kong's representative offices in the EU has not been addressed on the policy level in the EU. This is in contrast to the US, where the Hong Kong Economic and Trade Offices Certification Act was put forward in Congress in 2023. If passed, the Act could lead to the closure of the offices in the US.⁵⁴

HKETOs as PRC's Paradiplomatic Tools

Overseas HKETOs⁵⁵ serve as the de-facto embassies of the HKSAR Government. During the British colonial period, there were overseas Hong Kong Government Offices⁵⁶ situated in London, Brussels, Washington and Geneva, which represented the interests of the colonial government in Hong Kong. After the Sino-British negotiations⁵⁷ on Hong Kong started in 1982, these Offices gradually transitioned to HKETOs to prepare for the handover of sovereignty from Britain to China in 1997.

Funded by the HKSAR Government, the HKETOs (including four offices in mainland Chinese cities and an office in Taiwan which has been temporarily suspended), have an estimated budget of HKD 596.2 million controlled by the Permanent Secretary for Commerce and Economic Development during 2023-2024. In 2022, the total number of HKETO staff was 191.⁵⁸

Set up under the HKSAR Government's Commerce and Economic Development Bureau, the 14 overseas HKETOs are responsible for commercial relations, public relations and investment promotion abroad on behalf of the HKSAR Government. Officially, these representative offices promote Hong Kong's trade and economic interests by establishing and maintaining contacts with host governments, monitoring and reporting on developments that affect Hong Kong, assisting in negotiating trade agreements and promoting business opportunities. Recently, PRC initiatives including the Mainland and Hong Kong Closer Economic Partnership Arrangement,⁵⁹ BRI⁶⁰ and GBA have been embedded into the agenda of HKETOs.

The Chinese-installed institutional set-up is now fully fledged for the PRC to interfere in the HKSAR government's decision-making process in commercial policy. In particular, the Chinese Ministry of Commerce oversees the HKSAR's commercial policy through the Mainland and Hong Kong Belt and Road Task Group established in 2018; the HKSAR's Mainland and Constitutional Affairs Bureau, with a GBA Development Officer within its organization structure, is in charge of the operation of the HKETOs in Mainland China. With the implementation of the far-ranging HKNSL, HKSAR's commercial policy can no longer be independent from PRC commercial policy.

The overseas HKETOs are located in Bangkok, Berlin, Brussels, Dubai, Geneva, Jakarta, London, New York, San Francisco, Singapore, Sydney, Tokyo, Toronto and Washington D.C., covering the Asia-Pacific region, the Middle East, wider Europe and North America. Among the 14 overseas HKETOs, the offices in Singapore, Dubai, London, Brussels and Geneva represent the HKSAR in a number of international organizations.

The HKSAR's strengthened representation in Europe stems from the EU's 2004 enlargement. It led to the establishment of a new office in Berlin and the transformation of the HKETO in Brussels into the head office in Europe. The post-EU enlargement

TABLE 1: THE HKETOS ACCREDITED TO INTERNATIONAL ORGANIZATIONS

HKETO	International organization
Singapore	Asia-Pacific Economic Cooperation (APEC), Pacific Economic Cooperation Council (PECC)
Brussels	European Union (EU)
Geneva	World Trade Organization (WTO), Organization for Economic Co-operation and Development (OECD) Trade Committee
London	International Maritime Organization (IMO)
Dubai	Cooperation Council for the Arab States of the Gulf (GCC)

Source: Compilation by the author.

division of responsibilities among HKETOs in Europe is based on geopolitical development, historical background and language similarities in Europe. According to the HKSAR government's analysis,⁶¹ Germany has both economic significance to Hong Kong and strategic advantage in best serving central and eastern European countries.

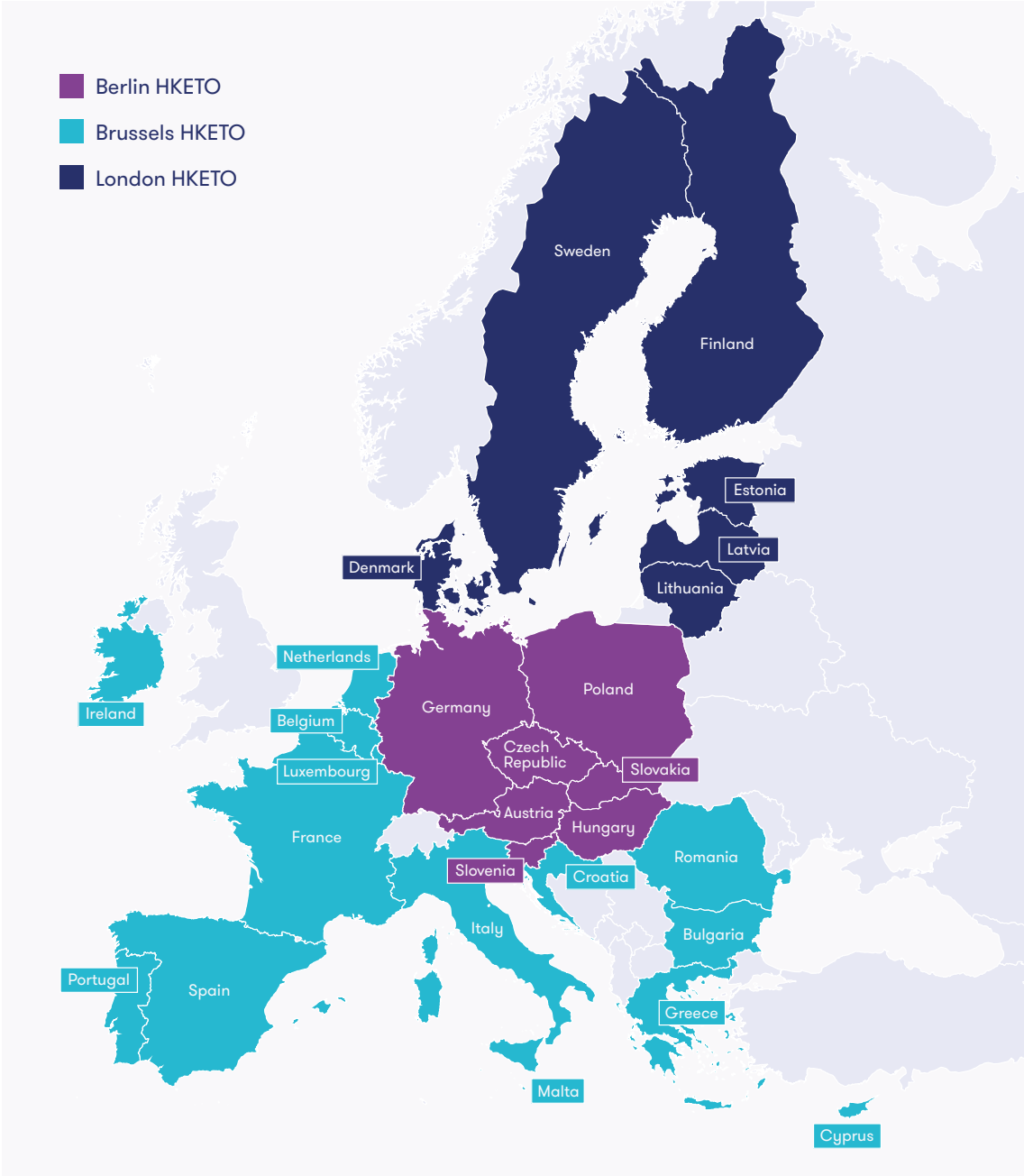
As far as the EU and its 27 Member States are concerned, only the HKETOs located in Berlin,⁶² Brussels,⁶³ and London will be the main focus of this paper. The Berlin office is in charge of seven EU countries and Switzerland, London is responsible for the UK, Russia and seven Nordic-Baltic countries, whereas Brussels covers 14 EU states and Türkiye.

TABLE 2: THE STATUS OF THE BERLIN, BRUSSELS AND LONDON HKETOS

Office	Inviolability	Immunity	Legal personality	Tax exemption
Berlin	premises, archives, documents	full (except in civil proceedings)	no	yes
Brussels	premises, official correspondence, archives, documents	no	no	for representatives only
London	premises, archives	suit and legal processes (except civil proceedings)	yes	specific

Source: Source: Compilation by the author, based on Anouk Wear, "PRC Embassies in Disguise: Hong Kong Economic and Trade Offices are Another Overseas Arm of the CCP," Hong Kong Watch, October 13, 2022, <https://www.hongkongwatch.org/all-posts/2022/10/13/new-hong-kong-watch-policy-paper-calls-for-host-countries-to-review-the-status-and-rebrand-hong-kong-economic-and-trade-offices>.

MAP 1: THE GEOGRAPHICAL COVERAGE OF THE BERLIN, BRUSSELS, AND LONDON HKETOS IN THE EU



Source: Compilation by the author.

The HKETOs in Berlin, Brussels and London operate under different legal arrangements; the Berlin office is the only entity with legal personality whereas the Brussels office is the only one without immunity from the local jurisdiction.⁶⁴

“Ordinance on the Grant of Privileges and Immunities to the Economic and Trade Office of the Hong Kong Special Administrative Region of the People’s Republic of China in Berlin”⁶⁵ and “Hong Kong Economic and Trade Office Act 199”⁶⁶ are the national laws in Germany and the UK defining the special statuses of the HKETOs in Berlin and London. In Belgium, there is no legislation listed at the Belgian Official

Gazette regarding the status of the Brussels-based HKETO. According to a written response from Belgian Foreign Minister Hadja Lahbib, the HKETO in Brussels is only accredited to the EU with certain privileges and immunities without any equivalent diplomatic status enshrined by the Vienna Convention on Diplomatic Relations.⁶⁷

The written response also confirmed that there were limited exchanges between the Brussels-based HKETO and the Belgian Foreign Ministry regarding the activities of the Brussels office and Hong Kong officials' visits to Belgium, as the HKETO in Brussels also deals with Hong Kong-Belgium bilateral relations. While there is no information regarding whether or how HKETOs in London and Berlin mentioned Hong Kong national security-related matters during official exchanges, in the case of the HKETO in Brussels, dialogues on the Hong Kong National Security Law were carried out during official exchanges with the Belgian authorities.

The following aims to analyze how the HKETOs' discourse on Hong Kong's interests has changed since 2019 in order to better understand how the HKSAR's political development impacted its paradiplomatic relations with third countries and international organizations. The main dataset was obtained from a list of clarification letters issued by the representatives of HKETOs in Berlin, Brussels and London published on the website of Brand Hong Kong, a strategic communication program managed by the HKSAR's Information Services Department.⁶⁸ These 'clarification' letters seek to respond to media outlets' coverage of Hong Kong-related issues.

During 2019-2022, the HKETOs' representatives in Berlin, Brussels and London issued a total of 164 clarifications⁶⁹ to European media outlets in 13 languages. Excluding clarifications targeting British and Turkish media outlets which are outside the EU, the Berlin office issued 31 clarifications in German, Polish, Hungarian and Slovak, the Brussels office released 86 clarifications in six languages, and the London office issued 11 clarifications in Danish, Swedish and Finnish. Among the EU Member States targeted, the HKETOs representatives prioritized media outlets in French, Dutch and German languages. Out of 128 clarifications analyzed, most of them were reactions to news articles on the 2019 anti-extradition protests, the 2020 Hong Kong National Security Law, as well as the 2021 electoral overhaul.

Out of the 14 EU countries targeted, France, the Netherlands, Germany, Italy and Spain were the top priorities for the three HKETOs to issue clarification letters in order to spin off accusations against the HKSAR government regarding the city's autonomy, freedom, human rights and democracy. Specifically, the offices issued 39 letters to French media outlets, 20 to German ones, 18 to Dutch outlets, and 13 targeting media in Spain and 10 in Italy.

To better understand HKETOs' interests in targeting these EU countries, the presence of consulates, chambers of commerce, unofficial trade councils and nongovernmental business associations are valid indicators reflecting HKSAR's interests in these selected EU countries.

As of 27 November 2023, the HKSAR hosts consulates from 23 EU countries,⁷⁰ including 16 Consulates-General and 7 Honorary Consulates to maintain their paradiplomatic relations. Moreover, there is a European Chamber of Commerce⁷¹ and 12 EU countries' Chambers of Commerce (including Austria⁷² which is not a member of the European Chamber of Commerce) in Hong Kong. Except Denmark, the HKETOs targeted all EU countries which have a diplomatic presence in Hong

TABLE 3: THE OVERVIEW OF HKETO CLARIFICATION LETTERS

Country	Representation in Hong Kong	Number of HKETO letters issued	Presence of HKTDC regional office	Presence of Hong Kong Business Association	Chamber of Commerce in Hong Kong
Austria	Consulate-General	5		√	√
Belgium	Consulate-General	1		√	√
Cyprus	Honorary Consulate	N/A			
Czech Republic	Consulate-General	N/A	√		
Denmark*	Consulate-General	5		√	√
Estonia	Honorary Consulate	N/A			
Finland	Consulate-General	2		√	√
France	Consulate-General	39	√	√	√
Germany	Consulate-General	20	√	√	√
Greece*	Consulate-General	N/A			√
Hungary	Consulate-General	1	√	√	
Ireland	Consulate-General	2		√	√
Italy	Consulate-General	10	√	√	√
Latvia	Honorary Consulate	N/A		√	
Lithuania	Honorary Consulate	N/A			√
Luxembourg	Honorary Consulate	2			√
Netherlands	Consulate-General	18		√	√
Poland	Consulate-General	3	√	√	
Portugal	Consulate-General	N/A		√	
Romania	Consulate-General	N/A			
Slovak Republic	Honorary Consulate	2			
Slovenia	Honorary Consulate	N/A			
Spain	Consulate-General	13	√		√
Sweden	Consulate-General	4	√	√	√

Source: Compilation by the author. Denmark's Consulate-General in Hong Kong was closed in 2012; Greece's Consulate General in Hong Kong is temporarily suspended from functioning from May 20, 2023.

Kong, including 12 Consulates-General and two Honorary Consulates, indicating that the HKETOs' targets are not directly related to their diplomatic ranks in Hong Kong as Luxemburg and Slovakia seem to have weak ties with the SAR. HKETOs' target countries also either have their respective chambers of commerce present in Hong Kong, or there are Hong Kong Trade Development Council's (HKTDC) regional offices present in Europe.

The HKTDC is a statutory body governed by a 19-member council of Hong Kong business leaders and senior HKSAR Government officials⁷³ to promote Hong Kong's trade and establish connections with small and medium-sized enterprises (SMEs) in global markets. Given the constitution of its governing board, the HKTDC is legally registered in the US as both an agent of a foreign government and a foreign principal conducting lobbying activities.⁷⁴

In a report entitled "The Counter-Lobby Confidential: How Beltway Insiders Do the Hong Kong Government's Bidding"⁷⁵ published by Hong Kong Democracy Council, a US-based nonpartisan organization, the HKTDC spent more than USD 8.3 million on lobbying expenditure in the US, effectively acting as the bridge between the US-based HKETOs and American lobbyists in attempts to block Hong Kong-related legislation such as the Hong Kong Human Rights and Democracy Act.⁷⁶

The HKTDC also serves as the Secretariat of the Federation of Hong Kong Business Associations Worldwide,⁷⁷ a network of 47 Hong Kong business associations in 36 countries and regions, including 18 associations in Europe. These business associations are present in 12 EU countries.

While the HKTDC is the co-organizer of most of the business events in the Brussels and London ETOs, EU-based Hong Kong business associations are the business liaison targets of the HKETOs in Europe. The presence of EU Member States' chambers of commerce in Hong Kong is an indicator of the extent of their business interests in Hong Kong.

Analysis of the HKETO Discourse

The analysis of the clarification letters issued by the HKETOs in Europe illustrates the changing discourse on Hong Kong's autonomy. The analysis below examines the development of the discourse in three stages linked to key milestones in the dismantlement of Hong Kong's autonomy since the anti-extradition protests.

2019 HONG KONG ANTI-EXTRADITION PROTESTS

In April 2019, before the large-scale protests in Hong Kong against the extradition law started, the Brussels HKETO organized the Hong Kong Secretary for Justice's visit to Paris to meet with the Minister for Justice of France, members of the National Assembly of France and the judges of the French Supreme Court to explore possibilities of strengthening Franco-Hong Kong legal cooperation. The Brussels HKETO highlighted in the 2019 HKETOs' report⁷⁸ to the Legislative Council that the office handled inquiries from Hong Kong residents living in Europe. The Brussels, London and Berlin HKETOs' activities were mostly in line with their stated purpose to promote the HKSAR's external relations in 2019.

Between the first time the proposed extradition treaty and related protests were mentioned on August 8, 2019, and May 9, 2020 when the "Chinese Central Government" was first mentioned,⁷⁹ the HKETOs in Berlin, Brussels and London issued 39 clarification letters (including advertisements uploaded in online document form) to the European media outlets in seven EU countries. Most letters designed to promote the HKSAR Government's position on the anti-extradition protests justified the Hong Kong Police Force's use of excessive force in response to Hong Kong protesters, assuring external interest groups that Hong Kong remained autonomous from the Chinese authorities.

In an official letter sent by the Brussels HKETO's representative to a French newspaper, it explicitly defended Hong Kong's autonomy by claiming that the Chinese police was not involved: "It is completely untrue to say that any Mainland police officers have joined the ranks of Hong Kong police officers. Hong Kong police officers are Hong Kong permanent residents who are under the control of the Hong Kong Police Commissioner, no one else."

Given the stated function of the HKETOs to promote Hong Kong as a 'reliable trading partner', the HKETOs' representatives defended the draft extradition agreement by emphasizing that the rule of law would still be applicable to Hong Kong's common law jurisdiction after the implementation of its extradition treaty with mainland China. The HKSAR's political autonomy from the PRC was stressed as the HKETO's representatives claimed that political crimes would not be part of the proposed extradition agreement.

The HKETOs' discourse on Hong Kong's autonomy predominated over that of China's sovereignty during the protest period to appeal to European investors, business groups, government officials and policymakers. Clarifications were made to draw a clear boundary between Hong Kong's system (Hong Kong Police Force) and China's system (People's Armed Police) as there were accusations of Chinese police's infiltration into Hong Kong.⁸⁰ Despite allegations of police-triad collusion and infiltration of Chinese police officers into the Hong Kong Police Force, the HKETOs referred to a number of incidents during the protests and insisted that the situation was still manageable by the HKSAR government alone while upholding the "One Country, Two Systems" principle, implying that there was no need for the Chinese government to intervene directly. In particular, to legitimize the Hong Kong Police Force as a competent law enforcement department, the HKETOs highlighted the presence of the Independent Police Complaints Council which conducted studies on alleged police brutalities during the protest period.⁸¹

As illustrated by the 2019 HKETOs work report to the LegCo, the HKETOs remained defensive on the issue of the HKSAR Government's autonomy. For example, the Brussels HKETO's four meetings with "relevant" European Commission departments in May, June and September 2019 showed that the HKSAR government made efforts to engage with EU stakeholders directly using its paradiplomatic channels in Brussels.⁸² The London HKETO organized a visit for the HKSAR Secretary for Financial Services and the Treasury to visit Stockholm and Tallinn in September 2019 to emphasize the Hong Kong government's stance on the anti-extradition protests.⁸³

2020 HONG KONG NATIONAL SECURITY LAW

The landscape started to change three weeks after the head of China's Liaison Office in Hong Kong called for a national security law. The three HKETOs' discourse on Hong Kong's high degree of autonomy under Chinese control underwent a dramatic change of course after the "Chinese Central Government" was mentioned for the first time in a clarification letter issued by the Brussels HKETO on May 9, 2020. From that date to March 25, 2021, the Europe-based HKETOs issued 44 letters targeting media outlets from 10 EU countries, including EU Observer, a pan-European media outlet.

For matters related to the NSL, the HKETOs mainly targeted French, Dutch and German-speaking audiences. Since the need for national security legislation was brought up among the Chinese political elites in Hong Kong in early 2020, the centrality of Hong Kong's autonomy has shifted from the SAR's established institutions to the political will of the Chinese sovereign. In contrast to the stated functions of the HKETOs, their analyzed statements defended China's interests in pursuing its national security in the SAR instead of promoting Hong Kong as a free space with its autonomous system free from direct Chinese political interference.

The definition of Hong Kong's autonomy, as the HKETOs understood it during the said period, changed drastically from that of the status of a separate entity with competence to engage with international organizations to a peripheral matter where China's national security presides over Hong Kong's economic and trade interests with other countries. The presupposed strength of Hong Kong, an international city host-

ing 127 foreign official representations approved by the Chinese authorities, became a national security threat. The HKETOs started prioritizing Chinese national security instead of maintaining positive relations with foreign representations in Hong Kong as a dominant part of newly defined Hong Kong interests. Largely shaped by the importance of Chinese territorial integrity, the HKETOs helped Chinese authorities to amplify the message of PRC national sovereignty over Hong Kong's autonomy granted by international treaties and the Chinese constitution. Similar statements on the primacy of PRC's sovereignty over the HKSAR were repeated 14 times in the HKETOs' clarification letters published between May and June in 2020 in French, Dutch, German and Italian as shown in the following quote: "Every country has the right and, indeed, the duty to protect national security and sovereignty. As a result, China, which exercises sovereignty over Hong Kong, has the right to protect national security in the Hong Kong Special Administrative Region (HKSAR)."

The Chinese authorities replaced the HKSAR government as the center of Hong Kong's autonomy, according to the HKETOs. Interpreting the powers and responsibilities of the Chinese Liaison Office in Hong Kong, as the top Chinese government representation, is not part of the HKETOs' tasks. The discourse on Hong Kong's autonomy, however, has turned to the legitimacy of Chinese governmental organizations, including the Liaison Office, National People's Congress (NPC) and the Standing Committee of the Congress (NPCSC). The narrative that "Hong Kong is an inseparable part of China", as written in the Hong Kong Basic Law, was manipulated to justify the NSL to overwrite a number of provisions of the Basic Law by exercising China's sovereignty over Hong Kong. Since the implementation of the NSL, the existence of Hong Kong's autonomy started to depend on the PRC regime's 'determination' and 'confidence', as the HKETOs' statements stressed.

In regard to the banned vigil to commemorate the 1989 Tiananmen Square Massacre in Victoria Park and the disqualifications of four Hong Kong Legislative Council (LegCo) Members, the role of the HKSAR Government were marginalized in the HKETOs' discourse. While the statements cited the "purely public health reasons" for banning the vigil, China's own national security became the top agenda of the HKETOs as they explained the specifics of the NSL and how it will protect China's national interests in terms of protecting its sovereignty in the HKSAR. The disqualification of four LegCo Members was justified by the Chinese national legislature NPCSC instead of by the internal procedures of Hong Kong's Legislative Council, and the HKETOs' statements highlighted that the HKSAR government was not competent to decide whether those LegCo members were qualified to retain their seats in the de-facto Hong Kong parliament. In this way, Hong Kong's autonomy was reduced to shadowing the Chinese state instead of acting on its own where it is competent.

2021 ELECTORAL SYSTEM OVERHAUL

Less than a year after implementing the HKNSL, the Chinese NPC's direct authority over Hong Kong's autonomous system was further consolidated. Between March 25, 2021, the first time when a HKETO clarification letter⁸⁴ mentioned electoral system overhaul, and January 13, 2022, the final HKETO clarification letter⁸⁵ on Hong

Kong's political development, the HKETOs issued 45 clarification letters targeting 11 EU countries. These touched upon a range of topics such as the electoral reforms themselves, NSL, changes in immigration regulation, media freedom, and the ban of the 1989 Tiananmen Square Massacre Vigil.

The HKETOs defended the Chinese-imposed controversial electoral reform in Hong Kong, which effectively made it impossible for pro-democratic candidates to gain a majority in the LegCo. To justify the fact that the NPC bypassed the LegCo to impose this reform, the HKETOs claimed that it was a reform implemented to stabilize the city in order to ensure China's national security. In this regard, not only have the PRC interests overridden Hong Kong's economic and financial interests in engaging with foreign entities as a separate entity, but the Chinese legislature has also exerted direct control over Hong Kong's legislature. Four similar statements were published between March and April in 2021 in French, Spanish and Slovak as shown below: "The decision is constitutionally and legally sound. The National People's Congress is the highest state power organ in China, and the electoral system of the HKSAR forms a significant part of the constitutional order that falls within the jurisdiction of the central authorities."

The HKETOs' discourse of Hong Kong's interests has thus turned into defending the PRC's state organs in imposing power and exercising full sovereignty over the HKSAR. With the legislation of the PRC's political agenda in the HKSAR, the overseas HKETOs have been transformed into an extension of Chinese state power.

Media freedom in Hong Kong was also a factor challenging China's national security interests, according to the HKETOs' statements. In response to the raids of media outlets, their closure and subsequent arrests made by the Hong Kong Police Force, the HKETOs defended the actions of the PRC-established National Security Office by claiming that there were acts of collusion with foreign entities committed by the implicated media workers and their superiors. Given the ratification of international treaties on human rights in Hong Kong, the arrests were contradictory to Hong Kong's interests. The HKETOs' emphasis on national security appeared to be consistent with Chinese-imposed law instead of domestic legislation.

Reinforcing Chinese economic security as one of the five areas of the Chinese national security concept in Hong Kong, the HKETOs in Brussels and Berlin organized numerous activities⁸⁶ from November 2022 to October 2023 to highlight Chinese strategic objectives in promoting the GBA and the BRI. To emphasize these strategic objectives, the Brussels ETO collaborated with the Hong Kong Financial Services Department and other commercial organizations to organize over 70 seminars, talks, receptions, luncheons, dinners and other events in 10 EU countries covered by the office; the Berlin ETO organized a business luncheon in Warsaw in November 2022 and co-organized a networking event entitled "Innovation hub Hong Kong—Chances for German startups" in May 2023 in order to promote GBA and BRI development. The London ETO mostly focused on liaising with the British government, trade organizations, commercial and industrial organizations to promote development related to the GBA and BRI. The HKETOs also helped the Hong Kong Deputy Secretary for Justice to arrange visits⁸⁷ to Italy, the Netherlands and Switzerland in 2023 to reinforce the HKSAR government's position on the legal situation in Hong Kong.

Conclusion

The above analysis has demonstrated how the Hong Kong government changed its understanding of the city's high degree of autonomy from the 2019 anti-extradition protests to the implementation of the HKNSL and eventually the 2021 electoral system overhaul. According to the 128 HKETO clarifications analyzed, the Hong Kong regime's discursive construction on the boundaries between Hong Kong's interests and the PRC's interests has shifted. The change from defending Hong Kong's autonomy in conducting external relations with the EU and EU countries to legitimizing PRC governmental organizations and the imposition of PRC national security interests has contributed to a new definition of Hong Kong's interests.

The three analyzed HKETOs' increasingly political discourse on major developments in Hong Kong have manifested the effective loss of their non-political nature in representing the HKSAR government's trading and commercial interests abroad. The newly defined Hong Kong interests show that overseas HKETOs now function as paradiplomatic organs to advance the PRC's strategic objectives in promoting the GBA and the BRI which in turn further weaken Hong Kong's autonomy. Through the HKETOs, HKTDC offices and Hong Kong-affiliated European business groups, the HKSAR government aims to cultivate a new business environment in compliance with the requirements set by the HKNSL.

At the time of writing, the British police have arrested three British citizens⁸⁸ who allegedly breached the British National Security Act 2023 for assisting the Hong Kong intelligence services. One of the suspects is an office manager of the London HKETO, who was accused of hiring British border guards to monitor the activities of London-based Hong Kong activists wanted by the national security police in Hong Kong.⁸⁹ If the HKETO manager is found guilty, it would be the first proven case of overseas surveillance by the Hong Kong intelligence services through HKETOs.

Considering these developments, and the role of HKETOs in aiding the extra-territorial provisions of the HKNSL which interfere with the European democratic system, the status of the HKETOs should be reevaluated. The special status of Brussels HKETO's head as "Special Representative for Hong Kong Trade and Economic Affairs to the European Union" is no longer applicable to the Office and it needs to be unilaterally revoked by competent authorities. Moreover, the Hong Kong government representatives should be effectively treated as representatives of PRC interests and part of the PRC government's delegation instead.

The change of approach would best be raised by individual EU countries prioritized by the Brussels HKETO. As shown by the data collected in this research, media outlets in France, Germany and the Netherlands were the top priorities for the Brussels HKETO to issue clarifications on Hong Kong's development. In this view, an informal trilateral working group can facilitate new EU-wide conclusions on Hong Kong which would call for the suspension of bilateral meetings between the Offices' representatives and EU countries' representatives until the national security

law is repealed, and a review of all existing bilateral treaties between the Hong Kong Government and EU countries. The EU countries' national and municipal officials should also refrain from engaging in bilateral dialogues with the concerned HKETOs' representatives and so legitimizing the offices.

The now PRC-controlled HKSAR government has limited capacity to function as an autonomous executive branch free from the influence of the Hong Kong-based Chinese government organizations. Should legal disputes arise between Hong Kong-based EU business entities and Hong Kong business entities affiliated with the HKSAR government or the PRC, it remains questionable whether the Hong Kong courts can function independently from the PRC political influence instrumentalized by the HKNSL. Since there is no legal certainty⁹⁰ in post-HKNSL Hong Kong jurisdiction, the HKSAR's conclusion of Investment Promotion and Protection Agreements (IPPAs) with 10 EU countries and Comprehensive Double Taxation Agreements (CDTAs) with 16 EU countries need to be either reviewed or suspended until the HKNSL has been completely repealed.

Hong Kong's paradiplomatic status has always been a constant struggle between the PRC's desire to exercise its full sovereignty over the SAR and Hong Kong's largely independent judiciary with the power of final adjudication, which arguably fended off, to some extent, full Chinese control over the de-facto city-state even during the 2019 anti-extradition protests. However, as the National Security Law has been institutionalized in the HKSAR's commercial and trade policies through the PRC-led GBA and BRI, the decision-making processes of the relevant Hong Kong departments have been overridden by PRC interests.

This research has illustrated the purposes, functions and discourse of the HKETOs in Brussels, Berlin and London, but it is far from a conclusive contribution to an understanding of Hong Kong's paradiplomacy in the EU as the HKETOs only represent a part of the city's overseas activities. More substantial research is needed to articulate more fully how the ties between Hong Kong and the EU are taken advantage of by the PRC to promote its own interests.

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Footnotes

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