

China and Chineseness: Lessons from the Chinese Mainland, Hong Kong and Taiwan Professor Steve Tsang, Director, SOAS China Institute 15 October 2025

Who is a Chinese should be a simple question to answer. It is not. On who is a Chinese, China's nationality law is clear. Anyone born in China to at least one Chinese parent is a Chinese national, and if one then acquires a foreign nationality by settlement, one loses Chinese nationality and citizenship automatically. There is no requirement for one to renounce it or to apply to lose it. But according to China's supreme leader, Xi Jinping, if one has Chinese blood running through one's veins, one is Chinese, and should strive to become a Chinese patriot. It is also not entirely clear what Chinese blood means by Xi. Is, say, Uyghur or Tibetan or Korean or other minority blood as Chinese as the blood of the majority Han people? At what percentage will a person of mixed parentage lose the right to claim Chineseness? There is a circle here that needs to be squared though not from Beijing's perspective.

The Chinese state has a monopoly in defining Chineseness, as it does on practically anything it deems to be of national importance. It does not allow any Chinese citizen or, for that matter, foreigner to quote any Chinese law to contradict its supreme leader. Thus, within China itself, Chineseness is whatever China's top leader or leaders say it is, and it can change. Challenging it is deemed at the very least unpatriotic. Under Xi Jinping, the same can apply beyond China's borders to anyone with an unspecified percentage of Chinese parentage.

What about the sense of identity of people from Hong Kong, Taiwan and the Chinese diaspora. Are they Chinese or are they not? Do they have agency in deciding their own identity? Are they allowed to identify with cultural or civilizational China but not with the contemporary Chinese state, the People's Republic of China, which follows the leadership of the Chinese Communist Party and its core leader absolutely? The answer is 'yes' under Chinese Law but 'no' while China is under the leadership of Xi Jinping. With China being a Leninist party-state, the Communist Party and its supreme leader always lead the government or the state. Chinese law cannot override the will of the Party or its supreme leader.

The identity of people in Hong Kong and, in particular, Taiwan is contested. While most people in Hong Kong either identity themselves as Hongkongers or Chinese Hongkongers or Hong Kong Chinese, thus holding a distinct identity or a dual sense of belonging to both Hong Kong and China, they are, since 1997, legally nationals of the People's Republic of China. To the Chinese state, this prevails over the nationality, such as British National Overseas status that some Hongkongers have acquired as a result of British colonial rule in Hong Kong. On this basis, it rejects Hongkongers with British National Overseas having status as British nationals with a right to come, live and work in the UK, and a pathway to full UK citizenship.

The situation of the people of Taiwan is even more complex. Even though the Chinese state claims Taiwan as a sacred territory from ancient time, four historical facts need to be confronted. First, Taiwan has never been part of the People's Republic of China. Second, the Chinese Communist Party was until the end of 1943 the strongest advocate that Taiwan should be granted independence from Japan once Japan was defeated in the Second World War. Third, even the predecessor of the People's Republic, the Republic of China (1911-49) did not exercise sovereignty over Taiwan before the early 1950s. When it administered Taiwan between 1945 and 1952, after the Second World War, it did so as the occupying power, under the authority of General Order No. 1 of the Supreme Commander of the Allied Powers, US



general Douglas MacArthur. Until the San Francisco peace treaty was signed in 1951, when Japan renounced its sovereignty over Taiwan, it remained a part of the Japanese Empire albeit under Allied occupation. The Republic of China arguably secured sovereignty of Taiwan from Japan when they signed a peace treaty (The Treaty of Taipei) in 1952, which reaffirmed the terms of the San Francisco Treaty. (The Republic of China could not join the San Francisco peace conference, as the UK had recognized the People's Republic in 1950 and thus did not accept the Republic of China could represent China.) Fourth, the Qing Dynasty that invaded and incorporated the island of Taiwan into its empire in 1684 was a Manchu. not Han, empire, in an era when China was itself conquered by the Manchus. It is debatable if Taiwan before 1911 was a part of China or a part of the Manchu Empire, with both Taiwan and China proper being Manchu colonies. (Manchu people were not considered a minority in China until the Republic of China was founded in 1912.) The overwhelming majority of people in democratic Taiwan does not accept that Taiwan is a part of the People's Republic of China, and Taiwan's official name remains the Republic of China or the Republic of China on Taiwan. Does this make its citizens nationals of the People's Republic or of a separate political entity, the Republic of China? If they are deemed Chinese, would this make them a special category of 'Chinese', one distinct from the Chineseness defined by Beijing? Should people of Taiwan have a right to decide who they are?

Ethnic Chinese in the global Chinese diaspora is even more complex in their identity. The overwhelming majority of them are simply citizens and nationals of their countries of birth or adoption, who have Chinese ancestry. Among recent emigrants from the People's Republic some still identify themselves as Chinese in the sense Beijing defines it. Some do not, and have embraced the nationality of their adopted countries. As to emigrants from Taiwan and Hong Kong they overwhelmingly do not. And then there are descendants of earlier Chinese emigrants predating the founding of the People's Republic in 1949. And people of mixed parentage with, to use the Xi language, some Chinese blood running in their veins. There is a wide spectrum of views among them in terms of how Chinese they are, and what being 'Chinese' means.

Is Chineseness historically well entrenched? Was the last imperial dynasty, the Qing (1644-1911), as Chinese as its predecessor, the Ming (1368-1644)? The Qing was strictly speaking an empire of the Manchu people who conquered, among others, the Ming, which was the last imperial dynasty of the ethnic Han people. Is such a distinction even meaningful, since the modern Chinese identity did not get created until after China became a republic in 1912? Should Chineseness be benchmarked against bloodline or sense of identity based on people's feeling and choice?

Ultimately, who should decide what being Chinese means. Is it right that the state should have a monopoly over this? Should people constituting the nation have a right to decide too?

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Further Reading

Chun, Allen, "Fuck Chineseness: On the Ambiguities of Ethnicity as Culture as Identity", *Boundary 2*, vol.23, no.2 (Summer, 1996), 111-138.

Faure, David, "Reflections on Being Chinese in Hong Kong", in Brown, Judith M, and Foot, Rosemary (eds), *Hong Kong's Transition*, 1842-1997 (London: Palgrave Macmillan, 1997), 108-120.

Harrison, Henrietta, The Making of the Republican Citizen (Oxford: Clarendon Press, 2000)

Louie, Adnrea, *Renegotiating Chinese Identities in China and the United States* (Durham & London: Duke University Press, 2004)

Nationality Law of the People's Republic of China (1980), http://www.npc.gov.cn/zgrdw/englishnpc/Law/2007-12/13/content 1384056.htm

Sier, W., & Barabantseva, E., "Descendants of the dragon: racialized mixed Chineseness in immigrant China", Ethnic and Racial Studies (2024), 1–19. https://doi.org/10.1080/01419870.2024.2397548

Tsang, Steve & Cheung, Olivia, "Creating a Patriotic People: Party-centric nationalism", in Tsang, Steve & Cheung, Olivia, *The Political Thought of Xi Jinping* (New York: Oxford University Press, 2024), 145-167.

Wang, Gungwu, China and the Chinese Overseas, (Singapore: Times Academic Press, 1991)