

# A Review of Current Research in Mainland Academia on the "One Country, Two Systems" Formula for Taiwan

当前大陆学界“一国两制”台湾方案相关研究述评

## SOURCE

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## I. Introduction

On January 2, 2019, at an event commemorating the 40th anniversary of issuing the *Message to Taiwan Compatriots*, General Secretary Xi Jinping for the first time specifically discussed exploring the “two systems” Taiwan formula and enriching the practice of peaceful reunification, revealing the great practical significance of exploring the “one country, two systems” Taiwan formula in the new era, and directly propelling the theoretical exploration of the “one country, two systems” Taiwan formula to a new stage. Guided by this, academic research on the “one country, two systems” (1C2S) Taiwan formula must adapt to the new situation to achieve a transition from research on the 1C2S Taiwan model to exploration of the 1C2S Taiwan formula. There is also an urgent need to expand the breadth and depth of research content, so as to provide adequate intellectual support for the design and implementation of the “two systems” Taiwan formula. Before deepening the academic research on the 1C2S Taiwan formula and exploring the formula’s specific design, it is necessary to conduct a systematic review and analysis of the existing academic research on the 1C2S Taiwan formula, to get a clear picture of the progress, characteristics, and shortcomings of related research in the process of going from studying the 1C2S model for solving the Taiwan issue to exploring the “two systems” Taiwan formula.

## II. Overview of the Content of Current Research in Mainland China on the “One Country, Two Systems” Taiwan Formula

Since the idea of “one country, two systems” was first proposed in the early 1980s, mainland scholars have begun to research and explore the 1C2S principle for solving the Taiwan issue, and have made many achievements in the exploration of the 1C2S Taiwan model. Overall, the focus has mainly been on the following five topics.

### i. On the ideological origins of the “one country, two systems” Taiwan formula

“One country, two systems” was originally proposed in order to peacefully resolve the Taiwan issue. When Deng Xiaoping first proposed the 1C2S concept, its content was more tailored to the Taiwan issue. That is to say, the initial concept of “one country, two systems” established the basic ideological framework of the 1C2S Taiwan formula. In consequence, to examine the ideological origins of the 1C2S Taiwan formula is actually to delve into the ideological origins of “one country, two systems.” On the whole, current academic exploration of the ideological origins of the 1C2S Taiwan formula is comprised mainly of three types.

**1. The “one country, two systems” Taiwan formula originated in the thinking of first-generation leaders such as Mao Zedong and Zhou Enlai on the peaceful liberation of Taiwan.** Although 1C2S was a creative idea first proposed by comrade Deng Xiaoping, many scholars maintain that the relevant thinking on Taiwan of leaders like Mao Zedong and Zhou Enlai was an important inspiration for Deng Xiaoping’s proposal of 1C2S. Li Jiaquan, after conducting a comparative analysis of the strategic thinking of three generations of CCP leaders on unifying China, points out that Deng Xiaoping, “as the Party’s General Secretary at that time, was also a direct participant in and formulator of the peaceful reunification idea of the ‘four principles [on Taiwan]’.” His proposal of the general principle of “peaceful reunification and one country, two systems” after the Third Plenum of the Eleventh Central Committee, was an inheritance and development of the idea of peaceful reunification proposed by first-generation leaders Mao Zedong and Zhou Enlai.<sup>1</sup> Xie Chuntao believes that although Mao’s idea of the peaceful liberation of Taiwan was somewhat incomplete and could not be very effective under the historical conditions at that time, it provided a useful reference for Deng Xiaoping’s proposal of the “one country, two systems” concept following the Third Plenum of the Eleventh Central Committee.<sup>2</sup>

**2. The “one country, two systems” Taiwan formula is rooted in deep traditional Chinese history and culture.** Some scholars believe that 1C2S, as a kind of theoretical concept with Chinese characteristics, necessarily has its own special basis in Chinese history and culture. On this point, Fei Xiaotong has remarked that 1C2S does not only have political significance. “When you go a step further to look at its origins, there is a Chinese cultural essence in it. It can combine different things together. Without this kind of an essence, we would not have today’s Chinese nation or Chinese culture, and 1C2S would not have emerged.”<sup>3</sup> According to Li Daoxiang’s analysis, in terms of theoretical model, the theory of 1C2S is closely related to the traditional Chinese cosmological model of “one divides into two”; in terms of thought, it contains traditional Chinese culture’s spirit of

pursuing unity, longing for peace, and seeking harmony without sameness; and in terms of values, it embodies the core values of the Chinese nation.<sup>4</sup> Kong Xiangwen argued that 1C2S not only embodies the contemporary value of a political culture that is traditionally one of “pluralistic unity” in nature, but also embodies the spirit of Chinese harmonious culture and people-oriented thought.<sup>5</sup> In addition, there are scholars who have taken pains to sort through and analyze the implementation of the official system in the north and south of the Liao Dynasty, the earliest 1C2S-like situation in Chinese history.<sup>6</sup>

**3. Lenin’s thinking on “peaceful coexistence” provided important theoretical inspiration for “one country, two systems.”** Starting from Lenin’s thinking on the long-term peaceful coexistence of countries with two different systems, capitalism and socialism, some scholars believe that 1C2S is a flexible application and development of “peaceful coexistence.” Zhou Chunyuan has explicitly argued that the direct source of thought of 1C2S is Lenin’s idea of peaceful coexistence, which Deng Xiaoping applied specifically to issues of domestic relations in the process of peaceful reunification, based on the development realities of Hong Kong, Macau and Taiwan.<sup>7</sup> Wang Zhongren has also argued that Deng Xiaoping broke beyond Lenin’s traditional way of thinking, which used the idea of “peaceful coexistence” to deal with interstate relations, and applied it skillfully to deal with China’s internal issue of unification. Thus the great concept of “one country, two systems” was created.<sup>8</sup>

In addition to the above three types, there have also been a small proportion of scholars who have variously examined the origins of the 1C2S concept from a scattering of perspectives, such as the “Tibet model” in the early years after the PRC’s establishment, and the coexistence of different systems in world history.

#### **ii. On the basic content of the “one country, two systems” Taiwan formula**

As one of the core components of “one country, two systems,” the 1C2S Taiwan formula contains two layers of meaning: the first is the general connotation, which is the basic connotation of 1C2S. Based on Deng Xiaoping’s original concept, the general consensus in academia regarding the basic connotation of 1C2S is that “within the unified People’s Republic of China, Hong Kong, Macau and Taiwan are permitted to practice capitalist systems, on the premise that the main body of the country practices a socialist system.”<sup>9</sup> Put succinctly, it is “one country, two systems, a high degree of autonomy, and peaceful reunification.” The second is the particular connotation. In view of the particularity and complexity of the Taiwan issue, in addition to the general connotation of “one country, two systems,” the 1C2S Taiwan formula also has a special connotation different from “one country, two systems” as implemented in Hong Kong and Macau. Scholars have examined the particular connotations of the Taiwan formula mainly from three aspects: the basic principles or requirements, the path arrangements prior to reunification, and the institutional forms after reunification.

**1. Basic principles or requirements.** In contrast to the Hong Kong and Macau issue, the Taiwan issue is not only a remnant of China’s civil war. There are also external factors such as the United States involved, and its solution is clearly more complex and longer-term in nature. Consequently,

using the “one country, two systems” approach to solve the Taiwan issue not only depends on the interaction between Taiwan’s internal political ecology and cross-strait relations, but is also to a great degree subject to the interference of external forces such as the United States and Japan, and its involvement in China’s internal affairs and diplomatic relations is also more complex. As a result, when some mainland scholars discuss the 1C2S Taiwan formula, they often pay special attention to first defining clear basic principles or requirements, in order to regulate the design of the political arrangements for the “two systems” Taiwan formula and ensure that its overall direction is stable and far-reaching, and then go on to propose a sensible and reasonable formula.

Li Jiaquan pointed out early on that the “one country, two systems” Taiwan model<sup>10</sup> must put forward four conditions, including principles (the one-China principle), peace (no U.S. intervention, no “independence” for Taiwan, then no use of force by the mainland), democracy (extensive solicitation of the Taiwanese people’s reasonable and feasible opinions), and equality (equal consultation and negotiation between representatives of the two sides).<sup>11</sup> Li Yihu has argued that there are several requirements that the political design of the “one country, two systems” Taiwan model must pay attention to, mainly along the lines of conformity with “peaceful reunification and common development,” adherence to the one-China principle, and adjustment of the constitutional structure.<sup>12</sup> Yu Keli examined the basic principles and main content of the “one country, two systems” Taiwan model from three aspects: the one-China principle, the long-term coexistence of “two systems” with a high degree of autonomy, and political negotiation.<sup>13</sup> Zhang Nianchi and Sun Dayao and colleagues put special emphasis on the basic principle of joint cross-strait participation in negotiations. The 1C2S Taiwan formula is not imposed by one side on the other, but is the result of joint negotiations between the two sides of the Taiwan Strait.”<sup>14</sup> Without the Taiwanese people’s participation and struggle, even if “one country, two systems” were to be equivalent to “confederation” or “federation,” it would be difficult to fundamentally eliminate their mentality of fear and resistance. “Discussing reunification together and establishing one China together” is the inevitable path and mode for cross-strait reunification.<sup>15</sup>

**2. Path arrangements prior to reunification.** Compared with Hong Kong and Macau, the most significant difference of the Taiwan issue lies in the fact that Taiwan has not yet achieved reunification with the motherland. Hence, in addition to designing a reasonable post-reunification institutional form, the 1C2S Taiwan formula must also include path arrangements that fit the pre-reunification development of cross-strait relations, i.e., path arrangements that regulate the state of cross-strait relations before reunification and promote the realization of cross-strait reunification. Many scholars have also carried out in-depth examinations of precisely this issue. Huang Jiashu believes that, under the status quo of “one China, and the two sides of the Strait not yet reunified,” the most important thing in the development of “one country, two systems” is to recognize that both sides of the Taiwan Strait belong to the same country, while temporarily shelving or blurring the “two-government dispute” within “one country.” He further proposed the idea of “three steps,” the first step being to negotiate and reach an agreement, under the one-China principle, to end the current hostile state. The second and third steps are for both sides to negotiate on an equal footing, plan together, and discuss reunification to resolve the issue of “integrating the two governments into

one government.”<sup>16</sup> Li Yihu has mapped out a dynamic path for the 1C2S formula for Taiwan prior to reunification that includes three stages. It goes from the peaceful development stage to the political negotiation stage, then from political negotiation to a transitional stage prior to reunification. Finally, autonomous reunification would be achieved on the basis of it being entered into voluntarily on both sides of the Taiwan Strait.<sup>17</sup> Starting from the theoretical construction of the “one country, two systems” Taiwan model, Lin Gang also analyzes that “on the premise that the Taiwan authorities agree to the one-China framework or structure, using the ‘two governments, two systems’ model as a reasonable arrangement for cross-strait political relations before reunification...is in line with the fundamental interests of the people on both sides of the Taiwan Strait.”<sup>18</sup>

**3. Post-reunification institutional arrangements.** The issue of post-unification institutional forms is part of the core content of the 1C2S Taiwan formula. It is concerned with what kind of political arrangements—including power allocation, relationship positioning, and institutional structure, etc.—should be put into practice in cross-strait relations after the realization of reunification, under the framework of the basic principles of “one China, two-system coexistence, a high degree of autonomy, and peaceful reunification,” in order to ensure win-win post-reunification development. Solving the Taiwan issue is not about simply pursuing the goal of reunification; ultimately it must rest on the common realization of the “Chinese dream” on both sides of the Taiwan Strait, and the common achievement of the historical mission of the great rejuvenation of the nation. Based on this level of significance, whether, post-reunification, a system can be proposed that is satisfactory and acceptable to the people on both sides of the Taiwan Strait and that can promote both sides’ common development has become a top priority in research on the 1C2S Taiwan formula, and thus many scholars have made useful explorations on the topic.

Li Jiaquan suggested that, in order to maintain Taiwan’s “governmental structure” without violating the one China principle, the “large administrative region” structure that was implemented in the 1950s on the mainland can be applied to Taiwan’s institutional structure after reunification, with powers secondary to those of the central government but superior to those of the provinces and municipalities under its jurisdiction.<sup>19</sup> Wang Liping has argued that the two systems in “one country, two systems” can also refer to a unitary system and a federal system, and that the post-unification system can also be a composite of a unitary system and a federal system. “As long as there are realistic and theoretical possibilities, ‘one country, two systems’ and the one China principle do not exclude using a federal system to achieve national unification.” Also, “if the unitary state absorbs some features of the federal system state in order to achieve national sovereignty and territorial integrity, even though it blurs the boundaries between the two forms of state structure, its value is that it is conducive to realizing the integrity of national unity and sovereignty.”<sup>20</sup> Drawing on certain “federal system” experiences, Wang Yingjin proposed a new conception of the 1C2S Taiwan model, its distinct feature being that it thinks through arranging for post-reunification Taiwan to enjoy the exercise of partial sovereignty (which does not imply recognition that Taiwan has “sovereignty”) or decentralized autonomy. In other words, “through cross-strait negotiations, the Taiwanese side will return to the Central People’s Government those parts of the exercise of sovereignty that can reflect national unification (e.g., diplomatic power), and the remainder that have not been returned will be

retained by the Taiwanese side as ‘residual powers.’<sup>21</sup> It follows that the relationship between mainland China and the region of Taiwan would no longer be a relationship between central government and local government in the general sense, but a relationship between the central government and a “quasi-central government.”<sup>22</sup> Li Yihu argues that the construction of a constitutional republic, meeting Taiwan’s demand for protection of interests in terms of the source and distribution of power, could effectively solve the problem of post-reunification power distribution, reshape national identity, and thereby strengthen the acceptance and recognition of 1C2S by the people of Taiwan.<sup>23</sup>

In addition, some scholars have also examined and analyzed the operational logic of the “German model,” the “Tanzanian model,” and inter-Korean relations, and so on, exploring their implications for the 1C2S Taiwan formula. These have all provided valuable contributions to the exploration of the institutional arrangements for the 1C2S Taiwan formula.

### **iii. Theoretical basis and significance of the “one country, two systems” Taiwan formula**

The connotations of the 1C2S Taiwan formula not only have rich origins in terms of thought, but also a deep theoretical basis, and reflect the innovation and development of related theories. Overall, existing research outputs have examined the theoretical capacity of the 1C2S Taiwan formula from four theoretical perspectives: Marxist philosophy, sovereignty and administrative power, state structural form, and constitutional jurisprudence. Since the 1C2S Taiwan formula is included in the 1C2S framework, scholars have mostly explored the theoretical basis and significance of “one country, two systems” as a whole.

**1. Marxist philosophy.** From the perspective of Marxist philosophy, scholars have analyzed the classical ideas of materialist dialectics, seeking truth from facts, and the unity of the “two-point theory” and the “key point theory” as the philosophical basis of 1C2S. On the other hand, they have also examined the important theoretical contributions of 1C2S to Marxist philosophy. Mei Rongzheng believes that the 1C2S concept fully implements the “objectivity of observation” principle of Marxist dialectical materialism and historical materialism, that is, starting from reality and seeking truth from facts. Deng Xiaoping’s “one country, two systems” concept “did not start from individual theoretical branches or examples. Instead, starting from a comprehensive analysis of history and reality, the times and national conditions, its political design was developed by grasping the most essential, most wholly applicable ‘realities’.”<sup>24</sup> Pan Shuming focuses on the 1C2S formula’s creative application of the essence of dialectical materialism and historical materialism, namely, seeking truth from facts.<sup>25</sup> Yu Keli focuses on analyzing 1C2S as a model for the creative application of Marxist materialistic dialectics in three respects: fully embodying the dialectical law of the unity of opposites, developing the theory on the correct handling of contradictions among the people, and penetrating the “two-point theory” of dialectics.<sup>26</sup>

**2. State structural form.** A relatively large number of scholars have set out from the Marxist theory of the state or the theory of state structural form in constitutional theory to explore the theoretical implications of the adjustment of state structural form which the 1C2S Taiwan formula reflects. They

have highlighted that the implementation of 1C2S is a breakthrough and innovation of the traditional concept of the unitary form of state structure.

Liu Haifan has pointed out that 1C2S is a creative development of the Marxist theory of the state. It implies relying on the state power with the proletariat occupying the ruling position to establish, on the whole, a strong, independent, democratic, and civilized state system at the primary stage of socialism, and at the same time unifying two regions with different social systems and different ideologies within one state.<sup>27</sup> Liu Huanming and Zhang Bin also hold that the “composite-unitary” state model represented by “one country, two systems” is an innovation of Marx’s theory of state structural form. The 1C2S Taiwan model, as a new form of state structure that has yet to be settled, will not be a simple unitary system, let alone a typical federal system, but will be a unique form of state structure with Chinese characteristics, one between the unitary system and the federal system, for dealing with national issues and overall and local interests.<sup>28</sup> Wang Weixing has proposed that 1C2S is a new model of state structure that focuses on a unitary state structure while partially incorporating the beneficial elements of a composite system, which is a creation and breakthrough of state structure theory.<sup>29</sup> Based on his exploration into the connotations of state structural form theory, Wang Yingjin specifically discusses the issue of how to judge whether a certain form of state structure has the characteristics of federalism, and argues that the practice of “one country, two systems” in Hong Kong and Macau does not have federal characteristics, while his conceptualization of the 1C2S Taiwan model actually is a “true unitary system with federal characteristics.”<sup>30</sup>

**3. Sovereignty and “administrative power.”** Further extending and refining state structural form theory, some scholars also start from the perspective of sovereign power theory to focus on the key issue of how sovereignty and administrative power are distributed under the 1C2S Taiwan formula. The focus is on the 1C2S concept as an embodiment and innovation of the theory of sovereignty and administrative power. Wang Bangzuo and Wang Huning argue that 1C2S is a highly organic combination of sovereignty and administrative power: “One country” refers to the indivisibility of national sovereignty and the unity of the Chinese nation; “two systems” emphasizes a high degree of autonomy.<sup>31</sup> Huang Jiashu and Wang Yingjin propose a research framework on sovereignty composition, that is, 1C2S deals with the relationship between the ownership of sovereignty and the right to exercise sovereignty, changing the “passive separation” of the two into “active separation.” In “one country, two systems,” “one country” is the core and the goal, reflecting the uniqueness and indivisibility of sovereignty ownership; “two systems” is the means, the form for realizing national unification and sovereign integrity, reflecting the divisibility and transferability of the right to exercise sovereignty.<sup>32</sup> Li Yihu emphasizes that China’s sovereignty is not currently divided, and that the pursuit of reunification through 1C2S is only at the level of the administrative power. Its point of departure is to pursue unification of the (actual) jurisdiction and management of public affairs. That is, it is intended to prevent the continuation of the abnormal state of separation of sovereignty from administrative power without the consent of all the people, and the danger of real division of sovereignty, and to find a model of national reunification acceptable to both sides of the Taiwan Strait that will facilitate comprehensive cross-strait reunification.<sup>33</sup> Yuan Zhengqing and Zhao Yang, starting from the perspective of sovereignty norms in international relations, point out that Deng

Xiaoping's vision and practice of "one country, two systems" is a Chinese innovation of sovereignty norms: first, it allows different types of political systems to co-exist and develop under the framework of one sovereign state; and second, the relationship between the two political systems is not parallel but subordinate.<sup>34</sup>

**4. Constitutional jurisprudence** Some scholars have also specially explored the constitutional and legal implications behind "one country, two systems" from a jurisprudence perspective. Firstly, scholars have considered the important value of "one country, two systems" from a constitutional perspective. In Li Yihu's analysis, the construction of the 1C2S Taiwan formula is part of the regulation and allocation of vertical state power operation in the process of constructing China's constitutional system and institutions. By constructing and improving the constitutional system it safeguards the rights and interests of citizens, dispelling the Taiwanese people's doubts that their rights and interests cannot be guaranteed, strengthening the Taiwanese people's identification with the state, promoting the realization of national reunification, and safeguarding the overall interests of the people of China as a whole, including Taiwanese people.<sup>35</sup> Wang Zhenmin suggests that the continuous deepening and innovation of the practice of "one country, two systems" will inevitably enrich and improve China's constitutional theory and system, thereby creating a higher level of constitutional civilization.<sup>36</sup> Secondly, some scholars have analyzed the legal basis of "one country, two systems" and its innovation value from a legal integration angle. Rao Geping points out in his analysis that the civil law system characterized by statutory law and the common law system characterized by common law are not diametrically opposed and exclusive. Instead, they constantly enrich themselves by absorbing and transplanting each other's advantages. Therefore, after 1C2S reunification, the various legal systems of mainland China, Hong Kong, Macau and Taiwan can learn from, draw from, and promote each other, maintaining the prosperity and stability of each, and this can enrich and develop the legal culture of the whole nation.<sup>37</sup> Chen Youqing has noted that 1C2S embodies the international law idea of the principle of peaceful coexistence. The theory of 1C2S introduces for the first time in the field of domestic law the international law concept of "peaceful coexistence, long-term coexistence, and common development" between two completely different and even long-standing opposing systems, thus expanding application of the peaceful coexistence principle to a completely new area.<sup>38</sup>

In addition, there are also scholars who have focused mainly on the challenges that 1C2S presents to China's constitutional government and legal theory, offering their own responses and reflections. There is, for example, the issue of private legal conflicts involving mainland China, Taiwan, Hong Kong, and Macau under "one country, two systems." Liu Jingwei has systematically presented the relevant experience of other regions in international society concerning private law unification, and analyzed the humanistic, economic, and political basis for the unification of private law in mainland China, Taiwan, Hong Kong, and Macau.<sup>39</sup>

#### **iv. Background of the "one country, two systems" Taiwan formula in practice**

Since the 1970s, with the rapid pace of change in motherland reunification and cross-strait relations, the thinking on, and exploration of, the 1C2S solution to the Taiwan issue have also seen constant



adjustment and development. The forty year-plus process of evolution in motherland reunification and cross-strait relations has constituted a background of practice for going from solving the Taiwan issue based on the 1C2S approach to exploring the “two systems” Taiwan formula. Specifically, the existing research mainly analyzes three aspects of past practice with the 1C2S Taiwan formula: the evolution of the cross-strait relationship, the reaction to “one country, two systems” in Taiwan, and the international environment for Taiwan-related diplomacy.

**1. Background on the evolution of the cross-strait relationship.** The 1C2S Taiwan formula must be rooted in the specific practice of cross-strait relationship development and adapted to the actual conditions of the cross-strait relationship, and must serve the real need of promoting the two sides of the Strait to ultimately move towards reunification. The practice of cross-strait relationship development in recent years has mainly involved such content as the peaceful development of cross-strait relations, cross-strait political and economic interaction, and new discourse on Taiwan-related work. Li Jiaquan was relatively early in drawing out the close relationship between “one country, two systems” and construction of a framework for cross-strait peaceful development. Deng Xiaoping’s “one country, two systems” is itself aimed at peaceful development, in that it seeks to promote the peaceful resolution of cross-strait issues or the Taiwan issue.<sup>40</sup> The analysis of Yan Anlin, Zhang Zhixin and colleagues argues that the connotations and characteristics of the important expositions on Taiwan since the 18th National Party Congress, as well as the progress and experience in the cross-strait relationship’s peaceful development since 2008, have opened up the initial practice in the exploration of the Taiwan model of 1C2S, and have accumulated the necessary foundation for 1C2S to promote the reunification of the motherland.<sup>41</sup> Li Fei and Liu Cheyuan specifically discuss the importance of cross-strait political and economic interaction for the realization of 1C2S. They argue that adopting an appropriate strategy of “separating politics and economics,” and constructing cross-strait economic cooperation mechanisms that meet the needs of the developing situation, would help cross-strait economic cooperation advance from functional integration to institutional integration, thereby promoting cross-strait political cooperation, and finally achieving peaceful reunification.<sup>42</sup> Zhu Weidong systematically illustrates the reunification strategy, from the necessity and inevitability of unification, to how and what to unify, and discusses the past practice of the 1C2S Taiwan formula in the new era.<sup>43</sup>

**2. Background of perceptions of “one country, two systems” among different parties in Taiwan.** If the 1C2S Taiwan formula is based on the practice of peaceful reunification across the Taiwan Strait, research and explorations of the “two systems” formula obviously cannot ignore reactions of the Taiwan side. They must fully consider the social status of “one country, two systems” in Taiwan, and comprehensively analyze the perceptions and attitudes of the Taiwan authorities and society toward “one country, two systems.” Starting from the basic approach of placing hope in the people of Taiwan, the mainland side has always actively striven for “one country, two systems” to gain more acceptance and support from Taiwanese society. However, for a long time, “one country, two systems” has been stigmatized by the authorities in Taiwan, especially by the “Taiwan independence” separatist forces, and some of our compatriots in Taiwan have been misled and become prejudiced. Most scholars focus on the manifestations and causes of “one country, two systems” stigmatization in

Taiwan, as well as countermeasures against it. Wang Zhiguo has pointed out that the questioning and smearing in Taiwan of “one country, two systems” are mainly reflected in areas such as the “dwarfing and annexation” of Taiwan, the “undemocratic nature,” the system’s design defects, and the failure of the “Hong Kong model.” Wang also presents a relatively comprehensive analysis of the reasons behind this, mainly including the significant differences between the two sides of the Taiwan Strait over political positioning, the Taiwanese people’s doubts and resistance with regard to reunification, and the negative impact of the “Hong Kong model.”<sup>44</sup> Yan Anlin et al. specifically examine the KMT’s and DPP’s negative perceptions of “one country, two systems,” and their reasons, with the key for the KMT being that they want “two systems” but not “one country,” while the DPP pursues “Taiwan independence.”<sup>45</sup> Aside from this, based on an analysis of poll results in Taiwan society, Shao Zonghai emphasizes that the majority of Taiwanese people who choose “maintaining the status quo” actually agree implicitly with “two systems,” thus indicating that there may be room for the development of “one country, two systems” in Taiwan.<sup>46</sup>

**3. Background of Taiwan-Related Diplomacy.** The Taiwan issue is fundamentally a domestic issue for China, but due to complex historical and practical factors, since its inception it has inevitably been subject to influence and interference from the international situation and external forces. The international environment of Taiwan-related diplomacy has long constituted the key external context for exploring the 1C2S formula for Taiwan. Therefore, exploration of the 1C2S Taiwan formula requires a full understanding and proper handling of external factors and international conditions related to Taiwan, especially the Taiwan issue in Sino-U.S. relations. Li Yihu discusses the international prerequisites for the success of the 1C2S Taiwan model in terms of two aspects: consolidating and strengthening the “one China” arrangement in the international arena, and defusing the United States’ negative influence on Taiwan. He points out that, as the mainland accelerates the process of peaceful reunification, the United States may gradually increase its obstruction of the practice of the 1C2S Taiwan model.<sup>47</sup> In discussing the theoretical innovation of the 1C2S Taiwan model, Yan Anlin et al. have specifically examined new changes in the international environment on the Taiwan issue, including the internal logic and uncertainty of Trump’s policy toward Taiwan, and the historical and contemporary parallels of the Taiwan policy of Japan’s Abe administration.<sup>48</sup> In addition, some scholars have focused on the international environment when 1C2S was first unveiled. They suggest that, on one hand, 1C2S was called for by the world’s historical trend and, on the other hand, it was also the result of the struggle and maneuvering between socialism and capitalism, represented by China and the United States, in the post-war “Cold War” period.<sup>49</sup>

#### **v. Comparative analysis of the “one country, two systems” Taiwan formula and the “one country, two systems” Hong Kong-Macau model**

Comparative analysis on the 1C2S Taiwan formula and the 1C2S Hong Kong-Macau model has consistently been a hot topic drawing interest in the academic community. On the whole, scholars have focused mainly on the following two aspects in comparative studies of the two:

**1. Differentiation between the Hong Kong-Macau model and the Taiwan formula.** The 1C2S

Taiwan formula and the Hong Kong and Macau model are both concrete forms for the realization of “one country, two systems,” and there are similarities between the two in terms of their basic connotations. However, in view of the differences in the nature of the Taiwan issue and the Hong Kong and Macau issues, obviously the Hong Kong and Macau model cannot be simply applied to the Taiwan formula,<sup>50</sup> and it is imperative that the differences between them are carefully clarified. Awareness that the 1C2S Taiwan formula differs from the Hong Kong and Macau model comes from Deng Xiaoping’s idea that “the solution to the Taiwan issue can be more lenient than that for the Hong Kong issue.” Based on the idea of “leniency,” one can see that compared to the Hong Kong and Macau model, the Taiwan formula is more open and tolerant, and has broader space for shaping.

In Huang Jiashu’s analysis, the most important differences between the “Taiwan model” and the Hong Kong-Macau model are: first, in the Hong Kong-Macau model, the British and Portuguese governments, as the counterparties in negotiations, recognized that the PRC government and the whole of China are, by nature, one and the same, while in the Taiwan model, the Taiwanese authorities refuse to recognize this identity; second, in Hong Kong and Macau there was never a power system operating in the form of a state, while in Taiwan there is a power system that operates in the form of a “state.”<sup>51</sup> Li Yihu sets out from “one country” and “two systems” as two aspects in discussing the differences between the Taiwan model and the Hong Kong and Macau model: first, in terms of the connotations of “one country,” the Hong Kong-Macau model is a vertical relationship between the central and local governments, while the Taiwan model is an “equal” parallel relationship between the two; second, in terms of what “two systems” connotes, aside from retaining its original social and economic systems, Taiwan can also retain military and political operational structures which were not present in the Hong Kong-Macau model.<sup>52</sup>

## **2. The significance of the Hong Kong-Macau model as a reference for the Taiwan formula.**

“One country, two systems” was originally proposed in order to resolve the Taiwan issue, but it was first put into practice successfully on the Hong Kong and Macau issue. Without doubt, the experiences of Hong Kong and Macau have a very important inspirational role to play in the exploration of the Taiwan formula. However, in drawing lessons from this experience, it obviously cannot be a simple matter of repeating and copying, but instead must be rooted in the special circumstances of the Taiwan issue. After all, the Taiwan issue surpasses that of Hong Kong and Macau in both complexity and particularity.

Pan Guohua et al. and other scholars have analyzed the successful experience with 1C2S in Hong Kong as useful inspiration for solving the Taiwan issue, from four points of view: the first is institutional construction, building the “framework for the peaceful development of cross-strait relations;” second is prioritizing economics, the fundamental driving force for the integration of the mainland, Taiwan, Hong Kong, and Macau; third is vigilance against populist politics, implementing incremental democratic politics; and fourth is striving for identity, the foundation of popular sentiment for national integration.<sup>53</sup> According to Li Yihu et al., the setting of a transition period before the return of Hong Kong and Macau is where the model of the return of Hong Kong and Macau can be used as a reference for constructing the Taiwan model. Using the Hong Kong and Macau transition period for reference, after the two sides of the Taiwan Strait reach a peace agreement

through political negotiations, they would enter a “pre-transition period.” During this period the two sides would, politically, jointly safeguard sovereignty and territorial integrity on the basis of “one China”; and, economically, accelerate their integration to form an interdependent relationship. After this, the two sides would enter the “post-transition period” on the basis of jointly studied and formulated constitutional laws.<sup>54</sup> With regard to the Hong Kong-Macau model as inspiration for cross-strait reunification, Wang Yingjin makes four points: first, a smooth transition period should be arranged before reunification; second, the specific operational techniques should be flexible; third, the status quo in Taiwan should be maintained to the maximum extent after reunification; and fourth, the foundation of cross-strait relations will be created by way of legalization.<sup>55</sup>

### **III. Analysis of Research on the “One Country, Two Systems” Taiwan Formula**

#### **i. Main characteristics**

Viewed as a whole, the existing research has carried out multi-dimensional, multi-perspective and multi-level basic research and analysis exploring of the 1C2S formula for Taiwan, and has achieved rich theoretical results and practical effects. It has provided important intellectual support for the development of cross-strait relations since the late 1970s and the promotion of the peaceful reunification of the motherland. Upon further analysis, the current research results on the mainland’s 1C2S Taiwan formula mainly reflect the following major features:

**1. Combination of history and reality.** On one hand, scholars have not only paid close attention to the origins in thought of the 1C2S approach, and focused on exploring the historical origins of applying the 1C2S approach to solve the Taiwan issue, but have also systematically examined the historical background and traced the historical threads of the 1C2S Taiwan formula’s formation and development. On the other hand, existing research is also based on the real situation, with special emphasis on setting out from the real development needs of cross-strait relations at different stages to analyze the basic connotations of the 1C2S Taiwan formula, so as to explore paths for an 1C2S formula for Taiwan.

**2. Uniting openness with principles.** As an important result of the liberation in thought in the early stages of reform and opening up, the 1C2S approach has been characterized by distinctive openness and tolerance since its inception, and this has led to the study of an 1C2S Taiwan formula being characterized by significant openness. This openness is reflected in the study of origins of thought. The focus has been on contemporary Mao Zedong Thought, Western Marxist-Leninist thought, and Chinese historical and cultural thought. Second, in terms of research on the theoretical connotations, it has been rather open and inclusive in terms of theoretical capacity. It has not only involved analysis of mainstream theories such as Marxist philosophy, state structural form, sovereignty and “administrative power,” and constitutional jurisprudence, but has also included the theoretical investigation of some reunification models that are not “one country, two systems.” Of course, while emphasizing openness, the study of the 1C2S Taiwan formula has also always adhered to and upheld certain basic principles and requirements of the 1C2S approach. Regardless of the perspectives from which scholars expand and consider the 1C2S Taiwan formula, they are essentially all based on the

fundamental connotations of the 1C2S principle, namely, “one country, two systems, a high degree of autonomy, and peaceful reunification.” They all adhere to the belief that “one country, two systems, a high degree of autonomy, and peaceful unification” is the best way to achieve national unification.

**3. Combining disciplinary diversity and interdisciplinarity.** First, existing research on the 1C2S Taiwan formula covers a very diverse range of disciplines, including Marxism, political science, law, economics, and so on. Scholars from different disciplines have each examined the origins of thought and theoretical scope of the 1C2S Taiwan formula from their own perspectives, which has widened the ambit of research on the 1C2S formula for Taiwan and made the basic content of study richer and more complete. Second, research on the 1C2S Taiwan formula also exhibits typical interdisciplinary characteristics. In exploring the theoretical basis and implications of the 1C2S Taiwan formula, some scholars have conducted interdisciplinary analyses by integrating the Marxist theory on the state, state structural form theory, and constitutional theory. Some have taken a political economy perspective to focus on the connections between 1C2S and the past practice of cross-strait political and economic interaction. All of this will promote the innovative development of research exploring the 1C2S formula for Taiwan and deepen understanding and awareness of the connotations of the policy propositions in the 1C2S Taiwan formula.

**4. Giving equal weight to theory and practice.** Although 1C2S is more of a policy practice issue, it would be difficult to make its formulation and implementation stable and far-reaching without the support of rich basic theoretical research. At present, research on the 1C2S Taiwan formula basically takes both theoretical and practical orientations into account. On one hand, more and more scholars have begun to delve deeper into the theoretical basis and significance of the 1C2S Taiwan formula, focusing on setting out from a thorough study of basic theory in order to explore the formula’s concrete institutional forms. Li Yihu [et al.]’s *The ‘One Country, Two Systems’ Taiwan Model*” and Wang Yingjin’s *Research on National Reunification Models* are representative of this kind of research. On the other hand, the academic community has all along particularly favored a practical orientation in research on the 1C2S Taiwan formula. Many scholars, based on a practical orientation, have long examined the peaceful development of cross-strait relations and 1C2S, the development of the 1C2S Taiwan formula in Taiwan, the practical significance of the Hong Kong-Macau model for the Taiwan formula, and so on. In recent years, the new practice of 1C2S in Xi Jinping’s important remarks on Taiwan-related work has also produced some excellent results.

#### **ii. Shortcomings and problems in research on the “one country, two systems” Taiwan formula**

First of all, from the perspective of overall frameworks of thinking, there are currently two main problems in the relevant research on the 1C2S Taiwan formula. First, although existing research does give equal weight to theory and practice, in the context of the new era, there is an urgent need for 1C2S Taiwan formula research on both theory and practice to be further enriched and developed in order to keep up with the changing times. In terms of theoretical research, it remains necessary to continue improving both the breadth and depth of the theoretical capacity of the 1C2S Taiwan formula, not only by promptly absorbing the Centre’s new theories, new ideas, and new strategies on Taiwan-related work since the 18th Party Congress, but also by opening up thinking and more

extensively incorporating the excellent theories and research results from Hong Kong, Macau, Taiwan and abroad. With regard to practical research, the practical content of the existing studies has obviously lagged behind, focusing mostly on the practice of cross-strait relations development before the 18th Party Congress. In recent years, cross-strait relations and the international environment for Taiwan-related diplomacy have both undergone profound changes. Therefore, there is a great need to further enrich research on how to better promote exploration of the 1C2S formula for Taiwan based on new content regarding the Taiwan issue and the practice of cross-strait relations development since the 18th Party Congress. Second, there is a relatively obvious imbalance between static and dynamic research on the 1C2S Taiwan formula. Scholars have focused more on the institutional arrangements and sources of thought of the Taiwan formula at the static level, while research on dynamic changes in the context of Taiwan's formula in practice has been lacking. Static research on the 1C2S Taiwan formula is primarily focused on establishing principles-based fundamental norms and political arrangements for after reunification. Such research falls under analysis of basic connotations and is of course very important. However, in the context of the Taiwan issue's continuous development and evolution, it is also necessary to focus research on the dynamic context of the 1C2S Taiwan formula in practice prior to reunification.

Moreover, from the perspective of specific content, the study of the 1C2S Taiwan formula is still inadequate in the following four respects and awaits further strengthening. The first is differentiation along the reunification process. Studies have paid more attention to the post-reunification situation, focusing on how to design the post-reunification 1C2S Taiwan formula institutional structure. But there research is lacking on the content of pre-reunification 1C2S and the institutional arrangements for the transition period. To some extent, given that the country has not yet been reunified, it would be of more positive practical significance to conduct thorough explorations of democratic consultation and institutional arrangements for formulating and implementing the 1C2S Taiwan formula prior to reunification. Second, although existing studies have focused on comparative research on the Hong Kong-Macau model and the Taiwan formula, still few have conducted comparative research considering the new situation in the development of the Hong Kong, Macau and Taiwan issues. Of late, the practice of 1C2S in Hong Kong and Macau and the exploration of the 1C2S Taiwan formula have both encountered new problems and new situations, thus making it necessary for us to further consider and analyze the similarities and differences between the two solutions and the significance of the Hong Kong-Macau model's lessons for the Taiwan formula. There are relatively big differences between the Taiwan issue and the Hong Kong and Macau issue in terms of their nature, international factors, historical factors, and practical factors, all of which need to be analyzed more meticulously in light of the new situation. Third, most of the basic theoretical studies on the 1C2S Taiwan formula have been conducted from political science and legal theory perspectives, and mainly explore macro-political issues such as sovereignty and "administrative power," state structural form, and constitutional arrangements. Comparatively speaking, there is a lack of specialized research on issues of micro-governance arrangements involving fields such as Taiwan's society, economy, and culture before and after reunification. Consequently, in the future, it will be necessary to extend research on the 1C2S Taiwan formula "downward," strengthening the focus on more concrete socio-economic and cultural issues, and from there enriching research on concrete forms for realizing the 1C2S Taiwan

formula and the connotations thereof. Fourth, the specialized study of the Taiwan side's perceptions of 1C2S in the new situation needs to be further strengthened. In the final analysis, the policy orientation provides the basic footing for the study of the 1C2S Taiwan formula. Its aim is to propose a reasonable model of reunification that does not violate the one-China principle or the 1992 Consensus, but that also satisfies and is accepted by Taiwan's authorities and its people, thereby actively contributing to the peaceful resolution of the Taiwan issue. In recent years, under the influence of a series of complicated factors, the state of public perceptions of 1C2S in Taiwan has become increasingly grave, so there is an urgent need to strengthen research and offer policy thinking in this area. Starting from the basic requirement that the concrete realization of 1C2S in Taiwan "will fully take into account the realities of Taiwan, fully incorporate the opinions and suggestions of all sectors on both sides of the Taiwan Strait, and fully accommodate the interests and feelings of Taiwan compatriots,"<sup>56</sup> one of the important criteria for a good "two systems" Taiwan formula is that it not be limited to its own conceptual framework. In the design process, it should actively understand the objective research of Taiwanese scholars and the opinions and feelings of the Taiwanese people, and then take whatever is reasonable.

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