



Degree Program in International Relations

Course of Crisis Communication

Ambiguity in Multilingual Agreements:  
The Endless Crisis of Communication

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## Abstract

The multilingual nature of international treaties is often regarded as a source of linguistic and legal ambiguities, which in turn can escalate into diplomatic crises. These ambiguities are often a deliberate design choice of a multilingual treaty that represent a lack of political will among state actors to resolve the conflict. This research first deconstructs the legal and linguistic foundations of these ambiguities, drawing on principles like Article 33 of the Vienna Convention and theories of cultural-legal divergence, to explain *why* multilingual treaty can support multiple incompatible interpretations. Crisis communication theories then serve as the major critical basis to explore *how* these ambiguities are politically operationalized by states and contribute to more real-life crises. This research argues that treaty ambiguities often reflect *constructive ambiguity* as a deliberate design choice and a lack of political will among state actors to resolve the conflict, and that the ensuing crisis communication is a strategic performance designed to manage reputation rather than committing to a substantive long-term solution. A comparative analysis of United Nations Security Council Resolution 242 (1967), the Sino-British Joint Declaration (1984), and the Minsk Agreements (2014-2015) demonstrates this pattern by showing that each agreement itself becomes a tool for each state to assert its own legitimacy and entrench the crisis by effectively foreclosing the possibility of renegotiation. This thesis concludes that, while multilingual treaties are meant to preserve the equal linguistic and cultural standing of the negotiating parties, they are systematically exploit by state actors to enhance their own reputation in a conflict where the costs are ultimately borne by the people.

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## Introduction

International agreements, whether bilateral or multilateral, are widely regarded as the principal mechanism for managing state relations and preventing conflict. And yet why do so many international agreements fail, despite being signed by all parties? As the name suggests, agreements are meant to contain understanding and obligations agreed upon by all the signing parties. And yet in practice, many collapse soon after their adoption. In some cases, the collapse stems from to an external political shift, such as when U.S. unilaterally withdrew from the 2015 Iran nuclear deal (JCPOA) and the Paris Agreement under President Donald Trump, leading to severe disruption of implementation. In other cases, agreements collapse due to domestic political backlash, such as when the U.S. Senate refused to ratify the 1997 Kyoto Protocol after U.S. Vice President Al Gore signed it on behalf of the Clinton administration. Institutional fragility, power asymmetry, and lack of enforcement mechanisms are also well-documented factors that contribute the implementation failure of an international agreement. Beyond those, this research focuses on one particular factor that shapes both the formation and failure of international agreements: the ambiguity of language inside the agreement itself. In such case, what is written in the text and finally adopted as an official political and legal document is an appearance of consensus that obscures fundamental disagreements. This is particularly evident in multilingual agreements where, as this thesis will demonstrate, linguistic ambiguities exist as a deliberate design choice that allows each party to advance incompatible interpretations of obligation. This research reveals how such linguistic ambiguity leads to an entrenchment of diplomatic crises and reflects a fundamental lack of political will from state parties to achieve a genuine long-term resolution.

The study addresses a significant gap in existing scholarship by moving beyond traditional legal and linguistic analyses to explain the communicative dimension of treaty ambiguity. While international legal principles, such as Vienna Convention on the Law of Treaties (among others, treaties should be interpreted in good faith) and equal authenticity (all language versions of a treaty are equally valid),

are intended to resolve interpretative disputes and textual ambiguity, they are insufficient in practice when ambiguities stem from a deeper political and cultural divergence. Simply affirming that texts are equal and that interpretation must align with the treaty's purpose does not automatically resolve the actual differences. Likewise, while linguistic theories explain *how* minor features of a language, such as prepositions or articles, can lead to lexical ambiguity (a single word has multiple meanings) and structural ambiguities (one sentence constructive allows for multiple interpretations), they fall short of considering the agency factor of these ambiguities: that is, *why* those ambiguities are put inside the agreement in the first place without clarification during negotiation. This deliberate decision, often made to accommodate irreconcilable political interests, is known as *constructive ambiguity*. It moves the conflict from negotiation to the post-agreement implementation phase and is a powerful indicator of whether the agreement in question will reach a productive outcome or merely defer a crisis. To explain why treaty ambiguity becomes political consequential, this thesis relies on crisis communication theories to analyze how states operationalize those ambiguities in public discourses. This is the central analytical focus of this study, as it moves beyond simply identifying the source of ambiguities to explain how state parties exploit them in a diplomatic crisis: securing an agreement on paper, feigning compliance, and preserving a pathway for future conflict.

To substantiate this argument, the study adopts a qualitative, comparative case study approach for three international agreements that exemplify distinct forms of ambiguity. United Nations Security Council Resolution 242 (1967) demonstrates a clear example of lexical ambiguity, where a dispute over the presence of absence of a definite article in the English and French version has fueled decades of contradictory interpretations and military confrontations. The Sino-British Joint Declaration (1984) concerns with conceptual ambiguity, as the key term "a high degree of autonomy" promised for Hong Kong carries fundamentally incompatible meanings within British and Chinese constitutional traditions. The Minsk Agreements (2014-15) illustrate structural ambiguity, where vague sequencing of actions have led to a functional paralysis that undermine the entire peace process. By applying core

theories from crisis communication, including Situational Crisis Communication Theory, Image Restoration Theory and Framing Theory, this study reveals the rhetorical strategies adopted by state parties in official statements and diplomatic exchanges to legitimize their actions and assign accountability to their opponents.

This thesis is structured as follows. Chapter 1 presents an interdisciplinary theoretical framework that integrates key concepts in international law, linguistics and crisis communication, explaining precisely how these concepts can be operationized in a treaty-language related dispute. Chapter 2 outlines the research methodology and its limitations. It justifies the use of qualitative and comparative approach that enables both a parallel analysis and attention to each case's specific context, while acknowledging the data constraints and other challenges such as generalization of case studies. Chapter 3 establishes a comprehensive literature review, covering the general theoretical discussion related to treaty interpretation and case-specific analysis. Chapter 4 provides a detail analysis of each case, examining the historical background of the dispute, the linguistic and legal source of treaty ambiguity, and the crisis communication strategies surrounding the key terms and phrases. Chapter 5 is the concluding chapter that synthesizes these findings and argues that in the absence of genuine political commitment to resolve the conflict, ambiguous treaty language become a cynical tool for perpetuating international crises under the guise of diplomatic flexibility.

# Chapter 1 Theoretical Framework

This chapter reviews the existing literature in three intersecting fields: international legal interpretation, linguistics, and crisis communication theory. While legal and linguistic theories have traditionally focused on how multilingual texts generate interpretative uncertainty and contestation, this thesis is mainly concerned with what happens when such contestation affects public and diplomatic communication. From a crisis communication perspective, disputes over multilingual treaty language can easily transform from a legal or linguistic disagreement into real diplomatic tensions and even military retaliations. And in those situations, state actors need to adopt strategic messaging, framing, and blame-shifting to maintain their credibility especially before the domestic audience to preserve its legitimacy. This chapter adopts an interdisciplinary understanding of treaty language disputes as not only an issue of technical disagreement but also a catalyst for political crises. Legal and linguistic theories will be primarily employed in case analysis to identify and explain the specific provisions that have triggered contestation and communicative conflicts among state actors. Crisis communication theories then serve as the major analytical tools for understanding how state actors construct and respond to those contested interpretations, as evidenced in their public speech, media discourse, diplomatic exchange, or political action. Table 1 summarizes all the theories cited and their key concepts.

**Table 1. Summary of Theoretical Frameworks**

Disciplinary Origin	Theory/Concept	Key Concepts
International Law	<b>Rules of Interpretation</b>	<i>Treaties should be interpreted in good faith, using the ordinary meaning of the words in context and aligned with the treaty's purpose</i>
	<b>Supplementary Means</b>	<i>If interpretation leads to unclear meaning or absurd results, preparatory work and background context may be used to clarify it</i>
	<b>Equal Authenticity</b>	<i>All language versions of a treaty are equally valid, and no version has legal supremacy unless otherwise agreed</i>
Linguistics	<b>Lexical Ambiguity</b>	<i>A single word or phrase has multiple meanings</i>
	<b>Structural (Syntactic) Ambiguity</b>	<i>Sentence structure allows multiple interpretations</i>
	<b>Speech Act Theory</b>	<i>Language performs actions (e.g., promises, declarations)</i>
	<b>Conceptual Ambiguity</b>	<i>An abstract idea that can be interpreted differently based on conceptual frameworks</i>
Crisis Communication	<b>Situational Crisis Communication Theory (SCCT)</b>	<i>Crisis response strategies (denial, deflection, bolstering); attribution of responsibility</i>
	<b>Image Restoration Theory</b>	<i>Organizations (or states) attempt to restore their reputation after a damaging event.</i>
	<b>Framing Theory</b>	<i>Diagnostic, motivational, and prognostic framing; control over problem definition</i>
	<b>Staged Crisis Model</b>	<i>Crises evolve through phases. Each stage invites different communication strategies.</i>
	<b>Stakeholder Theory</b>	<i>All actors involved in or affected by the crisis are stakeholders, depending on their levels of impact and influence</i>

## 1.1 Multilingual Treaty Interpretation in International Law

While this thesis repeatedly refers to the ambiguity inside the texts as *treaty ambiguity*, it is important to clarify that the analysis is not limited to formal treaties in the strict legal sense. In international law, a treaty is a formal, legally binding agreement between states under international law, typically registered within the United Nations in accordance with Article 102 of the UN Charter. Numerous other forms of instruments, such as declarations, joint communiqué, and certain non-binding UN Resolutions, also possess significant legal and diplomatic weight even though they are not considered as treaties. Table 2 summarizes the types of international instruments with their definition, multilingual requirements and examples. For instance, while the Sino-British Joint Declaration is a bilateral treaty formally registered with the UN, the Minsk Agreements are only political accords with limited signatory status and informal structure. Similarly, UNSC Resolution 242 is not a treaty as it is legally non-binding. Nevertheless, despite their differing legal status, these instruments function as *de facto* treaty-like commitments because they outline international commitments, define responsibilities, and generate political and legal expectations (though not formal legal obligations which only exist with treaties). And thus, *treaty ambiguity* is a broad analytic term in this thesis that does not just consider ambiguity in formal treaties *per se*, but in any international legal or quasi-legal

document that claims to resolve conflicts but contains strategic linguistic indeterminacy. In fact, it is the shorthand term that scholars generally use when referring to a wider spectrum of international agreements.

**Table 2: Types of International Instruments**

Term	Definition	Multiple Languages?	Binding?	Examples
<b>Agreement</b>	A broad umbrella term that includes treaties and other arrangements (e.g., MoUs, declarations, etc.).	Depends on the exact type	Depends (on form/intent)	Paris Agreement; Minsk Agreements
<b>Treaty</b>	A formal, legally binding agreement between states under international law. Usually registered with the UN.	Depends: could be English–French, or any combination agreed by parties	Yes	Treaty of Versailles; UN Charter
<b>Convention</b>	A multilateral treaty, often adopted under an international organization and open to many states.	Yes: the official languages of the hosting organization	Yes	Geneva Conventions
<b>Protocols</b>	A supplementary treaty that adds to or modifies a convention or treaty.	Yes: same as the parent treaty/convention	Yes	Kyoto Protocol; Protocols to the Geneva Conventions
<b>Declaration</b>	A formal statement of principles or intentions. Often non-binding unless tied to a binding instrument or practice.	No formal requirement, and depends on the forum (e.g., UN, G7, EU)	Depends (on intent/practice)	Universal Declaration of Human Rights (non-binding); Declaration of Principles (binding in some cases)
<b>UNSC Resolution (Chapter VII)</b>	Security Council resolutions under Chapter VII of the UN Charter; binding on all UN member states.	Yes: in Arabic, Chinese, English, French, Russian, Spanish	Yes	UNSC Resolution 678 (Iraq); 1973 (Libya)
<b>UNSC Resolution (non-Ch. VII)</b>	Recommendations or expressions of opinion without enforcement power. May still carry strong political weight.	Yes: in Arabic, Chinese, English, French, Russian, Spanish	No	UNSC Resolution 242 (Middle East conflict)
<b>UNGA Resolution</b>	General Assembly resolutions expressing collective opinions or recommendations. Not legally binding.	Yes: in Arabic, Chinese, English, French, Russian, Spanish	No	Resolution 194 (Palestinian refugees); Resolution 2758 (PRC recognition)
<b>Memoranda of Understanding (MoUs)</b>	A mutual expression of intent or understanding between parties. Not binding unless explicitly stated.	No requirement: sometimes there are parallel texts, sometimes just one.	Depends (on explicit terms)	U.S.–China MoU on climate cooperation (non-binding)
<b>Exchange of Notes / Letters</b>	A series of diplomatic correspondences forming an agreement. Can be binding if intended as such.	No requirement: usually just one language (e.g., English)	Depends (on intent)	U.S.–Japan Security Agreement (Exchange of Notes)

Within international law, multilingualism is not only practically necessary to keep all parties informed but also normatively essential to uphold the principle of fairness and equality. If only one language is used when negotiating and writing the treaty, it risks privileging states that speaks that language natively and prevents all parties from fully understanding and agreeing on what they are signing. Article 33 of the Vienna Convention on the Law of Treaties (1969) affirms that all authentic versions of a treaty are equally authoritative. In the case of linguistic divergence, translators are expected to reconcile the subtle differences across all authentic texts based on the object and purpose of the treaty. One of the main challenges, as Shelton (1997) and Kuner (1991) both emphasize, is that treaty

negotiations typically occur in one or two working languages, most commonly in English as the *de facto* primary drafting language; other versions for the participating states are often produced through translation during the final state of negotiation, frequently under time constraints and lacking the full political context. As a result, translated versions may inadvertently shift the emphasis and scope of certain treaty term due to the inherent difficulty of incorporating legal and cultural nuance across legal-linguistic systems. Equally, the principle of equal authenticity is insufficient when linguistic disputes arise not merely from translation choices but from a fundamental divergence in the legal culture and syntax. For instance, civil law and common law systems differ fundamentally in terms of legal reasoning: civil law systems (in most of continental Europe, Arab states, Ukraine, and Russia) emphasize codification and language precision based on written statutes, whereas common law systems (U.S., UK) focus on on judicial precedents and case-specific contextual interpretations. The notion of presumed equivalence is thus challenged by the fact that the same legal constructions may carry different operational weight in different legal traditions. Empirical studies of high-level institutional practice reveal how these theoretical challenges can yield to pragmatic reality. Inside the European Union, Fernández (2020) identifies how internal legislative process increasingly prioritize English and French versions, despite the equal validity of all 24 official languages. Similarly, in World Trade Organization where English, French and Spanish are recognized as three official languages, dispute settlement panels have inconsistently applied interpretative tools and treated the English version as the *de facto* master text; French and Spanish versions were used merely to confirm the English interpretation rather than as independent legal references.

Answering to challenge of privileging one language in international disputes, Broglio and Ortino (2024) propose a “comparative translation paradigm” for legal translations, especially considering treaty provisions in different languages may not entail the same legal obligations. A cross-jurisdictional analysis is thus necessary to incorporate both the legal and linguistic perspective. Arginelli (2015) elaborates on this line of critique by highlighting how minor linguistic features, such

as prepositions, modal verbs, and definite or indefinite articles, can lead to significant legal ambiguity. Furthermore, those minor details may be the result of deliberate vagueness to accommodate conflicting political interests, characterized by Kakoullis and Malkani (2021) as “productive ambiguity” in multilingual legal texts. While certain ambiguity is deemed practical and necessary during diplomatic negotiation, it becomes problematic when states insist on their own legitimate interpretation and give rise to diplomatic tensions, an issue apparent in all case studies mentioned in this thesis.

These legal framework helps explain why interpretative flexibility are common in multilingual treaties, particularly due to equal authenticity, concession seeking and translation asymmetries. They show how treaty ambiguity becomes available for contestation, but they do not give a full account of how meanings and intentions can be constructed and instrumentalized in communication. To better understand the interpretative instability in multilingual treaties, it is necessary to complement the legal framework with linguistic theories that explain how ambiguity occurs at the semantic and pragmatic levels.

## 1.2 Linguistic and Semantic Challenges in Treaty Interpretation

Linguistic theories are especially relevant to multilingual treaties, as those texts often prescribe actions, impose constraints, or establish normative communicative obligations across diverse legal and cultural systems. Treaties are a type of legal instrument that usually carries a formal structure; their language possesses a legally binding force and a level of precision that defines state responsibilities, duties, and behaviors, while still allowing space for strategic maneuvering. And thus, legal language in treaties and other international agreements is not merely descriptive; it is performative as well. Drawing from the speech act theory from Austin (1962) and Searle (1976) about the distinction between constative and performative utterances, international treaties can be regarded as speech acts that not only describe reality but also bring it into being. In another words, treaty

language is not neutral; it is constitutive of international obligations. For example, when a treaty declares that “X shall have legal personality”, the statement itself enacts a change of legal or social status, producing a legal consequence.

Building on this, discourse analysis emphasizes how meaning in legal treaties extends beyond literal semantics in a language into the realm of power, context, and ideological framing. Legal texts are interpreted based on pre-established power, authority, and legitimacy. As Fairclough (1995) argues, discourse not only frames social realities but also plays into geopolitical expectations and normative frameworks in the legal sphere. In the context of multilingual treaties, discourse analysis is particularly useful: the same clause may be semantically accurate in different translations and yet carry different pragmatic implications in the actual diplomatic practice. This insight is paramount to the reading of treaty provisions in this thesis, as contested words and clauses result not from translation errors, but from different interpretative frameworks that are anchored in a political, cultural and institutional context.

From a semiotic perspective, legal terms function as signifiers; that is, they are linguistic symbols that acquire meanings only within a specific cultural framework. Unlike words in ordinary language, legal terms such as sovereignty and autonomy, already having different meanings across branches of legal science (from legal theory to legal philosophy to constitutional law), are a legal construct that is shaped by distinct historical memories, constitutional traditions or political ideologies of a community. This makes legal terms susceptible to semiotic divergence, a condition in which language retains both precision and flexibility to accommodate multiple readings, sometimes even contradictory. As Arginelli (2015) explains, such divergence is often managed through “managed indeterminacy,” where language is deliberately constructed for having a binding legal force and flexibility in order to accommodate multiple readings. This concept provides another theoretical lens for understanding why ambiguity is sometimes necessary to reach an international treaty and may

become a source of communication breakdown in the end: beyond technical or linguistic challenges, some ambiguities in treaties are deliberately crafted.

A recurring theme across all three case studies is the idea that the ambiguity in treaty language is a deliberate strategy during negotiation and post-agreement interpretation. Zartman (1985) refers to this as constructive ambiguity: treaty languages are intentionally left vague or open-ended to facilitate negotiations that are likely to collapse due to the conflicting interests of states and to allow multiple interpretations. Odell (2000) similarly notes that negotiators often leave sensitive terms undefined to allow parties to sign agreements without resolving underlying substantive disagreements. Kakoullis and Malkani (2021) expand this point by emphasizing that terms such as “*autonomy*,” “*withdrawal*,” or “*special status*” that have diverse implications in different legal and political traditions are often left undefined inside the treaty. While such ambiguity can build up consensus during negotiations, Zartman (1985) warns that deliberately vague drafting often shifts conflict from the negotiation table to the implementation phase, enabling states to interpret obligations in self-serving ways. It becomes highly consequential from a crisis communication perspective, as it allows states to contest and reframe their perceived treaty obligations in moments of tension. This thesis therefore treats constructive ambiguity as both a deliberate drafting technique and a communicative instrument actively employed in international discourse.

Additionally, not all legal instruments produce the same degree of legal obligation. Both Chinkin (1989) and Goldman (2012) note that while many international agreements are intended to create enforceable legal obligations, some, such as political declarations, memoranda of understanding, or joint statements, carry diplomatic and normative weight but are not subject to formal judicial enforcement or dispute settlement mechanisms. Their effectiveness depends largely on the reputational costs of noncompliance rather than legal consequences, making compliance a matter of political credibility rather than legal obligation. These Politically binding instruments are more useful

in situations where states are reluctant to commit concrete legal commitments. This distinction is crucial when considering treaty ambiguity because in political binding agreements, states rely more on narrative construction and reputational management to deflect non-compliance and influence public opinion.

Linguistic theories provide a more technical understanding for examining how key terms are constructed and interpreted diversely in the case studies that follow. Linguistic ambiguity is not only a technical issue; it is also embedded in systems of meanings and interpretations, resulting in ongoing contestation over how key terms and clauses should be understood. It is a dynamic that becomes especially consequential for international crisis communication.

### 1.3 Crisis Communication Theories and Treaty Ambiguity

While legal and linguistic theories are useful to explain why multilingual treaties may contain ambiguity, this thesis posits that such ambiguity is not only a technical or doctrinal problem, but also a communicative instrument used strategically in diplomatic exchange. From a theoretical perspective of crisis communication, contested treaty interpretations not merely disagreements over legal technicalities. They can escalate into public crises that state actors seek to manage in real time through public speech, media framing, political action to shift responsibility and control narrative. This section presents the core theories in the field of crisis communication that underpin the thesis's primary analytical lens, focusing on how state actors manage and respond to multilingual treaty disputes through strategic communication.

Identifying the principal actor in a crisis is a prerequisite for mapping the communicative dynamics. Freeman's (1984) Stakeholder Theory places actors that are directly and indirectly involved in a crisis into two broad categories: primary stakeholders (those who formally and materially involved in producing the crisis, such as signatory states for the treaty) and secondary stakeholders (those who

are not directly involved but still affected by the crisis, such as media, advocacy groups, and the general public). Depending on different crisis situations, the categorization may be more nuanced and diverse. In the context of treaty ambiguity disputes, same actor can shift category or even overlap depending on whether the analysis focuses on stakeholder position in the treaty process or in the communication crisis that follows. This study defines the primary stakeholder in relation to their formal and direct participation in negotiating, drafting, signing and implementing the treaty, such as heads of states and regional representatives. Secondary stakeholders are actors that exert significant influence over its interpretation and public reception, such as foreign spokespersons, legal advisors, media and activist groups.

To examine how stakeholders rhetorically react to treaty ambiguity, this thesis also draws on Situational Crisis Communication Theory (SCCT) as the primary analytical framework. SCCT, developed by Coombs (2007), first identifies stage-based models to analyze the evolution of a crisis: pre-crisis (where an issue starts to emerge with early signals and warnings), crisis event (where the issue triggers a crisis, damages reputation, and requires an immediate response), and post-crisis (where actors actively implement recovery plan and image repair). In parallel, Fink (1986) outlines a four-stage model: prodromal (the early warning stage of a crisis), acute (the crisis erupts in public and requires an immediate damage control), chronic (the aftermath where investigations and negotiations take place), and resolution (the closure where crisis is resolved, either positively or negatively, reputations are rebuilt, and lessons are learnt). These frameworks will allow the analysis to chronically track the temporal and strategic shift in treaty ambiguities, namely how they emerge from an international legal document, how they escalate into diplomatic and political tensions, and how they impel stakeholders to adopt reputational management efforts.

Within different stages, crisis communication theories also classify key strategies adopted by stakeholders based on how they perceive their responsibility for the crisis. When ambiguous treaty

language produces competing interpretations, the attribution of blame and legitimacy plays a crucial role in shaping communication strategy. According to SCCT, actors may tailor their responses based on whether they are perceived as victims or responsible (partially or fully) for the event, adopting strategies such as denial, justification and corrective action. In the case of multilingual treaty disputes, state actors often seek to reduce perceived responsibility by shifting blame onto strategic issues, such as unclear word choices, translation difficulties, or the provoking action from the opposing party. These behavior patterns will be examined through official statement and press release in the three case studies. For example, differing readings of a key territorial clause in a United Nations resolution allowed parties to justify opposing positions on withdrawal obligations, with each side emphasizing the language version most favorable to its stance. This illustrates how even a small syntactic divergence can trigger diplomatic and political tensions.

In addition to SCCT, Benoit's Image Restoration Theory (1995) outlines a series of communication strategies for preserving reputations during a crisis: 1) denial, 2) evasion of responsibility, 3) reduction of offensiveness, 4) corrective action, and 5) mortification (apology). Mortification is quite rare in international politics particularly in cases where the clarity of legal language itself is contested, since states are sovereign actors that do not wish to undermine its own legitimacy and dignity. Justification, denial, or minimization of damage are more common for states to claim that their interpretation is consistent with the treaty's intent or that ambiguity is unavoidable. SCCT also divides actors into three major groups by counting the perceived accountability for a crisis to reputational risk: 1) victim clusters, such as natural disasters or external attacks, are situations in which actors are thought to bear little or no responsibility; 2) accidental cluster, where accountability is present but is viewed as inadvertent or unavoidable (e.g., technical failures); 3) preventable cluster, where actors held to a high standard of responsibility as a result of their intentional negligence. Each cluster predicts a different communicative outcome. Actors in the victim cluster may use strategies of pity and corrective action, whereas actors in the preventable cluster frequently use strategies of denial,

justification, or even attack-the-accuser to shift blames to other actors or even to the accuser. Because states usually question the veracity or intentions of those claiming non-compliance, attack-the-accuser is a common tactic in treaty disputes. Crises are thus not purely objective events but are socially constructed through communication and discourse. As Boin, 't Hart, and McConnel (2009) argue, an event evolves into a crisis when it is publicly framed as a failure, threat or danger in political statement and media narratives. In this view, a crisis also contains elements of perception and storytelling, in addition to facts. When it comes to treaty disputes, interpretative ambiguity is a trigger for crisis especially when opposing state actors evoke competing narratives that define the issue to differently to attribute blame and legitimize its own action.

Equally relevant is the framing theory found in the works of Entman (2004) that focuses on the way by which a message is delivered to the audience. Framing refers to how political actors structure their communication to shape public understanding. In multilingual treaty crises, how a dispute is framed, as in which clause is emphasized, what historical or legal precedent is invoked, and what values are highlighted, significantly influences international perception. Based on Entman's insight into the language of framing, this thesis identifies three mechanisms used by state actors in treaty-related crises: 1) diagnostic framing: assigning blame to the other party, 2) prognostic framing: claiming its own solutions or interpretations to be legally and historically consistent, and 3) motivational framing: calling for support or sympathy from domestic or international audiences. Reputation functions as the motive for state actors to adopt its strategy, and as Ulmer, Sellnow, and Seeger (2007) emphasizes in their work, it is a strategic communicative asset for public institutions or state actors. Their framework complements Benoit's model by showing how concerns over reputations shapes individual messaging and broader narrative positioning over the course of a crises. In treaty disputes, where ambiguity leads to interpretative contestation, states often seek to demonstrate its legitimacy and assert narrative control through framing.

These communication strategies are evident during high-stakes disputes such as those involving UN Security Council Resolution 242 and the Sino-British Joint Declaration. To establish legitimacy and undermine competing interpretations, state actors in both situations frame the disputed provision within their own legal-cultural framework and from a rhetorical and political standpoint, invoking principles of sovereignty, historical justice, or international norms. Similar strategies are also visible in Minsk Agreements, where Russia regularly employed diagnostic framing by accusing Ukraine of non-compliance and motivational framing to justify its military involvement as a form of peacekeeping. Ukraine, in contrast, relied on prognostic frames by emphasizing on its own interpretation of the agreement and invoking international law and OSCE mediations.

Despite the abundance of research on treaty interpretation and on crisis communication separately, relatively little research is conducted to integrate these domains. Legal scholars typically focus on resolving textual ambiguity through doctrinal interpretation under VCLT Article 31-33, while communication scholars emphasize on the initiatives of actors but often overlook treaty as a crisis catalyst. This thesis therefore proposes an integrated analytical framework, in which ambiguous language is both an inherent feature of multilingual legal drafting and a trigger for communicative conflict. These ambiguities, once institutionalized in treaty language, allow state actors to construct conflicting interpretations that are then promoted and defended through strategic diplomatic communication, and often escalating into full-fledged communication crises with long-lasting political and reputational consequences.

Crisis communication theory, accompanied by legal and linguistic point of view, enables a deeper understanding of how ambiguities in multilingual treaties can trigger political conflict. They serve as the analytical backbone of the thesis and will be systematically applied in the following chapters to assess each case study. Though having distinct discursive dynamics, the three case studies are valuable examples for the interchangeable application of the crisis communication theories: SCCT,

Image Restoration Theory, and Framing Theory. In UNSC Resolution 242, they provide a useful perspective for assessing how Israeli and Arab states assign and deflect responsibility for territorial withdrawal through legal argument and public diplomacy. In the Sino-British Declaration, they help evaluate how governments reframe the treaty relevance and state responsibility. And in the case of the Minsk Agreement, those theories similarly reveal how Russia and Ukrainian strategically communicated and framed their narratives to defend their positions.

## 1.4 Conclusion

While treaty interpretation is commonly studied through legal or linguistic frameworks, this research centers the analysis on crisis communication. This approach reflects both the growing visibility of state messaging in international disputes and the disciplinary focus of this thesis within crisis communication. Rather than treating treaty ambiguity as a passive outcome of linguistic or legal complexity, this thesis conceptualizes it as an active trigger for rhetorical contestation among state actors. By analyzing their communicative performances, this study offers a perspective that extends beyond traditional legal analysis and highlights the political and performative dimensions of treaties.

## Chapter 2 Methodology

### 2.1 Research Design and Case Selection

This thesis primarily adopts a multiple-case study approach because it allows for meaningful comparison while preserving the unique context of each case. It will cite three historical examples that represent high consequential treaty disputes: UNSC Resolution 242 (1967), Sino-British Declaration (1984), and Minsk Agreements (2014-2015). Several factors were taken into considerations when choosing these case studies. All are treaties or resolutions negotiated, drafted and communicated publicly in multiple languages which eventually triggered or exacerbated political and diplomatic communication crisis with a persistent effect in the contemporary world. They are representative of different historical eras, legal cultures and geopolitical dynamics typical of their era. And more importantly, they carry different legal statuses regarding ratification: while UNSC Resolution 242 does not require ratification since it is automatically binding, Sino-British Declaration and Minsk Agreements are never ratified by domestic legislature. And thus in all cases, compliance depends on political will, which signals an absence of enforcement mechanism and ramification of non-compliance. This research design helps reveal both case-specific details and broader patterns that illustrate how treaty ambiguities can escalate into communication crises across different political contexts. The purpose of the qualitative and comparative research is not to discuss or determine which version of the conflicting interpretation is correct, but to understand how ambiguity is framed and deployed by state actors when making political decisions and justifying actions.

Discourse analysis is also the main method to analyze how state actors frame treaty ambiguity in public and diplomatic discourse. Bearing in mind how discourse can shape political realities, the study will examine the official speeches and press releases by government officials, public diplomatic statements regarding contested clauses, and state-controlled and international media when addressing the term or clause in question, such as withdrawal, autonomy, territory, and special status.

In tandem, a comparative legal analysis studies the treaty texts themselves to discover the discrepancies across multilingual versions. This includes the English and Chinese version of the Sino-British Joint Declaration, the English and French version of the UNSC Resolution 242, and the English and Russian texts of the Minsk Agreements. These language pairings are selected because they represent the officially negotiated or authenticated treaty language in each case, and more importantly, each language plays a central role in the ensuing communication among state parties.

## 2.2 Method of Analysis

To analyze state actors' rhetorical responses to treaty disputes, the study applies the Situational Crisis Communication Theory (SCCT) and Image Restoration Theory that present strategies such as denial, justification, blame-shifting, and corrective framing in public discourse, which help assess how states perceive and respond to blame and responsibility in treaty-related crises. Specifically, SCCT will help identify how state actors react to the particular diplomatic crisis when accused of violating or misinterpreting a treaty, and Image Restoration Theory further helps examines how state actors restore their reputational legitimacy when facing such accusations. Together they help systematically conclude the communicative strategies deployed by states to manage treaty-related crises.

The research process involves the following steps. Investigation of official narratives across diplomatic and media contexts will be the starting point for sources and data collection. The primary sources include official treaty texts (e.g. original English and Chinese versions of the Hong Kong Joint Declaration; English and French versions of UNSC Resolution 242; English and Russian texts of the Minsk Agreements), UN Resolutions, OSCE Statements (protocols, communiqués, and monitoring mission reports showcasing how institutional bodies frame the agreements), official speeches, press briefings and diplomatic notes by state actors. Secondary sources are found in academic articles and legal commentaries from the perspectives of lawyers, scholars, and legal

commentators for assessing legal terms and clauses, media analysis (including state-controlled and international media on the use of key words such as withdrawal, ceasefire and autonomy), and crisis communication literature directly applicable to treaty disputes. The research first uses legal and linguistic theories to identify structural, semantic, and cultural nuances in ambiguous treaty provisions. It then applies crisis communication perspectives to examine how states respond to and frame these ambiguities in public discourse, using both primary and secondary sources. By integrating comparative legal-linguistic analysis with crisis communication frameworks, this methodology examines how linguistic ambiguity is transformed into strategic discourse and reveals how treaty ambiguity, as outlined in Chapter 1, gains political and communicative salience.

## 2.3 Limitations

It should be acknowledged that this research is subject to methodological restraints and conceptual limitations. First of all, though recognized that there are layers of actors involved in the treaty-making and treaty-executing process, such as translators, legal drafters, international negotiators, and bureaucratic advisors whose influence may not be visible in public record, the study focuses primarily on state actors as interpreters and communicators of treaty language particularly during the moments of crisis. While state actors such as government officials, foreign ministers and diplomatic spokesperson do play a primary role in conveying public messages, framing discourses regarding the contested ambiguous clauses, and engaging directly in crisis communication, it should be noted that there are other actors who shape the form and content of the final text in the beginning.

Secondly, the study does not have direct access to negotiation records, internal records or interviews with policymakers and diplomats to understand the full intentions, compromises or informal exchange that have possibly influenced the final form and content in a treaty. It cannot rely on behind-the-scenes access to the drafting or negotiation process, but only with official documents, public statements, and secondary analysis largely available only in English, and is thus interpretive and

retrospective in nature. Further research may be needed for a comparative linguistic perspective especially relying on secondary analysis in other languages. Consequently, this thesis does not claim to reconstruct hidden motives or internal bargaining processes. Rather, it examines how states publicly frame and leverage treaty ambiguity, treating official discourse itself as a strategic performance that offers valuable insight into how actors seek to persuade, justify, or deflect in the public domain.

Thirdly, this thesis is not attempting to establish a causal relationship between treaty ambiguities and crisis, nor is it attributing a normative solution to multilingual treaty ambiguity by determining the most “correct” version of legal interpretation of any particular clause. Not all cases of treaty language ambiguity necessarily led to diplomatic or political crisis. In certain cases, constructive ambiguity (in other words deliberate legal and diplomatic flexibility when drafting treaty clauses) has actually helped contain or neutralize any potential interpretative conflicts. Other factors, including legal precedent, institutional trust, and low political salience, have led treaty parties to reach tacit understandings or maintain diplomatic equilibrium despite interpretative differences.<sup>1</sup>

Finally, the limited selection of case studies, even though chosen for their legal and geopolitical representativeness, still does not represent all types of multilingual treaties (especially considering the stage of ratification) and the conflicts arising from them. The study seeks to identify recurring patterns in how multilingual legal ambiguity plays a role in strategic communication, and yet it cannot avoid the illustrative nature due to the small scope. Nevertheless, each case represents a distinctive form of treaty ambiguity and contestation: one rooted in linguistic divergence between two authentic

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<sup>1</sup> For instance, the WTO’s Dispute Settlement Understanding (DSU) has often successfully resolved ambiguities around trade obligations without escalating into major crises, as members rely on structured, rule-based adjudication and institutional trust in impartial panels (*Jackson, 1997*). Similarly, in the 1928 Advisory Opinion on the Greco-Turkish Agreement (Treaty of Lausanne, Final Protocol, Art. IV), the Permanent Court of International Justice clarified the procedural role of the Mixed Commission, allowing states to continue implementing the population exchange without disrupting broader diplomatic relations (*Permanent Court of International Justice, (1928)*).

texts, one stemming from a broader difference in the legal-cultural traditions, and the other based on the structure of the agreement itself. This variety ensures that the analysis captures different ways ambiguity can become politically salient.

## 2.4 Conclusion

This research presents the selection of three pivotal case studies as each reveals a specific type of treaty ambiguity and remains consequential in modern geopolitical landscape. It chooses a qualitative and comparative method and primarily a discourse analysis to examine how treaty ambiguity is produced, interpreted, and publicly communicated by state actors in the three examples. It also acknowledges the limitation which might offer useful insights for future studies, particularly regarding the narrow focus on states as the main agents and a lack of access to sources that are not publicly available but remain highly politically relevant. To ground this research within existing academic discussion, the next chapter proceeds to review the literature across international law, linguistics and crisis communication as well as concerning the historical background and treaty-related analysis of the specific case studies.

## Chapter 3 Literature Review

### 3.1 Legal, Linguistic, and Crisis Communication Theories

As chapter 1 has established the legal, linguistic and crisis communication frameworks needed to analyze multiple treaty disputes in this thesis, this chapter moves from theory to scholarship by presenting the existing literature on the three core case studies: United Nations Security Council Resolution 242, the Sino-British Joint Declaration, and the Minsk Agreements. Across these cases, scholars tend to fall into two broad categories of analysis. The first is a doctrinal approach, which focuses on the legal validity of contested provisions and regards ambiguous treaty language as a technical problem to be resolved through principles such as those codified in Articles 31–33 of VCLT. The second is a geopolitical approach, where they analyze these treaties within a broader context of state interests and power dynamics. Both approaches provide valuable insights into why ambiguity exists and how it shapes state behavior, yet both overlook its triggering effect for communication crises. Where ambiguity is deliberate, its very presence in the treaty text signals that states may lack a political will to reach substantive agreement, especially when states also weaponize those contested treaty provisions to justify their positions or shift blames of non-compliance. Where ambiguity is unintentional, it reflects deeper differences in legal cultures that are rarely recognized and reconciled during drafting, leaving interpretative tensions unresolved. Since there is little integrative study addressing how ambiguities are performed and politicized in public discourse, this gap motivates this thesis to adopt a communicative-oriented approach.

The following sections will proceed by examining the literature on each case in turn, showing how ambiguity of a treaty language was constructed, contested, and communicated. It will first explore the extensive scholarly debate over the drafting and meaning of UNSC Resolution 242, then turn to the literature on the Sino-British Joint Declaration, the competing interpretations of key terms like “autonomy” and the more fundamental dispute over the Declaration’s ongoing legal validity. Finally,

it will survey the scholarship analyzing the structural flaws and implementation failures of the Minsk Agreements. By mapping this existing research, this chapter demonstrates that while scholars have expertly the existence of ambiguity, they have paid less attention to the communicative consequences when these ambiguities escalate into public crises; that is, they addressed *what* ambiguities exist and *why* they emerged, but few examined *how* state actors active utilize such ambiguity in public discourse. This gap informs the central argument of this thesis: ambiguous treaty language not only poses a legal and linguistic challenge but also serves as a communicative trigger that reshapes international narratives and diplomatic crises.

## 3.2 Case-Specific Literature Review

### 3.2.1 UNSC Resolution 242

Resolution 242, adopted in the aftermath of the 1967 Six-Day War, is one of the most debated documents in international legal and diplomatic history. The resolution calls for, among others, “withdrawal of Israeli armed forces from territories occupied in the recent conflict” and the “termination of all claims or states of belligerency” while affirming the right of every state in the region to live in peace within “secure and recognized boundaries” (UNSC, 1967). However, much of the dispute has centered on the lack of a definite article “the” before “territories” in the English text (and the presence of it in the French version), which leaves two questions unsettled: whether this mandates a full or partial withdrawal, and whether the “secure and recognized boundaries” are clearly defined (as those territories captured in 1967 by Israel) or yet to be negotiated. While Israel has consistently cited the English version of the resolution to argue that only partial withdrawal is required, Arab states have relied on the French text to support their call for full Israeli withdrawal from all occupied territories. This seemingly minor detail has triggered decades of interpretative disagreement among states and legal scholars, as well as realistic conflicts in international politics.

Legal scholars often contend that such ambiguity in Resolution 242 represents a diplomatic flexibility or a legal manipulation. Lapidoth (2011) for example argues that the absence of the definite article is a deliberate political compromise, since the Resolution 242 was also chosen to be passed under Chapter VI of the UN Charter, which outlines that the Security Council is only giving recommendations to solve disputes between states peacefully. And therefore, Resolution 242 carries non-binding, recommendatory force rather than enforceable obligations. Lapidoth also draws on statements from key drafters, including Lord Caradon and U.S. Ambassador Arthur Goldberg, who confirmed that the ambiguous wording was chosen specifically to avoid prescribing total withdrawal. McHugo (2002) claims that this deliberate ambiguity introduced into the English text has been systematically exploited by Israel and its allies, since the French version, which calls for Israeli withdrawal from “des territoires occupés,” implies full withdrawal. He also describes the drafting process as *diplomatic equivocation*, meaning that the wording was intentionally vague to satisfy the opposing stakeholders of the conflict (Israel and the Arab states) without committing too firmly to a certain position. Similarly, Quigley (2005) warns of the risks associated with privileging one language version over another, since state actors are selectively citing one language version over another to justify political stances. Falk (2007) takes the critique further, suggesting that the resolution’s deliberate ambiguity can turn into *legal orthodoxy* overtime, namely diplomatic inertia that blocks meaningful conflict resolution.

Comparative studies also shed light on how Resolution 242 has been differently framed in public and media discourse. El Ali et al. (2018) observes that Arab media frequently portrays Resolution 242 as requiring complete Israeli withdrawal from all occupied territories, while Philo & Berry (2003) find that the English-language media rarely acknowledges the contrasting position in the English version and the equal authenticity of each language version. The Committee for Accuracy in Middle East Reporting in America (CAMERA), a media-monitoring organization aligned with Israeli positions, similarly argues that English reporting frequently simplifies the resolution’s legal structure by failing

to note its status as a non-binding political instrument, and critiques what it views as systematic oversimplifications in English-speaking reporting, although its analysis is advocacy-oriented rather than scholarly (CAMERA, 2002).

### *3.2.2 The Sino–British Joint Declaration*

It is widely agreed from an academic perspective that the 1984 Sino–British Joint Declaration on Hong Kong represents a deliberate use of strategic ambiguity inside a treaty. Scholars generally view the ambiguity in the Joint Declaration as pragmatic during negotiations but ultimately risky for long-term governance. Tu (2020) explains that the official text of the Joint Declaration affirms a “high degree of autonomy” for Hong Kong and commits to the principle of “Hong Kong people governing Hong Kong,” language that in common-law contexts typically signals robust self-governance. Hong (2021) notes that, in contrast to the British understanding of substantive autonomy, Chinese drafters understood the agreement based on their legal culture that places a stronger emphasis on sovereignty and central authority. These two contrasting perspectives thus left those key terms undefined in the agreement. Wong (2019) contends that this was a deliberate writing choice to smooth the negotiation and reconcile incompatible constitutional traditions. Davis (2024) and Olivia (2024) similarly argue that those undefined key terminologies are necessary to achieve short-term consensus and political aims, but such ambiguity will produce long-term risks for accountability implementation and real political threats. In practice, it produced linguistic silences, as Tsang (2007) and Cheng (2023) note in detail that the agreement did not define how “autonomy” should be exercised beyond its codification in Hong Kong’s Basic Law, nor did it specify governance arrangements beyond the 50-year period after the 1997 handover. In reality, Human Rights Watch (2024) details how the PRC restricted civil liberties in Hong Kong by prosecuting peaceful protest organizers, restricting press and academic freedom, and closing down pro-democracy civil society groups.

The competing official narratives and the treaty's inherent linguistic silences also shaped how non-state actors' reactions. Civil society and protest movements in Hong Kong have often invoked the Declaration as a moral and legal safeguard for their civil and political rights. Cheng (2023) observes that protesters especially in the 2014 Umbrella Movement and the 2019–2020 demonstrations have invoked the Declaration as a legally binding document that guaranteed political rights. On an international stage, Creery (2019) and Lim (2014) document how Hong Kong activists deploy media strategies in transnational advocacy campaigns, including putting up advertisements in major international outlets such as *The New York Times*, *Le Monde*, and *Süddeutsche Zeitung*, and citing the Declaration as proof that Beijing had failed to keep its binding promises on Hong Kong's autonomy and rights.

### 3.2.3 *The Minsk Agreements*

The Minsk Agreements, comprising the initial protocol signed in September 2014 (Minsk I) and the follow-up Package of Measures from February 2015 (Minsk II), were negotiated under considerable international pressure to de-escalate the conflict in Eastern Ukraine. Dumoulin (2024) observes that the Minsk process was politically necessary to avoid immediate escalation in 2014–2025, but it was structurally incoherent as a diplomatic tool because of its ambiguous provisions, poor sequencing, and a lack of enforcement. Allan (2020) similarly characterizes the Minsk process as a product of urgent diplomacy and political compromise, since the parties engaged in the process prioritized conflict containment while overlooking legal precision and enforcement mechanisms. Broglio and Ortino (2024) similarly identifies key legal terms such as “special status,” “decentralization,” and “local self-government” as lacking a harmonized understanding across different signatories, thus making implementation difficult. Language asymmetries further complicated implementation, since the only languages used during negotiations and writing were primarily Russian, without an official

Ukrainian version<sup>2</sup>. Åtland (2020) notes that the absence of a Ukrainian text reflects a structural imbalance because Ukraine has to defend provisions not formally codified in its own language.

The role of media has also received significant scholarly attention as it has a huge impact on shaping public perception. Existing scholarship on media framing of the Minsk Agreements tends to focus on Belarusian and regional pro-Russian outlets, or on broader Russia's wartime narratives; there is a notable gap in studies examining how Russian state media framed the agreements themselves as a diplomatic instrument, as opposed to general war reporting. Katerynych (2023) shows that Belarusian state media and pro-Russian telegram channels routinely portrayed Ukrainian leaders as illegitimate and subordinated to Western influence. These portrayals reinforced the legitimacy of Russian actions and helped Belarus justify its political alignment with Moscow. More broadly, Aleksejeva et al. (2023) document how Russian state media and affiliated online channels engaged in a "narrative warfare" around Ukraine to construct a hostile information environment. Mamedov (2024) also traces the evolution of Russian war narratives over time as a sacred duty and historical mission, which strengthens public support and limits internal criticism because it elevates the conflict above normal political debate. Yet, as these studies focus on wartime or geopolitical narratives, there is limited scholarship specifically examining how Russian state media framed the Minsk Agreements themselves as a diplomatic mechanism (e.g. whether as peace achievements, compromise, or strategic delay). This gap likely reflects both the temporary nature of the agreements and the scholarly focus on broader conflict narratives rather than individual peace frameworks.

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<sup>2</sup> While many formal treaties are authenticated in all official languages of the signatory parties and deposited with an international repository such as the UN Secretariat, the Minsk Agreements are political agreements rather than legally binding treaties. They were negotiated under urgent wartime conditions and drafted only in Russian and English, reflecting the working languages of the negotiation environment rather than an intent to create multiple equally authoritative texts. Similar practices exist in other crisis settlements (e.g., preliminary drafts of the Dayton Peace Agreement), where rapid political compromise precedes any multilingual formalization. However, unlike those cases where full translations were later authenticated, no official Ukrainian-language version of the Minsk Agreements was ever produced, illustrating both the informal nature of the accords and the structural asymmetry faced by Ukraine as a signatory.

On an international context, Friedrich (2025) notes that neutral actors from the “Global South<sup>3</sup>” have largely avoided direct involvement in the Minsk process, as they perceive it to be aligned with Euro-Atlantic interests and structurally too vague to serve as a credible basis for mediation. Meanwhile, OSCE’s monitoring efforts were frequently ignored or selectively interpreted by the conflicting parties, further undermining implementation.

Scholars that engage with the Minsk Agreements have acknowledged the key ambiguity inside the agreements, and yet they typically put more emphasis on the implementation failures and the political narratives adopted by state actors. There is little detailed semantic analysis of key treaty terms. It is also important to underline that there is a lack of access to full negotiation records, draft versions, or internal communications that would clarify the precise intentions of state actors during the drafting process. Existing analyses rely on public statements, media coverage, and retrospective commentary from officials. While valuable, these sources do not reveal the complete strategic calculation behind the agreement. As a result, much of the literature focuses on how the Minsk agreements have been interpreted and instrumentalized after the fact, rather than reconstructing the negotiation dynamics themselves.

### 3.3 Gaps in Existing Literature

One of the gaps in the existing literature is that treaty ambiguity is rarely studied as a contributing factor shaping how conflicts persist or escalate, or as an indicator of states’ political positioning during conflict resolution. Existing scholarship often treats ambiguous provisions as unavoidable strategic compromises that facilitate the initial negotiation and focuses primarily on their interpretive challenges after disputes arise. But this approach overlooks the diagnostic potential of treaty

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<sup>3</sup> Friedrich (2025) uses the term “Global South” to describe states outside the Euro-Atlantic political and security framework. While widely used in policy literature, the term is contested because it groups together highly diverse countries and can carry Western-centric or hierarchical connotations. Here it is cited to reflect Friedrich’s wording rather than an endorsement of its framing.

ambiguity itself, because deliberately leaving a key term undefined may signal that states are not genuinely committing to a shared understanding of political obligations and enforceable solution, which hinders peace and stability in the long-term. The ambiguity produces divergent interpretations and contradictory actions that convert treaties into a symbolic instrument rather than an effective conflict resolution mechanism. In many cases, treaty ambiguity is a design choice that leaves the key issues unanswered and even merits more disputed behaviors from state actors. And thus, treating ambiguity merely as a *post hoc* legal problem misses its role as an early indicator of whether parties are genuinely pursuing durable peace or just using it for postponing the conflicts.

Secondly, there is a lack of research into the substance of interpretation itself. Scholars often note that states disagree on what a treaty term means, but they stop short at addressing *why* these divergences emerge. They tend to treat those interpretive divergences as an outcome rather than the product of a deeper legal-cultural differences. There is little systematic research into how state actors conceptualize key legal terms such as “autonomy” within their own constitutional and political traditions. For example, understanding how Chinese officials interpret “autonomy” in practice often requires drawing on separate research outside treaty analysis; similar conceptual work is also notably absent for Ukraine and Russia regarding the Minsk process. This limits the possibility to achieve a peaceful resolution, as parties tend to reiterate their own interpretation instead of trying to understand how this divergence can occur. Without this level of analysis, crisis communication studies only capture the surface (i.e. *what* states are saying) while missing *why* they say it. Addressing this problem would allow policymakers and mediators to anticipate interpretive conflicts before they escalate into political crises and to design communication strategies oriented toward genuine consensus rather than rhetorical stalemate.

Third, much of the literature is descriptive rather than resolution oriented. Studies of treaty-related disputes frequently map how states construct narratives to legitimize their positions by cataloguing

all the rhetorical strategies and narrative types. While these contributions are valuable for understanding discourse dynamics and reputational management, they rarely connect their findings to the practical conditions required for resolving disputes or mitigating conflict escalation. What remains underexplored is the role of treaty ambiguity in either prolonging disputes or facilitating their resolution. Without considering the substantial issues of contested treaties, crisis communication research risks documenting crises without providing insights into how competing interpretations might be reconciled or transformed into durable settlements. Addressing this problem would allow policymakers and mediators to anticipate interpretive conflicts before they escalate into political crises and to design communication strategies oriented toward genuine consensus rather than rhetorical stalemate.

Finally, scholarship rarely conducts parallel linguistic and conceptual comparisons across different versions and interpretations of the same treaty text. In multilingual agreements, subtle differences in tone or legal nuance between language versions can profoundly shape how provisions are understood and implemented, yet this issue often receives only passing acknowledgment. For example, the Minsk agreements exist in both English and Russian, each treated as an authentic version, but there is no clause-by-clause scholarly comparison to assess whether wording choices in one language might enable or constrain certain interpretations. Nor is there research explaining why no Ukrainian-language version was produced despite Ukraine being a primary signatory. Similarly, in the Sino–British Joint Declaration, British negotiators and Chinese drafters embedded fundamentally different legal traditions and constitutional assumptions into the same undefined terms, yet few studies explicitly juxtapose these divergent understandings in order to examine how the same treaty language functions differently across legal cultures. Even in UNSC Resolution 242, one of the most debated examples of treaty ambiguity, most scholarship isolates discrete lexical controversies (e.g., “the territories” versus “territories”) rather than integrating them into a broader comparative framework that explains how such divergences evolve into long-term diplomatic disputes. The

absence of parallel analysis matters because ambiguity is not just a feature of individual words but of how entire texts are read within their respective political and legal systems. Without putting these versions and interpretations into direct dialogue, scholarship risks presenting each party's understanding in isolation, as if they are self-contained narratives rather than competing claims over the same text. It also obscures how multilingual drafting itself can embed structural imbalances: who gets to define which language counts as "authentic," whose terminology shapes implementation, and whose version frames public discourse. Addressing this gap would make it possible to identify recurring patterns in how linguistic and conceptual asymmetries contribute to interpretive disputes, supporting efforts to design treaties that are less vulnerable to politicized reinterpretation and contested legitimacy.

### 3.4 Conclusion

The existing literature concerning the three case studies demonstrates an extensive academic awareness of the existence and consequence of ambiguous treaty language, and yet, the general academic approach largely describes what is happening without explaining why it is happening or how it could be fixed. This thesis seeks to address those shortcomings by treating ambiguity as an active trigger of sustained political contestation and communication crisis. The next chapter applies this approach to the analysis of each case, seeking to answer why divergent interpretations emerge, how states legitimize those interpretations, and why these dynamics so often obstruct a durable conflict resolution.

## Chapter 4 Case Analysis

This chapter will apply the interdisciplinary framework introduced from Chapter 1 to 3 to analyze how multilingual treaty ambiguity has been interpreted, contested and framed by state actors in three geopolitically and historically significant agreements: United Nations Security Council Resolution 242, the Sino-British Joint Declaration, and the Minsk Agreement. The presentation of each case will begin with an overview of the historical context in which the treaty is negotiated, the subsequent crisis that it gives rise to, and its lasting impacts on geopolitics. This is followed by a close reading of the key ambiguous terms or provisions in primary treaty text and secondary literature on treaty interpretation, drawing from the international legal doctrine and linguistic perspective. They constitute as a first layer of analysis as they identify precisely the structural and semantic sources of treaty ambiguity before turning to its communicative effect in public discourse. The second part of the analysis puts a greater emphasis on how these language ambiguities take effect in heightened political tension. Using the crisis communication framework introduced in Chapter 1, including SCCT, Image Restoration Theory, and framing analysis, as well the comparative methodology established in Chapter 2, this thesis will conduct detailed research on how state actors construct narratives around the disputed language and justify their actions by asserting authority and attributing blames on the opposing states. Together, these case studies provide empirical grounding for the thesis's central argument, that multilingual treaty ambiguity is not only a technical issue of legal reasoning and translation, but is also a communicative trigger that can destabilize diplomatic relations. The goal of this chapter is not to adjudicate which version of the interpretation should be more pervasive, but to understand how state actors assert narrative authority in treaty-related disputes from a crisis communication perspective, and to provide practical insight into the role of treaty language in shaping international conflict and crisis management.

## 4.1 UN Security Council Resolution 242

### *4.1.1 Historical Context, Drafting Process, and Lasting Impact*

To understand the dynamics revolving the resolution, it is crucial to understand the context of the Six-Day War, a conflict that drastically altered the geopolitical landscape of the Middle East. In June 1967 following a period of escalating regional tensions, Israel launched a preemptive strike against Egypt, Syria, and Jordan. It captured the West Bank and East Jerusalem from Jordan, Gaza Strip and Sinai Peninsula from Egypt, and Golan Heights from Syria in just six days, which also gave Israel direct military control over a large Palestinian population (Wilson Center, 2017). The war led to significant political consequences and humanitarian casualties, including intensified refugee crisis, a shattered promise of pan-Arab nationalism, and regional vulnerability that continued to fuel political and military conflict to this day (Avineri, 2017; Machairas, 2017). The Soviet Union first pushed for a resolution within United Nations demanding Israel's withdrawal to its prewar boundaries, while Israel wanted recognition of its existence by the Arab League and security guarantees from wars (which eventually happened again in 1973). In November 1967, the UN Security Council unanimously adopted Resolution 242, which was drafted primarily by British Ambassador Lord Caradon and the U.S. Ambassador Arthur Goldberg. The resolution was also adopted under Chapter VI of the UN Charter, which mandated peaceful dispute resolution through negotiation and recommendatory measures, instead of Chapter VII that would authorize a binding enforcement. The decision reflected the strategic approach for a broad acceptance when facing the challenge to reconcile legal constraints and geopolitical sensitivities of territorial occupation (Lapidoth, 2011). All 15 Council members voted in favor, indicating approval from both permanent and non-permanent members. Figure 1 to Figure 4 present the key phrases in all five official UN languages.

### Figure 1: Clause 1 of Article 1 of Resolution 242 in English and French

1. *Affirms* that the fulfilment of Charter principles requires the establishment of a just and lasting peace in the Middle East which should include the application of both the following principles:

- (i) Withdrawal of Israel armed forces from territories occupied in the recent conflict;
- (ii) Termination of all claims or states of belligerency and respect for and acknowledgement of the sovereignty, territorial integrity and political independence of every State in the area and their right to live in peace within secure and recognized boundaries free from threats or acts of force;

1. *Affirme* que l'accomplissement des principes de la Charte exige l'instauration d'une paix juste et durable au Moyen-Orient qui devrait comprendre l'application des deux principes suivants :

- i) Retrait des forces armées israéliennes des territoires occupés lors du récent conflit;
- ii) Cessation de toutes assertions de belligérance ou de tous états de belligérance et respect et reconnaissance de la souveraineté, de l'intégrité territoriale et de l'indépendance politique de chaque Etat de la région et de leur droit de vivre en paix à l'intérieur de frontières sûres et reconnues à l'abri de menaces ou d'actes de force;

### Figure 2: Clause 1 of Article 1 of Resolution 242 in Spanish<sup>4</sup>

- i) Retiro de las fuerzas armadas israelíes de los territorios que ocuparon durante el reciente conflicto;

### Figure 3: Clause 1 of Article 1 of Resolution 242 in Russian<sup>5</sup>

- i) вывод израильских вооруженных сил с территорий, оккупированных во время недавнего конфликта;

### Figure 4: Clause 1 of Article 1 of Resolution 242 in Chinese<sup>6</sup>

- (一) 以色列軍隊撤離其於最近衝突所佔領之領土;

The linguistic disputes centers on Clause 1 of Article 1 of the English and French version. The English version was the first original draft, and English was the primary working language of the Security Council at the time. On the other hand, French has long served as the dominant diplomatic and legal language in Arab countries due to colonial histories, and they are the key stakeholders in the

<sup>4</sup> Translation: Withdrawal of Israeli armed forces from the territories they occupied during the recent conflict.

<sup>5</sup> Translation: Withdrawal of Israeli armed forces from the territories occupied during the recent conflict.

<sup>6</sup> Translation: Israeli armed forces withdraw from the territories they occupied during the recent conflict.

Resolution. As a result, the English and French version are widely cited as the primary sources of interpretative divergence.

In its key sections, The English version calls for:

“Withdrawal of Israeli armed forces **from territories occupied** in the recent conflict;”

“...acknowledgment of the sovereignty ... of every State in the area and their right to live in peace **within secure and recognized boundaries;**”

“A just settlement of the refugee problem” (UNSC, 1967).

While in the other four versions and especially the French one:

« Retrait des forces armées israéliennes **des territoires occupés** lors du récent conflit. »

Two controversial issues arise. First, the five versions of Resolution 242 do not provide a unified understanding of the scope of Israeli withdrawal. The lack of a definite article “the” before “territories” in the English phrase “withdrawal of Israeli armed forces from territories” suggests deliberate ambiguity about how much territory Israel was expected to withdraw from after the 1967 war. This was more of an intentional, calculated omission. Lord Caradon and Arthur Goldberg both resisted pressure from particularly India, Mali and Nigeria who requested mandating full Israeli withdrawal to the pre-1967 lines, believe that such language would undermine the possibility of negotiated peace (Lapidot, 2011). The Council ultimately approved a compromise text for a smoother negotiation and political flexibility. The second issue concerns the phrase “secure and recognized boundaries,” which should also theoretically define the extent of Israel’s withdrawal. Israel maintained that the scope required further negotiations because at the time of drafting, the 1959 Armistice Demarcation lines (temporary ceasefire lines established after the 1948 Arab-Israeli War) were expressly not recognized as international boundaries, and their status as temporary lines was reaffirmed in the Armistice Agreements themselves. By calling for the establishment of “secure and recognized boundaries” rather than a simple return to “the” territories occupied, Resolution 242 was interpreted by Israel (and

the United States) as implicitly mandating territorial adjustments to be agreed upon through negotiation.

Despite the grammatical maneuver in the English version, all other versions (French, Russian, Spanish, and Chinese) lean towards full withdrawal using definite articles, participles, and classical phrasing. And yet, Chinese, Russian, and Spanish were official but not operational at the time, while the working languages of the Security Council were English and French. Resolution 242 was originally drafted and voted on in English and then translated and issued in French and other 3 languages as a procedural requirement for UN documentation. UN translators under the Secretariat conducted the translation without participating in the drafting process (Cambridge University Press, 1968), and as pointed out by legal scholar John McHugo, “des territoires occupés” was the only idiomatic choice for translating the English phrase in French for French translators (McHugo, 2001). Despite the fact that the French representative explicitly affirmed that the French text was equally authentic, no substantive comments were made from other ambassador regarding the French wording immediately after it became available in the database (De Valdés, 2017; Neff, 1994).

The lack of discussion suggests that the French version (and other languages) of the text serves only in a procedural status, and yet, despite its rapid adoption and formal unanimity, the existence of multilingual versions produced significant interpretative divergence almost immediately. Arab countries, notably Egypt and Syria, began to cite the French version in public forums such as the Arab League and UN General Assembly to demand a full Israeli withdrawal from all occupied territories in early 1970s (Neff, 1994). Israel and the U.S. responded by referring to the English text as having the operative primacy since the text was approved by the Security Council. Israeli legal advisors, predominantly Meir Rosenne, recalled that under international law, precedence is given to the original version that was drafted and adopted, and thus the English version should be considered authoritative as the French text was issued post-adoption (Rosenne, 2008). In a similar manner, U.S. representative

Joseph Sisco reiterated during a 1968 Security Council meeting that Resolution 242 does not require withdrawal “to the pre-June 5 lines,” underscoring that withdrawal was meant to be negotiated later instead of mandated in the resolution (UNSC, 1968).

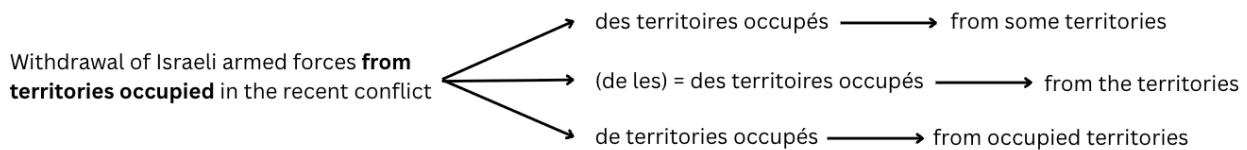
#### *4.1.2 Legal and Linguistic Foundations of Treaty Ambiguity*

The interpretative uncertainty of Resolution 242 is a result of structural and semantic properties of language itself. This subsection applies legal and linguistic theories introduced in Chapter 1 to explain how ambiguity is embedded in the resolution language, formally as a diplomatic consensus but politically as a trigger for international communication crises.

Under international law, particularly Article 33 of the Vienna Convention on the Law of Treaties, all language versions of a treaty or international resolution possess equal legal authority, and in the case of divergence, the convention mandates interpretation to be aligned with the treaty’s objective and purpose. For Resolution 242, its five language versions were all procedurally issued as official versions, yet operationally only the English version was drafted and voted on. The English version “withdrawal of Israeli armed forces from territories occupied in the recent conflict” notably omitted the definite article “the” before “territories.” But for the French version, because the French language cannot omit an article in the same way as in English, it had to be either “des territoires” (“some territories”) or “les territoires” (“the territories”). At the same time, the French version itself can also be technically a contraction of “de les territoires occupés,” meaning “from the occupied territories.” Otherwise, a more neutral translation would be “de territoires occupés.” Figure 5 illustrates all the possible versions and translations. Moreover, at the time, it was internationally acknowledged that Israel had occupied the West Bank, Gaza Strip, Golan Heights, and Sinai Peninsula. In such a context, linguistic conventions in French often allow “des territoires occupés” to be understood as referring definitively to these established areas. In other words, within this diplomatic and political context, it should be “the occupied territories” (Lapidoth, 2011). On the other hand, the Spanish, Russian, and

Chinese versions do not have any issue with how the definite article should function grammatically or contextually. Each uses a sentence structure that clearly refers to a definite set of territories occupied by the Israeli armed forces during the Six-Day War. Table 3 presents a summary of comparison across five versions.

**Figure 5: Possible Translation from English to French**



**Table 3: Comparison of Ambiguity Across Five Versions**

Language	Key Phrase	Use of Article	Ambiguity?	Notes
English	“from territories occupied...”	No article: “territories”	High ambiguity	Allows “some” vs. “all” debate
French	“des territoires occupés”	“des” = “some” or contraction of “de les”	Moderately ambiguous	Can be interpreted as “some” or “the” depending on context
Spanish	“de los territorios que ocuparon...”	“los” = definite article	No real ambiguity	Clearly means “the territories they occupied” (i.e. all known territories)
Russian	“с территорий, оккупированных во время конфликта”	“с территорий” = from the territories	No real ambiguity	Definite reference to a specific set
Chinese	“其於最近衝突所佔領之領土”	Classical structure implies specificity	No ambiguity	Clearly means “the territories they occupied” (i.e. all known territories)

This syntactic difference is also described as semiotic divergence in multilingual legal texts (Arginelli, 2015). Legal language functions as both a normative guide and a performative and constitutive act, as described by speech act theorists (Austin, 1962; Searle, 1976). A clause such as “withdrawal from territories” or “withdrawal from *the* territories” defines a legal and political parameter within which an action is understood, enacted and contested. By omitting “the,” the English version creates space for diplomatic maneuvering, which was explicitly advocated by Lord Caradon and Arthur Goldberg who were the major drafter of the resolution. And in reality, the Council members India, Mali, and Nigeria submitted the draft resolution S/8277 as an amendment include the definite article, but it was

never formally put to the membership for adoption or rejection (UNSC, 1967). S/8277 also notably included a relevant passage in the preamble that read “occupation or acquisition of territory by military conquest is inadmissible under the Charter of the United Nations,” which was adopted in the final version of Resolution 242 (Lapidoth, 2011). Moreover, as the Japanese delegate pointed out, neither of those draft texts (in reference to S/8277 and the Resolution 242) “adequately reflects a consensus of the Council” (UNSC, 1967).

Linguistically, the difference between “territories” and “des territoires” points to the challenge of translating multilingual legal documents. The French version (alongside the others) was translated post-adoption by the UN Secretariat, with no substantive participation in and access to the debate, and member states attending the Council did not raise any substantive comment on the French wording immediately after its version was issued. While all versions were equally authentic, they produced a semiotic divergence and led to productive ambiguity in which parties with conflicting interests could build a consensus in the beginning but later operationalized the language in diverse ways (Kakoullis & Malkani, 2021). From a legal-linguistic standpoint, this form of intentional ambiguity was instrumental in enabling the passage of the resolution despite opposing claims.

The concept is expanded in scholarship that argues ambiguity in diplomatic language should be tolerated and is often engineered to maintain consensus in volatile negotiations. Ambiguous provisions neutralize opposing narratives by offering each side plausible deniability or flexible interpretation (Pehar, 2001). In cases such as Resolution 242, where peace is established on shadowing the conflicting interests, small syntactic choices such as the presence of absence of an article can alter the operative meaning of an obligation and erode trust especially when states invoke different language to justify competing actions.

### *4.1.3 Crisis Communication, Framing, and Media Narratives*

The language of Resolution 242 did not remain a technical or linguistic issue; rather, as already established in the previous subsection, the resolution's contested phrasing concerning the extent of Israeli withdrawal from occupied territories has become a trigger for sustained crises in diplomacy, media discourse and political rhetoric. This section applies the crisis communication outlines introduced in Chapter 1 and 3, namely SCCT, Image Restoration Theory, and framing theory, to analyze how various stakeholders shape narratives, justify actions, and mitigate reputational risks.

The primary stakeholders in this communicative crisis were Israel and Arab states (Egypt, Syria and Jordan) who were legally and diplomatically tied to the content of Resolution 242. Their reliance on the opposing interpretations of the English/French resolution became foundational to their foreign policy and diplomatic rhetorics. Meanwhile, they also performed communicative features common to secondary stakeholders through framing strategies, media engagement and institutional lobbying. While not a formal party in the conflict, the United States also played a uniquely influential position as it was one of the drafters of the resolution and a narrative broker in the Middle Eastern geopolitics. While it was not the subjective of any operative clause of the resolution, it shaped the resolution's linguistic ambiguity and defended Israel in multilateral forums. As an architect of treaty ambiguity and advocate for one position at the same time, the U.S. fits into both primary and secondary stakeholder in the crisis communication. Other institutional actors, such as the United Nations, the Arab League, and the Non-Alignment Movement (NAM) countries, also took part in the crisis as the secondary stakeholders as they acted as discursive mediators or amplifiers for competing legal and moral narratives. The media simultaneously contributed to the contestation by selectively reinforcing or obscuring different narratives and shaping a fragmented global perception of the resolution.

### ***Pre-crisis: Strategic Positioning through Ambiguity (1967–1968)***

From the outset, the English and the French version of Resolution 242 created diverging legal obligations and strategic positioning for primary stakeholders to position themselves either as victim of misinterpretation or as legitimate defenders of the resolution's original intention. In the case of Israel, it faced criticism and reputational challenge mainly from Arab states and Non-Aligned Movement (NAM)<sup>7</sup> members such as India, Indonesia, and several African nations for allegedly violating a full withdrawal from territories captured in 1967 mandated in the resolution. Such claim portrayed Israel as an illegitimate occupier, undermining its diplomatic credibility and amplifying international opposition. In response, Israel consistently invoked the English text of the resolution and the fact that it was drafted and adopted unanimously inside the Security Council. Israeli Foreign Minister Abba Eban and legal advisors such as Meir Rosenne, publicly claimed that Israel's partial withdrawal is consistent with legal mandate in the English text (omitting "the" before "territories") (McHugo, 2001; Rosenne, 2008). This reading was consistent with the approach of Lord Caradon and Arthur Goldberg, the main drafters of the resolution, who claimed that the omission of a definite article "the" was a deliberate attempt to preserve diplomatic flexibility (Lapidot, 2011). In parallel, the French delegate also asserted that "if we refer to the French text which is equally authentic with the English, leaves no room for any ambiguity, since it speaks of withdrawal "des territoires occupés", which indisputably corresponds to the expression 'occupied territories'" (Finkelstein, 1996). This tactic aligns with a form of justification framing under SCCT and reduction of offensiveness in Image Restoration Theory: when facing blames for non-compliance, Israel and other states aligned with its interpretation minimized its perceived accountability by claiming that its interpretation of the clause was lawful and consistent with the original operative language of the resolution. In a sense, they also effectively denied the presence of ambiguity by promoting one possible reading of the phrase and

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<sup>7</sup> The Non-Aligned Movement (NAM), formed during the Cold War to avoid formal alignment with either the Western or Eastern blocs, often adopted positions supporting anti-colonial and sovereignty-based principles. NAM members such as India, Indonesia, and several African states echoed Arab calls for Israel's full withdrawal, reflecting the movement's broader emphasis on territorial integrity and opposition to occupation (*Willets, 1978*).

thereby shifted the blame of misunderstanding onto the other party, even though the linguistic features of the text suggest otherwise.

The United States openly endorsed Israel's interpretation of Resolution 242, and its reputational risk for being biased and hypocritical was equally significant. In the broader Cold War context, such a stance could also affect America's influence in the Middle East, alienate Arab allies, and jeopardize its credibility as a neutral arbiter committed to international law, as expressly stated in internal communication between U.S. senior officers and U.S. President (Rusk, 1967; Rostow, 1967). To divert reputational damage, U.S. frequently adopted blame deflection and prognostic framing by suggesting that a peaceful solution required further negotiation instead of an immediate territorial withdrawal, thus recalibrating public expectations and shift attention to broader strategic concerns (Entman, 2004; Coombs, 2007). In a 1968 Security Council session, U.S. representative Joseph Sisco explicitly stated that Resolution 242 "did not say withdrawal to the pre-June lines," insisting on a legal defense centered on the English version, which entailed more negotiation on territorial adjustment due to the flexibility of the provision (UNSC, 1968). This statement exemplified structured diplomacy, where unresolved details were deliberately left open for negotiation to continue and reach a conflict resolution, even though it was short-lived. Moreover, the strategic inclusion of ambiguous language in a treaty resonated with a broader American approach to the Middle East during the period, who largely shaped the volatile dynamics in the region with the Soviet Union. While Henry Kissinger, a prominent architect of U.S. foreign policy in the 1970s, was not directly involved in drafting Resolution 242, his *realpolitik* diplomacy exemplified the practice of constructive ambiguity and intentional vagueness as a method to managing high-stakes conflicts and deferring diplomatic stalemates (Kissinger, 1979). Applying to the context of Resolution 242 which carried two parallel legal interpretations from the outset, this approach reflected a calculated diplomatic compromise to have an immediate resolution that could publicly signal de-escalation. And

yet, it ultimately failed to even a short-term settlement precisely because it avoided clarifying key obligations.

In contrast, when referencing to the resolution, Arab states employed diagnostic and motivational framing to highlight Israel's non-compliance. Arab states interpreted the resolution as mandating full Israeli withdrawal based on the French version (which includes "des territoires occupés"). This reading was repeatedly presented in public forums such as the Arab League and UN General Assembly debates during the 1970s (Neff, 1994; McHugo, 2001). Their framing invoked the language of justice and decolonization, positioning Israel as violating the spirit and substance of the resolution and themselves as victims of a selective interpretation as well as defenders of sovereign principle. A clear example is Egyptian President Gamal Abdel Nasser's statement in July 1968, when he declared that Egypt accepted Resolution 242 only on condition of full withdrawal and rejected any interpretation suggesting partial compliance (Meital, cited in PBS 2002). He explicitly associated the absence of total withdrawal to an act of betrayal of international law and Palestinian rights, which constituted as diagnostic framing where Arab states identified deviation from the resolution as the fundamental problem and placing responsibility squarely on Israel. Similarly, during multiple General Assembly speeches throughout the early 1970s, diplomats from the Arab states advocated the Non-Aligned Movement (NAM), which called for collective measures in defense of territorial integrity (UNISPAL, 2025). They also invoked the UN Charter's principles of sovereignty and territorial integrity, and specifically Syrian and Egyptian delegates insisted that Israel's "acquisition of territory by force" was a violation of its legal obligations and moral principles that went against postcolonial sovereignty (UNGA, 1972). These statements illustrate the use of motivational framing where state actors appeal to shared values of sovereignty, decolonization and legal justice to mobilize international solidarity and reposition the Arab states as moral actors in a global narrative of resistance.

### ***Crisis: Escalation and Narrative Confrontation (1968–mid-1970s)***

By the late 1960s, crisis narratives continued and escalated into more military confrontation. After losing territories and political leverage due to their defeat in the 1967 Six-Day War, Arab governments faced international criticism for refusing to accept diplomatic frameworks and resisting peace. Notably, Syria rejected a UN envoy Gunnar Jarring's peace mission (1967) to facilitate indirect negotiations among Egypt, Jordan, Syria, and Israel on the terms of withdrawal and recognition under the vague language of Resolution 242: while Egypt and Jordan were more open to work with Jarring (albeit with specific conditions such as no direct negotiation with Israel), Syria would accept a negotiation only after Israel fully withdrew from all occupied territories, including the Golan height; it also rejected Resolution 242 itself, claiming it did not explicitly call for full withdrawal and thus giving Israel too much flexibility (United Nations, 1968; United Nations, 1971, Clead, 2007). To divert criticism and shift the responsibility entirely onto Israel, they also employed image repair and attack-accuser strategy by operationalizing their own interpretation in institutional forums and expanding narratives into the broader principle of decolonization and Palestinian representation. In multiple UN General Assembly sessions during the early 1970s, Arab representatives repeatedly cited the French version of the resolution, accused Israel of deliberately undermining the content of Resolution 242, and pushed forward more specific UN resolutions such as Resolution 2628 (1970) and Resolution 338 (1973) calling for the full implementation of Resolution 242 (United Nations, 1968). And this stance became increasingly intertwined with Palestinian representation on the international stage, since for Arab states, full Israeli withdrawal would entail recognizing Palestinian national rights and settlement of the refugee problem in addition to restoration of Arab-controlled territory. Its language served as a foundational reference in later military conflicts such as the 1973 Yom Kippur War and the 1978 Camp David Accords. Israel continued its retention in the Golan Heights and parts of the West Bank, and it justified its action by appealing to the resolution's clause on "secure and recognized boundaries," that territorial withdrawal must be conditioned by future negotiations and security needs, and not interpreted as requiring a full return to pre-1967 borders.

Meanwhile, Arab governments and Palestinian representatives continued invoking the French text in Resolution 242 in public forums to denounce Israel's continued occupation and rallied support through the reference to decolonization and legal justice. Each military move was accompanied by a rhetorical effort to define it as consistent (or inconsistent) with the resolution, exemplifying a reputation management in crisis where state actors deploy strategic use of language and framing to manage blame during politically sensitive events (Ulmer, Sellnow, and Seeger, 2007). Public institutions shape their reputational standing through both actions and storytelling; crises are thus triggered and intensified through narrative. Resolution 242 was a discursive battleground where state actors framed ambiguity not as a neutral error but as a geopolitical affront (Boin, 't Hart, and McConnell, 2009).

### ***Media as a Crisis Amplifier***

Such type of communication crisis was not confined to diplomatic exchange and military actions. As the secondary stakeholder in the crisis, the media played a decisive role in shaping how contestation over Resolution 242, alongside the broader Middle Eastern affairs, would reach the public. Most media operated as both gatekeeper and amplifier, as it selectively transmitted state-aligned narrative and failed to provide a transparent account about the treaty's multilingual feature or a historical background of the Middle Eastern conflict. For instance, Western media such as BBC and ITV overwhelmingly prioritized Israeli and U.S. perspectives while offering minimal legal-historical context about occupation or settlement expansion (Philo & Berry, 2003). And when Resolution 242 was mentioned, those media typically focused on the political consequences but rarely touched upon the legal divergence between the French and the English text. Similarly, major U.S. newspapers such as *The New York Times*, *Washington Post*, and *Chicago Tribune* routinely adopted Israeli or U.S. diplomatic language by framing the conflict as a security problem, describing Israeli military actions as defensive or passive, using criminalizing languages to label Palestinian actions (such as "militant

attacks” and “terrorism”), and downplaying voices from Arab states or Palestinian leadership (Zelizer, 2002). Such selective reporting helped naturalize one position over another, shielding the complexity of the dispute from public scrutiny and reinforcing dominant power narratives. This approach is consistent even today over issues concerning Israel and Palestine. By contrast, Arab media outlets such as Al Jazeera English/Arabic and Al Arabiya exhibited more empathy and emotional engagement when covering victims of Israeli military actions (El Ali et al., 2018; Gadzo, 2017). A 2017 Al Jazeera report, while primarily recounting the Palestinian civilian experiences during the conflict, noted that Resolution 242 “calls for Israel to withdraw from the occupied territories” and specifically framed Israeli expansion as a violation of international law (Al Jazeera English, 2017). Such contrast in reporting emphasis created distinct media ecosystems, where audience of different media outlets were exposed to different versions of the reality and narratives that were aligned either with Israel or with the Arab countries. Media also functions as an auxiliary mechanism for state actors because it selectively amplified narratives according to their national or regional strategic positions. The failure of engage in transparent discussion resulted in a competing framing regime and a polarized media environment, where audiences received highly curated realities that obscured the full legal context of the resolution.

### ***Post-crisis (mid-1970s onward)***

By the mid-1970s, the acute diplomatic confrontations over Resolution 242 had settled into a pattern of institutionalized narrative entrenchment. In SCCT terms, this stage reflects a recovery phase in which stakeholders seek to secure long-term legitimacy by embedding their interpretations into the international system. For Arab states, the post-crisis period was marked by an operationalization of their own interpretation in institutional forums and an expansion of narratives into the broader principle of decolonization and Palestinian representation. The Rabat Summit of the Arab League was held in October 1974, and 20 Arab League member states unanimously endorsed full Palestinian representation by recognizing the Palestine Liberation Organization (PLO) as the sole legitimate

representative of the Palestinian people and the Palestinian right to self-determination (Office of the Historian, 1974). This recognition carried significant legal and political consequences as it formally linked Resolution 242's withdrawal clause to the broader principle of decolonization and human rights and laid the groundwork for UNSC 338 (1973) (calling for ceasefires between Israel and the coalition of Arab states and immediate implementation of Resolution 242 "in all its parts"), UNGA Resolution 3237 (1974) (granting PLO's observer status at the United Nations), as well as UNGA Resolution 3236 (1974) (reaffirming the Palestinian people's right to self-determination and return for Palestinian refugees) (UNSC, 1973; UNGA, 1974a; UNGA, 1974b). By operationalizing these interpretations into multilateral records, the Arab states transformed from a reactive defense into a proactive reputational strategy.

For Israel, the post-crisis stage involved a consolidation of its position that Resolution 242 permitted only partial withdrawal, which was grounded in the resolution's reference to "secure and recognized boundaries." Israel's security concern remained integral to its compliance. Overtime, this interpretation became operationalized in subsequent peace frameworks. Following the Yom Kippur War, U.S. brokered the Camp David Accords (1978) between Egypt and Israel. It explicitly cited Resolution 242 as the basis for negotiation, but the withdrawal clause was more in line with Israel's conditional approach: while it agreed to return the Sinai Peninsula to Egypt, whether it would withdraw from the West Bank and Gaza would still be contingent on future negotiations. Similarly, during the Oslo process (1990s) which established mutual recognition of Israel and PLO, Resolution 242 (alongside Resolution 338) was explicitly cited as the guiding UN framework negotiations in the preamble. Nevertheless, it failed to address the core interpretative dispute over the scope of the occupied territories for Israeli withdrawal. Israel continued to insist on a partial withdrawal contingent on a broader security arrangement.

The post-crisis stage witnessed numerous diplomatic efforts from sovereign countries and institutions, and yet it never resolved the ambiguity of Resolution 242 because the two authentic language versions gave both Israel and Arab countries a valid reason to sustain their political interest. The resolution was produced out of a constructive ambiguity that facilitated initial consensus inside the United Nations, but it created a permanent political and communication crisis. Efforts to add amendments before the adoption to clarify the scope of withdrawal were consistently voted down, meaning that the Security Council members were well aware of the potential controversy, but they still pushed it through so that they could have something *on paper* to stop the escalation. The whole issue of linguistic ambiguity was not just about deliberate vagueness; it was about two equally authentic versions of the resolution that provided contradicting legal obligation. States could thus leverage the version that suited their interests the best and claimed that they were adhering to international law, but such adherence was only relative, because it was based on a contested version whose validity was itself in question. No party or UN body sought to reconcile the French text despite the knowledge of a serious bilingual contradiction, and none openly questioned the legitimacy of relying on an international document that, in a legal sense, could not produce a single, unambiguous political obligation.

## 4.2 The Sino–British Joint Declaration

### *4.2.1 Historical Context, Drafting Process, and Lasting Impact*

The Hong Kong Island (1842) and the southern part of Kowloon Peninsula (1860) was ceded in perpetuity to the United Kingdom by the Qing dynasty through a series of unequal treaties following the first and second Opium Wars. In 1898, the United Kingdom sought to fortify the defense and economy sustainability of existing colony by obtaining a 99-year lease over the New Territories (a rural area in the north of Kowloon Peninsula and surrounding 235 islands) through the Convention for the Extension of Hong Kong Territory. This arrangement enabled Britain to also entrench its territorial reach and acquire a buffer zone in the New Territories for railway links and water supply

without risking inflaming more Chinese resentment and provoking immediate international condemnation (Wesley-Smith, 1980; Tsang, 2007; The China Quarterly, 1983).

By the early 1980s, after People's Republic of China (PRC) was established under Mao Zedong and succeeded all Chinese territories, the impending expiration of the lease on New Territories was raising significant political and economic concerns. Hong Kong was the regional financial hub thanks to a British-style common law system, independent judiciary, free capital flow, open market and press freedom, and yet, its uncertain legal status after 1997 could undermine legal protections and corporate confidence since there was no clear framework for its post-1997 sovereignty (Goodstadt, 2005; Davis, 2024). On numerous public occasions, Chinese leader Deng Xiaoping repeatedly asserted that China's sovereign authority over all parts of Hong Kong was not negotiable (Wong, 2019, MFA PRC, 2024). Formal negotiations took place in March 1982, with British Prime Minister Thatcher and Governor Youde representing London, and Deng Xiaoping along with Premier Zhao Ziyang heading the Chinese side. While the British delegation proposed an extension of British administration over retained territories to protect Hong Kong's investment and legal autonomy, China insisted on full return of sovereignty and designed a governance under "One Country, Two Systems"<sup>8</sup> to avoid disrupting Hong Kong's distinct system (Tsang, 2007; Poon, 2008). Britain ultimately accepted China's position on sovereignty in early 1983 to avoid unilateral action by China and to preserve economic stability (Wei, Burnham, & Kerr, 2024; SCMP, 2014). The result was a Sino-British Joint Declaration, initialed in September and signed in December 1984 by both delegations. It was registered as a public international treaty in the UN Treaty Series (Vol. 1399, No. 23391) in June 1985, stating that from 1 July 1997 onward, Hong Kong would become a Special Administrative Region under PRC sovereignty. Among others, the Declaration outlined that Hong Kong would return to Chinese

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<sup>8</sup> "One Country, Two Systems" is a constitutional principle formulated by Deng Xiaoping in the early 1980s, allowing regions like Hong Kong and Macau to maintain their own capitalist systems, legal frameworks, and way of life for at least 50 years after reunification, despite being part of the People's Republic of China (*State Council Information Office of the People's Republic of China, 2014*).

sovereignty in 1997, and that the “One Country, Two Systems” model would last for 50 years until 2047. In specific, it guaranteed Hong Kong a “high degree of autonomy” (高度自治), the preservation of “executive, legislative and independent judicial power,” and rights and freedoms such as those of the person, of speech, of the press, of assembly, etc. in Chinese and English, both declared equally authentic under Article 33 of the Vienna Convention (UNTS, 1985; UK Parliament, 2020; Council on Foreign Relations, 2020). It did not contain any expiration date; not did it clarify what would happen to the governance of Hong Kong or the status of the Declaration after the 50-year period in 2047.

The immediate reaction to the Declaration was mixed. Surveys from the late 1980s revealed that many residents in Hong Kong doubted China’s commitment to the Declaration, especially on the “One Country, Two Systems” agreement (DeGloyer, 1997; UPI Archives, 1991). The language inside the treaty was also intentionally indeterminate, which was practical for diplomatic feasibility during the time of negotiation but paved ways for interpretative disputes and political contestation. Prominent examples of public crises, such as the 2014 Umbrella Movement and Occupy Central, emerged as a direct response to Beijing’s decision to restrict electoral reforms and judicial independence in Hongkong. Similarly, the 2019–2020 anti-extradition protests (against a Hong Kong government’s proposal allowing case-by-case extraditions of criminal suspects to mainland China), which escalated into a broader pro-democracy movement, repeatedly referenced the Declaration as evidence that Beijing was breaching its treaty obligations (Cheng, 2023). While the British government and several international institutions continued to affirm the Declaration’s binding status, Beijing shifted its portrayal especially after the 2019 National Security Law<sup>9</sup> (Tse, 2015; Overhold, 2024).

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<sup>9</sup> The Hong Kong National Security Law, adopted by China’s National People’s Congress on 30 June 2020, criminalizes secession, subversion, terrorism, and collusion with foreign forces, granting broad investigative powers and allowing mainland security organs to operate in Hong Kong.

#### 4.2.2 Legal and Linguistic Foundations of Treaty Ambiguity

Figure 6: Clause 2 of Article 3 in English

**(2) The Hong Kong Special Administrative Region will be directly under the authority of the Central People's Government of the People's Republic of China. The Hong Kong Special Administrative Region will enjoy a high degree of autonomy, except in foreign and defence affairs which are the responsibilities of the Central People's Government.**

Figure 7: Clause 2 of Article 3 in Chinese

**(二)香港特别行政区直辖于中华人民共和国中央人民政府。除外交和国防事务属中央人民政府管理外，香港特别行政区享有高度的自治权。**

The interpretative disputes over the Sino-British Joint Declaration centered on a lack of legal precision, particularly of the key phrase “a high degree of autonomy (高度自治).” Figure 6 shows the original text in English and Chinese. The Declaration took into account both China’s concern over losing sovereignty and Britain’s insistence on preserving Hong Kong’s unique system, but it did so by deliberately incorporating vague legal language that was fundamentally different without operationalizing them in real political terms. This is consistent with the idea of strategic ambiguity, which is useful in diplomacy when state parties with incompatible constitutional frameworks seek to resolve conflicts (Zartman, 1985; Kakoullis & Malkani, 2021). During the negotiations, China’s representative Deng Xiaoping introduced the principle of “One country, Two systems” and language of “a high degree of autonomy” as part of China’s broader policy vision for Hong Kong (Tsang, 2007). British negotiators accepted the term despite its open-endedness because it offered formal assurances of continuity in Hong Kong’s distinct system while avoiding detailed limitations on Beijing’s sovereign powers (Ghai, 1999). Nevertheless, from a speech act perspective, terms such as “autonomy” have a performative function as it is a political promise that defines the scale of constitutional controls or limits over a territory (Austin, 1962; Searle, 1969). In the British common-law tradition, and more

broadly within liberal democratic legal cultures, phrases such as “autonomy” and “judicial independence” imply self-governance and legal entitlements based on democratic principles (Tu, 2020). Based on its colonial constitutional structure inherited from Britain, Hong Kong already operated under the common law system with independent courts, the power to pass local laws, and discretion over external economic affairs (Ghai, 1999). And thus, a liberal constitutional reading shared among Hong Kong residents and democratic states such as the EU members states, Canada, Japan and Australia is that it would allow few interventions from Beijing and grant Hong Kong’s continued discretionary control over its legislative, executive, and judicial affairs (Chan & Lee, 2022; Council on Foreign Relations, 2020).

China’s interpretation, on the other hand, is grounded in its unitary constitutional structure and political tradition of centralized authority. The concept of “autonomy” in the Chinese legal lexicon aligns with what scholars conceptualize as semiotic divergence, where the same legal term carries divergent institutional meanings across languages due to legal-cultural asymmetry (Šarčević, 2000). Under the Regional Ethnic Autonomy Law, for example, autonomous regions such as Tibet, Xinjiang, and Inner Mongolia may enact local laws or preserve minority cultures but remain directly subject to the “unified leadership of the central government,” which is a delegation appointed by Beijing and subordinate to China’s constitutional unity of China (Law of the PRC on Regional Ethnic Autonomy, 1984/2001). This principle is reaffirmed in the 2014 State Council White Paper on “One Country, Two Systems,” which plainly states:

“... the central government exercises overall jurisdiction over the Hong Kong ... The high degree of autonomy... comes solely from the authorization by the central leadership ... There is no residual power” (State Council, 2014).

By framing autonomy as authorization without residual rights, China affirms a hierarchical understanding of the term “autonomy,” and thereby the fact that Hong Kong’s autonomy is delegated and revocable (People’s Daily, 2014). Moreover, even the guarantee of rights and freedom of speech,

assembly and so on are not absolute; according to Article 35 of the PRC Constitution, “citizens of the People's Republic of China enjoy freedom of speech, of the press, of assembly, of association, of procession and of demonstration<sup>10</sup>.” In practice, however, those rights and freedom are heavily restricted through subordinate laws and ambiguous laminations under the justification of state security, public order and social stability. This divergence reflects the challenges of multilingual treaty interpretation noted in Chapter 3: although both the English and Chinese texts of the Declaration are “equally authentic” under Article 33 of the Vienna Convention, their institutional context produces incompatible readings that later erupted into open diplomatic and political contestation.

Additionally, while much scholarly attention has been directed towards the ambiguous phrasing of “a high degree of autonomy” in the Declaration, the deeper structural issue lies in a series of unresolved legal and communicative silences embedded in the treaty. In particular, the Declaration lacks explicit terms on the post-handover legal status of Hong Kong, its temporal duration, and a unified definition of “autonomy”. The omission created space for each state actor to later advance incompatible legal interpretations as if they were self-evident, setting the stage for a communication crisis rooted not only in semantic vagueness but in divergent constitutional cultures.

#### *4.2.3 Crisis Communication, Framing, and Media Narratives*

The signing parties to the Sino-British Joint Declaration were People’s Republic of China (PRC) and the United Kingdom. But the actual individuals who drafted the Declaration and political conditions in the 1980s are different from those responding to the crisis decades later. Within PRC, Deng Xiaoping was the leader in negotiation, and the goal was to ensure a peaceful return of Hong Kong and economic reform (as the period was before China entered the World Trade Organization). In present days, the government is under the leadership of Xi Jinping and an ideological emphasis on

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<sup>10</sup> 中华人民共和国公民有言论、出版、集会、结社、游行、示威的自由。

national security and centralization. Nevertheless, the Communist Party has remained in power and represent PRC the whole time, and thus there is an institutional continuity of the Chinese governance. The United Kingdom in the 1980s was under the leadership of Magret Thatcher, and across different political parties, the Uk government has maintained the view that the Declaration remains valid. Major UK parties (Tories and Labour) have repeated the same official position and issued favorable visa policies for Hong Kong residents and criticism of alleged China's violation of the Declaration. Nevertheless, the UK has not taken any substantial diplomatic or economic step to push for compliance, mainly due to a decline in political will and influence. Recent UK governments even had little political incentive to take strong action on Hong Kong beyond symbolic gestures since its leaderships have been consumed by domestic overload, such as post-Brexit arraignment, economic struggles, immigration. Further, contemporary UK does not possess any economic or political power to force China into compliance. There is therefore a minor gap in institutional continuity inside the British governance. Despite these constraints, it remains valid to conclude that both PRC and the UK (more precisely its official spokespersons) are the primary stakeholders in this case, especially because the analytical focus of the paper lies in crisis communication, narrative framing, and discourse construction.

Additionally, the role of the Hong Kong Special Administrative Region (HKSAR) government worths a more nuanced discussion. From the stakeholder perspective, the Hong Kong government is a secondary stakeholder. The government played a visible role in administration, governance, education policies, election management, and especially crisis events. It officially enforces the Basic Law (derived from the Declaration and unilaterally formalized by PRC in 1990), Public Order Ordinance (a colonial-era law), Legal Code, and National Security Law (imposed by PRC without the HKSAR legislative process in June 2020). And yet, the Hong Kong government is not sovereign or an independent body representing Hong Kong. Its authority is delegated by PRC, and all the administrative and political decisions came from Beijing. In parallel, Hong Kong's civil society is

also a visible secondary stakeholder, as its grassroots mobilization and public campaign are challenged Beijing's official narratives and seeking to reframe the Declaration as a living and legal basis for Hong Kong's substantial autonomy.

While the state model within crisis communication is useful to present many crisis events in a clear linear sequence, the study of the Sino-British Joint Declaration will not follow this model because it represents a prolonged discursive rhetorical battle and unresolved legal ambiguity with little direct military escalation between primary state actors. A stage-based model would thus risk segmenting an event that can be understood better as an ongoing communication crisis, in which legal, political, and symbolic narratives continue to resurface without closure. This section will thus adopt an actor-centered approach which accounts for a more coherent crisis communication analysis and represents more effectively the dominant role of state governments in prolonging the crisis.

The Sino-British Joint Declaration triggered a communication crisis centered on the interpretation and authority of the Declaration, especially around its central phrase "a high degree of autonomy." Both parties agreed to the inclusion of this term phrase, which was subject to divergent interpretations based on their distinct constitutional traditions. China's practice of autonomy is delegated and revocable, as instance can be found in its internal ethnic-autonomous regions in Tibet and Xinjiang that have no residual power and are subordinate to a unified leadership appointed by Beijing (State Council, 2014). In contrast, within Britain's liberal-democratic and common-law framework, autonomy implied legal entitlement to full independent governance, courts, and civil liberties, free from central intervention. This perspective aligns with other states actors, including Canada, Japan, the EU member states, that views the Declaration as safeguarding institutional protections for the autonomous governance in Hong Kong (Chan & Lee, 2022; Council on Foreign Relations, 2020).

This distinction in definitional interpretation of the treaty did not remain an abstract legal debate but became part of their crisis communication strategy. Both sides engaged in image restoration, denial, framing constructed different narratives through framing, denial, moral condemnation and symbolic mobilization based on their perceived responsibility to defend their positions and manage reputational risk. Beijing systematically denied the ongoing relevance of the Declaration. According to Beijing. The Declaration's purpose was fulfilled in 1997, when the sovereignty over Hong Kong was transferred back to PRC. The governance over Hong Kong thus became a domestic matter based on the Chinese Constitution and the Basic Law. This standpoint was specifically reflected at the 20<sup>th</sup> anniversary of the Hong Kong handover in June 2017, when Chinese Foreign Ministry Spokesperson Lu Kang stated:

“Now that Hong Kong has returned to the motherland's embrace for 20 years, the Sino-British Joint Declaration, as a historical document, no longer has any practical significance, and it is not at all binding for the central government's management over Hong Kong. Britain has no sovereignty, no governing power and no supervising power over Hong Kong” (Reuter, 2017).

This is classical strategy of denial and diminishing responsibility under SCCT as China reframed the treaty as obsolete and non-binding and rejected its legal responsibility derived from the treaty. This narrative echoed with the official 2014 State Council White Paper, which codified autonomy as “solely from the authorization by the central leadership” (State Council, 2014). Together, these official framings function as diagnostic framing as China denied the legality of the Declaration and attempted to legitimize its centralized sovereignty over Hong Kong, pushing back against external interpretations of autonomy.

In contrast, Britain's narrative relied on denial and corrective action through explicit rejection of China's claim in public statements. It also affirmed the Declaration's continued legal validity and Beijing's legal obligation to allow Hong Kong to exercise institutional autonomy. In immediate response to Lu Kang's claim that the Declaration no longer possessed practical significance, the UK Foreign Office issued a statement reinforcing its legal obligation:

“The Sino-British Joint Declaration remains as valid today as it did when it was signed ... It is a legally binding treaty, registered with the UN and continues to be in force ... the UK government is committed to monitoring its implementation closely” (Reuters, 2017).

This direct statement from the Foreign Office reflects a diagnostic framing, where the UK rejects China’s claim that the Declaration lacks a binding force and stresses its obligation to uphold the treaty. Moreover, when Beijing enacted the National Security Law in 2020, Foreign Secretary Dominic Raab made an escalatory statement, which is a clear attack-accuser strategy that called out deliberate violations of treaty-protected autonomy:

“It constitutes a clear violation of the autonomy of Hong Kong ... it is a clear and serious violation of the Joint Declaration treaty” (Reuters, 2020).

This attack-the-accuser framing repositions China not as sovereign authority but as contractual violator, calling for normative support for treaty obligations and international sentiment. Britain’s assertion that the National Security Law directly violated the high degree of autonomy of Hong Kong presupposes that such autonomy was concrete and legally protected, not contingent on the central government’s discretion. This interpretation reflects a liberal-common law framework in which autonomy implies institutional entitlements to judicial independence, legislative authority, and civil liberties, all underwritten by a binding international treaty.

While government officials in PRC and the UK both issued statements asserting the (in)validity of the Declaration, their official discourse notably omits the legal rationale for such claims, instead presenting their conclusions as self-evident. China’s assertion that the treaty is a historical document with no practical significance is not derived from formal legal mechanisms such as treaty expiry, mutual withdrawal, or abrogation; rather, they were expressed with a tacit premise that the 1997 handover of Hong Kong marked the full execution of the treaty’s obligation, thereby extinguishing any ongoing legal obligations tied to the treaty clause. According to China, Hong Kong should be part of a domestic political arrangement rooted in “One Country, Two Systems,” a model where

autonomy is a revocable delegation of sovereignty, a privilege granted to Hong Kong and ultimately reserved by Beijing under its constitutional framework. Such premise was never codified in the Declaration itself, nor was it communicated or clarified during the negotiation process. In effect, there was no formal clause or interpretative consensus on the legal status of the treaty after the handover. Both sides left unresolved the core question of temporal legal durability, allowing each to later construct a narrative aligned with their own constitutional worldview. This fundamental silence created a latent vulnerability in the treaty's communicative structure, one that escalated into a crisis when both parties began advancing incompatible legal interpretations as self-evident truths in international public discourse. While China continues to promote the principle of "One Country, Two Systems," it no longer treats the arrangement as a binding obligation derived from the Declaration. Instead, Beijing contextualized Hong Kong's autonomy as a constitutional concession granted through the Basic Law rather than as an enduring treaty-based commitment. As such, even though the Basic Law nominally promise Hong Kong's autonomy until 2047, China positioned this timeline as an internal constitutional arrangement.

From a crisis communication perspective, two structural failures underline the dispute surrounding the Declaration, both of which directly contribute to the escalation of public contestation and civil unrest in Hong Kong. First, the silence on a clear post-handover legal framework functioned as a pre-crisis ambiguity. This ambiguity remained latent in texts until both actors began to resort to strategic framing and assert mutually incompatible claims about the treaty's status. China's framing retroactively constructed the treaty as time-limited whose validity expired after the 1997 handover, while Britain framed it as structurally binding legal commitment with continuing obligations under international law. In both cases, official statements presupposed the validity of their own interpretations instead of engaging in a shared process of legal reasoning. Such failure for state actors to reconcile their differences converted a textual legal issue into an active political crisis. Second, the official discourse from China and Britain reveals a communicative collapse due an absence of explicit

legal reasoning. Instead of drawing explicitly on international treaty law or articulating their respective interpretative premises, both sides relied on a discursive authority grounded in their own legal cultures. China viewed autonomy as a revocable delegation of sovereignty, a privilege granted to Hong Kong but ultimately reserved by Beijing under its constitutional framework. Britain and other Western liberal democratic countries interpreted the Declaration as a binding commitment that protects autonomy in institutional terms: judicial independence, legislative authority, freedom of elections, and civil rights that are free of interference from Beijing. These are fundamentally different institutional understandings of a legal term, and yet neither side explained these underlying premises in the treaty text or in subsequent official communication. They also assumed that audiences would intuitively align with their respective legal-cultural logics.

Drawing on framing theory, it becomes clear that both China and the United Kingdom grounded their legitimacy claims not in transparent legal reasoning but in cultural and constitutional narratives. These narratives acted as symbolic framing that precluded open debate. By framing the Declaration either as expired (PRC) or persistently binding (UK), both sides treated their narratives as settled facts, replacing a shared legal dialogue with competing positions to assert a narrative dominance. From the SCCT perspective, the absence of legal reasoning in official discourse undermined perceptions of responsibility and transparency, making it more difficult for either state actor to claim legitimacy in the eyes of neutral international observers. It eroded the very procedural foundations necessary for mutual recognition and dispute resolution. Consequently, what began as a legal disagreement over the substance of autonomy evolved into a full-scale communication crisis with geopolitical ramifications. It exposed an absence of cooperation between state actors and even a possible intentional choice to leave key terms undefined. Instead of offering explanations that could foster a shared understanding, both sides responded to the dispute by repeating their entrenched position, transforming a potentially solvable legal question into a prolonged communication crisis.

Civil society organizations and protest movements in Hong Kong seized upon this interpretative dispute to recontextualize the treaty language as a democratic mandate and propagate their messaging through symbolic and motivational framing. Human Rights Watch has documented how the protests in Hong Kong frequently invoked treaty-derived legal rights, such as judicial independence and civil liberties, which should be guaranteed under the Sino-British Joint Declaration and incorporated into Hong Kong's Basic Law and Bill of Rights (Human Rights Watch, 2021). They thus adopted Britain's liberal-democratic understanding of the term "autonomy" as granting concrete democratic rights. Slogans such as "Defend the Joint Declaration" appeared on banners and publications in popular international newspaper, including *The New York Times*, *Le Monde*, *Japan Times*, and *Süddeutsche Zeitung*, as a demand for PRC to uphold its legally conferred autonomy (Creery, 2019). During major demonstrations in November and December 2014, protests groups gathered outside the UK Consulate and displayed signs reading "中国违约在先, 英国追数有理" ("China broke the treaty first, the UK has rightful cause to pursue accountability") (Lim, 2014). The invocation of the term "违约" (breach of contract) explicitly framed the dispute as a treaty breach by the PRC. These symbolic and motivational framings aligned with SCCT's attack-the-accuser and corrective action strategies, as protesters placed reputational pressure on both countries to fulfill their perceived moral and legal obligations under the treaty. Other protest slogans, such as "liberate Hong Kong, revolution of our time," also treated the Declaration as a foundation for democratic values and full-scale autonomy (Freedom House, 2025). This illustrates how crisis-induced ambiguity allowed grassroots actors to reconstruct the Declaration as a symbolic anchor for democratic resistance and to rally both local and international support through emotionally resonant, treaty-centered appeals. Thus, this symbolic reactivation of the Declaration by civil society illustrates how legal ambiguity can serve as a platform for competing narratives of legitimacy, especially during sustained communication crises.

Media environment amplified the communication crisis by shaping what events and narratives reached the public, especially relating to the protests happening in Hong Kong. In mainland China,

state-controlled news outlets such as *Xinhuanet* and *People's Daily* presented overwhelmingly positive coverage of Hong Kong's return to the "motherland" while ignoring the anti-Beijing protests in Hong Kong. They also made efforts to show off the optimistic opinions of some Hong Kongers and reframed foreign accusations and demonstrations as disruptions of economic stability and results of foreign intervention (Kitt, 2017; Du, Zhu, & Yang, 2018). The framing effectively disregarded the core messaging from protestors that demanded democratic governance and respect for the Sino-British Joint Declaration from PRC. It also limited public exposure to Hong Kong's rights-related grievance and reinforced a domestic Beijing's narrative about its sovereignty. By contrast, Anglo-American media provided sustained and detailed coverage of the protests in Hong Kong, portraying protestors as civic participants and the protests as part of a wider struggle for autonomy, and democratic rights (Hou & Peng, 2023). It also emphasized the "authoritarian nature" of the 2020 National Security Law and its severe constraints on civil liberty and judicial independence previously guaranteed under the Basic Law. These contrasting media ecosystems entrenched the communication crisis and an interpretative polarization, since the audience within each media sphere consumed fundamentally different narratives about the status of the Declaration and Hong Kong.

The crisis surrounding the Sino-British Joint Declaration remains open-ended because both PRC and the British government present their competing narratives in parallel rather than in direct dialogue. It is not the result of a failed implementation, but an outcome structurally inherent inside the Declaration's original language. Since the handover in 1997, diplomatic statements and third-party reports have only functioned as reaffirmations of their respective interpretations. This lack of meaningful bilateral renegotiation, coupled with the initial reluctance in addressing the key legal ambiguities inside the Declaration, suggests that the crisis has evolved into a discursive deadlock without a definitive post-crisis stage. It reflected a calculated, or at best negligent, failure by both high-level politicians from the UK and the PRC to foresee different legal interpretations and political expectations of highly sensitive concepts such as "autonomy." Negotiating parties unquestionably

have their own interests, assumptions, and doctrines to uphold, and whether due to miscalculation or constructive ambiguity, each party mobilize the same term to defend its unilateral position based on its own legal-cultural tradition. Such a setup undermines the very premise of post-crisis learning and accountability embedded in traditional crisis communication models. There is no forum for mutual clarification, no agreed-upon arbitration, and no institutional pathway toward interpretive convergence. What remains is a treaty suspended in contested meanings, repeatedly invoked but never reconciled, a crisis both legally frozen and politically alive

## 4.3 The Minsk Agreements

### *4.3.1 Historical Background, Negotiation, and Lasting Impact*

The Minsk Agreements were a series of international agreements sought to end the war between armed pro-Russian paramilitaries and Armed Forces of Ukraine in the Donbas region of eastern Ukraine. Following Russia's annexation of Crimea in March 2014, pro-Russian separatists of the Donetsk People's Republic (DPR) and the Luhansk People's Republic (LPR) seized Ukrainian government buildings in the Donbas in April, prompting the Ukrainian military to launch its anti-terrorist operation against them. The Minsk process began in September 2014 as armed conflict between Ukrainian forces and Russian-backed separatists in Donetsk and Luhansk intensified following Russia's annexation of Crimea. After failing to capture the city of Ilovaisk from pro-Russian insurgents affiliated with DPR and detachments of the Russian Armed Forces in August 2014, Ukraine suffered from a heavy loss in the battle of Ilovaisk. At the height of the fighting, Petro Oleksijovyč Porošenko (Ukrainian president at the time) and Vladimir Putin (Russian president) met in Minsk, along with other representatives. Ukraine, Russia, and the OSCE (the Trilateral Contact Group) began the ceasefire negotiations under the mediation of France and Germany (the Normandy Format) (Allan, 2020). The result was Minsk I (5 September 2014): a 12-point ceasefire protocol calling for prisoner exchanges, withdrawal of heavy weapons, humanitarian access, and local elections under Ukrainian law. But the attempted ceasefire did not hold. In January 2015, Russian

militias launched an offensive to seize the Donetsk Airport and an important railroad hub in Debaltseve connecting Luhansk and Donetsk. As the offensive escalated, Moscow and its proxies called for the revision of the Minsk Protocol. With Ukrainian forces under growing pressure in Debaltseve, Poroshenko agreed to a second ceasefire agreement on 12 February 2015, which is the 2015 package of measures for the implementation of the Minsk Agreements (Minsk II) (Soldatenki, 2025). Endorsed by the UNSC Resolution 2202 with a unanimous adoption on 17 February 2015, Minsk II reinforced the ceasefire, established designated withdrawal zones, mandated OSCE monitoring, and outlined political steps such as local elections and constitutional reforms granting “special status” to Donetsk and Luhansk, which later became the focal point of contestation (OSCE, 2015, UNSC 2015). Nevertheless, despite formal recognition, both Minsk I and Minsk II were signed as political agreements by Ukraine’s representative Leonid Kuchma, Russia’s ambassador Zurabov, the OSCE’s Swiss diplomat Heidi Tagliavini, and self-declared leaders of Donetsk and Luhansk. They were not signed or ratified by any constitutional treaty-making authorities (e.g., heads of state or foreign ministers) (Kateryna, 2025; Åtland, 2024). This reflected a strategic approach as it allowed Ukraine to engage separatist actors without granting them legal legitimacy and undermining its position that it is dealing with Russian aggression, not an internal civil war. It also reinforced Russia’s standpoint that it was a neutral mediator of the conflict. In this light, compliance with Minsk was understood as a political choice tied to reputational cost, not a legal obligation secured through domestic legislative validation.

The ceasefire collapsed almost immediately after the signing of agreements. Although the agreements provided a specific timeline for implementation (mostly within 120 days), no one of the deadlines were fully respected. The OSCE Special Monitoring Mission (SMM) documented thousands of ceasefire breaches in Donetsk and Luhansk, including use of prohibited weapons, movement restrictions, and attacks on civilian infrastructure (OSCE Special Monitoring Mission to Ukraine, 2022a). It also noted repeated violations in designated disengagement zones and confirmed that its

patrols (especially unmanned aerial vehicles) were often targeted or obstructed, undermining monitoring efforts (OSCE Special Monitoring Mission to Ukraine, 2022b). Moreover, the practical implementation of the agreements was stalled due to two major issues: the unclear sequencing of elections and constitutional reforms, and the true implication of the term “special status”. Kyiv insisted no political reforms or elections in Donbas could occur without full border control and verified withdrawal of foreign troops. Russia and the separatist leadership took the opposite stance, maintaining that Ukraine must first adopt constitutional amendments and facilitate local elections before addressing border issues (Allan, 2020a; Allan 2020b).

A less discussed but revealing aspect of the Minsk process concerns its language. Both Minsk I and Minsk II were drafted and signed exclusively in Russian. While unofficial English translations were circulated by the OSCE, no other authenticated multilingual versions were produced by the OSCE, the Trilateral Contact Group, or the Normandy Format states (OSCE, 2015). This absence reflects both the pragmatic linguistic condition of the negotiations where Russian served as a *lingua franca* and the structural asymmetry in which Ukraine had to implement an international agreement that did not formally exist in its own official legal language. It also caused a significant issue for legal and symbolic reason. Legally within Ukrainian law, Ukrainian is the sole official state language. For an international agreement to be implemented and have force within Ukraine's domestic legal system, an official, authenticated text in the Ukrainian language is constitutionally required. Symbolically, especially after the 2014 annexation of Crimea and the start of the war, the Ukrainian language became a powerful symbol of national identity and sovereignty. Forcing Ukraine to negotiate and sign a crucial agreement in the language of the state it accused of aggression was seen as a humiliation and an assertion of Russian dominance. This undermined the political legitimacy of the agreements within Ukraine, making it extremely difficult for President Poroshenko to build the necessary domestic support.

By 2022, the framework of the Minsk Agreements had largely collapsed. In February 2022, Russian President Putin declared that Minsk II no longer existed (United Nations, 2024). Russia also launched a large-scale military operation in Ukraine, which Kyiv and its Western allies described as a full-scale invasion. Moscow, however, referred to it as a “special military operation” aimed at protecting Russian-speaking populations and enforcing security guarantees (Reuters, 2021; Reuters, 2022b). In the years that followed, ceasefire violations, drone strikes, and cross-border shelling continued across frontlines, particularly in contested zones such as Bakhmut, Avdiivka, and Zaporizhzhia. The new American administration under Donald Trump has signaled its intention to use its leverage to push for a new negotiated settlement (Soldatenko, 2025). And yet, fighting along the main front lines still continued without interruption.

#### *4.3.2 Legal and Linguistic Interpretation*

The legal and linguistic construction of the Minsk Agreement has played a central role in leading to the diplomatic and communicative breakdown. Although major powers involved in the Normandy Format consistently cited the agreements in diplomatic exchanges and agreed on the necessity of their full implementation (Jozwiak, 2017), the Minsk Agreements do not qualify as treaties in the formal legal sense under the Vienna Convention on the Law of Treaties. A treaty, according to Article 2 of the VCLT, must be concluded between states in written form and governed by international law. The Minsk texts, however, were not signed by heads of state or ratified by any national parliaments because they were designed as political ceasefire frameworks negotiated under urgent wartime conditions, not as a formal treaty under international law. As clarified in the historical context of the agreements, despite the presence of two presidents from Ukraine and Russia, the agreements were signed by representatives including former Ukrainian president Leonid Kuchma, Russian ambassador Mikhail Zurabov, OSCE official (Swiss diplomat Heidi Tagliavini), and leaders of the self-proclaimed Donetsk and Luhansk People’s Republics without subsequent ratification by national legislatures. Such arrangement reflected a diplomatic balancing act, since Ukraine did not want to grant

international recognition to the separatist authorities, and Russia officially denied being a party to the conflict (Dumoulin, 2024; Ulfax, 2024). As such, they function more as politically binding instruments than legally binding treaties. As outlined in Chapter 1, when a legal instrument is political binding, it means that states or actors have only made commitments that carry diplomatic or symbolic weight (Goldman, 2012; Chinkin, 1989). And crucially, this means the Minsk Agreements lacked any enforcement mechanism beyond OSCE monitoring. Nevertheless, despite lacking the procedural and institutional formality of treaties, the Minsk Agreements had significant political implications. They were endorsed by the UN Security Council through Resolution 2202 (2015), which granted them international legitimacy and called for “all parties to fully implement the ‘Package of measures’” (UNSC, 2015). In this sense, the Minsk texts functioned as instruments of soft law that were not legally binding under international law but instead exert normative influence and guide political behavior in conflict settings (Chinkin, 2000). Nevertheless, legally binding provisions may be less useful in this case since the issue and the effective response are not yet clearly identified: the parties of the agreements did not even agree on the fundamental nature of the conflict as an “internal Ukrainian crisis” or an act of Russian aggression. And the deadlock over sequencing (security first vs. political steps first) shows that there was no agreed-upon solution or path forward.

Although the Minsk Agreements are not formal treaties subject to the Vienna Convention on the Law of Treaties (VCLT), Article 33 of VCLT remains a useful interpretive reference. In practice, international courts and arbitration panels frequently draw on Article 33 when facing multilingual treaty discrepancies, even when addressing disputes involving informal agreements in the absence of UN-registered treaty status (Legum & Crevon-Tarassova, 2021)<sup>11</sup>. Applying this rationale to the

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<sup>11</sup> For example, in the *LaGrand* case (Germany v. United States), the International Court of Justice applied Article 33(4) to reconcile divergent English and French texts of its own Statute by appeal to object and purpose (*ICJ, 2001*). Similarly, the WTO Appellate Body has applied Article 33 to multilingual trade agreements, such as in *EC–Bed Linen (India)*, where it reconciled interpretive conflicts among English, French, and Spanish versions of the Agreement on Agriculture (*WTO, 2001*). In investor–state arbitration, Article 33 was invoked in cases involving linguistic divergence under the Turkey–Turkmenistan BIT, despite the informal character of the dispute resolution framework (*Legum & Crevon-Tarassova, 2021*).

Minsk case, the use of Russian as the sole language of negotiation and drafting created practical asymmetries in interpretation. While not legally required to be treated as “equally authoritative,” the repeated invocation of both versions by state actors mirrored the expectations often associated with multilingual treaty interpretation (Jozwiak, 2017). While unofficial English translations were circulated, no authenticated Ukrainian-language version was ever issued by the OSCE, the Trilateral Contact Group, or the Normandy Format parties. Notably, even the separatist administrations in Donetsk and Luhansk did not publish official Ukrainian-language versions of the Minsk Agreements (Alexeev, 2017). This absence placed Ukraine in the awkward position of implementing political norms in its domestic legal system without a corresponding document in its constitutional language. This language gap matters because Ukraine places strong legal emphasis on its state language. Under *Article 10 of the 1996 Constitution* and reinforced by the *Law on Supporting the Functioning of the Ukrainian Language (2019)*, the Ukrainian language must be used in all legal and governmental contexts, including international treaties and documents that require domestic implementation (Venice Commission, 2019; ILO, 2024). This means that circulating the Minsk texts only in English and Russian was inconsistent with Ukrainian legal norms, creating a legitimacy deficit for the provisions to be recognized domestically. Furthermore, the language gap facilitated strategic ambiguity by excluding broader Ukrainian public from engaging with the precise wording of key stipulations, such as “special status” or the sequencing of reforms and elections. From a critical discourse analysis perspective, the absence of a nation’s official language in an international agreement disempowers domestic interpretive agents (such as courts and the parliament) from participating effectively in constitutional debate (Fairclough, 1995). Without a text that can be accurately scrutinized, public understanding suffers, and political accountability weakens. Ukraine was effectively required to operationalize ambiguous legal provisions in a language foreign to its domestic republic, diminishing constitutional oversight and reinforcing external leverage in political narratives.

The first instance of ambiguity within the Minsk Agreements is the use of legal terms “special status (особый статус/особливий статус),” “local self-government,” and “constitutional reform” which were not clearly defined based on the geopolitical context. Multilingual legal drafting often contains a constructive ambiguity since key legal concepts can carry various semantic structures and legal traditions in different participating states (Zartman, 1985; Kuner, 1991; Broglio and Ortino, 2024). Russia interpreted “special status” as institutional autonomy granted to separatist-held regions. It also argued that political arrangements (e.g. special status and elections) should come before Ukraine regains control of its border. For instance, following the signing of Minsk I in September 2014, Alexander Zakharchenko, then leader of the DPR, announced plans to hold local elections on a “temporary self-rule status” because Minsk agreements as providing a legal basis for autonomous local governance (Interfax-Ukraine, 2015). Furthermore, Russian Ministry of Foreign Affairs statements emphasized that Minsk II “clearly require[s] a permanent special status for Donbass and decentralization of powers” (Ministry of Foreign Affairs of the Russian Federation, 2015b). By contrast, Ukraine consistently rejected any unlimited autonomy and proposal of a federalized model that would grant veto power for the separatist-held regions (Niland, 2016). In a February 2022 interview, Foreign Minister Dmytro Kuleba said emphatically: “None of Ukraine’s regions will have a right to veto the state’s decisions... Therefore, no special status as Russia is considering it... no veto right will be given” (RFE/RL, 2022). He clarified that security measures (ceasefire, withdrawal of foreign forces, restoration of border control) must come before any political arrangement. This stance aligned with Ukraine’s legislative response to Minsk II, specifically the March 17, 2015 amendments to the Law on the Special Order of Local Self-Government in Certain Areas of Donetsk and Luhansk Regions (Law No. 256-VIII). These amendments made the granting of any “special status” conditional on the completion of local elections conducted in accordance with Ukrainian law and under OSCE monitoring, as well as on the restoration of security in the region (Verkhovna Rada of Ukraine, 2015). The contrasting interpretations from Russia and Ukraine reflect a broader cultural-legal divergence. Russia’s semi-federal model has historically linked decentralization to substantive,

often permanent, autonomy for its regions, such as in the Republic of Chechnya. By contrast, Ukraine's constitutional order is firmly unitary, emphasizing the supremacy of central institutions and allowing only limited forms of local self-government; concessions were restricted to exceptional, reversible conditions facilitate administrative efficiency rather than confer entrenched political autonomy. This is evident in the Autonomous Republic of Crimea before 2012, where Ukraine it grants a narrow autonomy over cultural and economic matters but without independent security, foreign policy, or veto power over national decisions. These significant legal and cultural divergence over legal terms added to the ambiguity of the texts and posed significant barriers to their implementation.

The other major point of contention in the Minsk II is sequencing of obligations. On the surface, the text appears to set out a clear order, stating (in the English version archived by UNIAN and UN Peacemaker):

“9. **Restoration of full control** over the state border of Ukraine by Ukraine's government throughout the whole conflict area, which should begin on the first day after the **local elections** and be completed after a **comprehensive political settlement** (local elections in individual areas of the Donetsk and Luhansk regions on the basis of the Law of Ukraine, and a constitutional reform) by the end of 2015, **on condition of** implementation of paragraph 11 with consultations and in agreement with the representatives of individual areas of the Donetsk and Luhansk regions in the framework of the Trilateral Contact Group” (OSCE, 2015, Article 9)

“11. Conducting **constitutional reform** in Ukraine, with the new constitution coming into force by the end of 2015, providing for **decentralization** as a key element (taking into account the characteristics of individual areas of the Donetsk and Luhansk regions, agreed with representatives of these areas), as well as the **adoption of the permanent legislation**

on the special status of individual areas of the Donetsk and Luhansk regions in accordance with the measures specified in Note [1]<sup>12</sup>, until the end of 2015” (OSCE, 2015, Article 11)

From a strictly textual perspective, Ukraine’s restoration of border control should follow two prior steps: (1) holding local elections in separatist-held areas, and (2) implementing constitutional reform that grants permanent special status. The sequencing is therefore widely interpreted as placing political steps before security measures, and Russia consistently invoked this structure to argue that Ukraine was legally obliged to deliver political concessions before regaining control of its borders (Allan, 2020a; Dumoulin, 2024). A 2024 Epicenter analysis further noted that Russian officials framed this sequence as consistent with post-Soviet federal models, where regional elections and constitutional guarantees were prerequisites for institutional integration (Podwirska, 2024). Ukraine, however, argued that this sequence is impractical because Articles 4 and 12 also required elections to be held “in accordance with Ukrainian law” and “subject to OSCE monitoring and in compliance with OSCE standards” (OSCE, 2015). In its view, ensuring withdrawal of illegal armed groups and the restoration of basic security were necessary preconditions for any legitimate political process; otherwise, the sequence would give Russia and its proxies effective veto power over Ukraine’s sovereignty (Koshiw, 2022; Niland, 2016). This divergence illustrates how the Minsk II text, while seemingly chronological, left critical terms undefined: what counts as a “comprehensive political settlement” for areas of the Donetsk and Luhansk, when local elections can be considered legitimate, and how “agreement with representatives” should take place.

The fact that Russian and Ukraine could derive such contradictory interpretations from the same articles reflects a deeper structural problem rooted in the legal-linguistic drafting of Minsk II. Article 9 links restoration of border control to the occurrence of local elections and to a “comprehensive

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<sup>12</sup> “Exemption from punishment, harassment and discrimination of persons associated with the events that took place in individual areas of the Donetsk and Luhansk regions;”

political settlement,” but makes this conditional on the implementation of Article 11, which requires constitutional reform and permanent special status. In both the English and Russian texts, the critical conditional clause “при условии выполнения пункта 11” (“provided that paragraph 11 has been implemented”) is syntactically detached, leaving it unclear whether the condition applies only to the final stage of border restoration or also to the commencement “on the first day after the local elections.” The absence of explicit subordination or sequencing markers, combined with future-oriented and passive phrasing (“shall restore,” “shall be held,” “conditional on”), created space for diverging interpretations: Russia’s “politics-first” reading versus Ukraine’s “security-first” approach. Such drafting choices exemplify what treaty scholars describe as “constructive ambiguity,” a negotiation technique where key provisions are deliberately left open-ended to secure short-term consensus, with meaning deferred to future political context rather than fixed legal definitions (Kuner, 1991; Broglio & Ortino, 2024). In the absence of an authoritative interpreter or enforcement body, this ambiguity became a tool of political leverage, allowing each party to promote its own strategic narrative. Rather than reducing conflict, the linguistic indeterminacy amplified it by hard-wiring incompatible assumptions into the text itself, allowing both parties to adopt politically strategic readings of the text, and to exploiting gaps in language and procedure to defend their positions.

**Table 4: Summary of Main Interpretative Issues and Sources in Minsk II**

Step (text order)	Provision (article)	Plain meaning of the text	Main interpretive issues
1	Art. 9 (first clause)	Hold local elections in the “individual areas” of Donetsk & Luhansk	1) Must be “in accordance with Ukrainian law” & “OSCE standards” (Arts 4 & 12); 2) No timetable for withdrawal of foreign/illegal forces before elections
2	Art. 11	Adopt & enact a constitutional reform by end-2015, providing “decentralization” and “permanent legislation on special status” for Donetsk & Luhansk	1) Content of “special status” undefined; 2) No procedure for resolving lack of agreement with separatist representatives
3	Art. 9 (second clause)	Restore full control of the state border to Ukraine, starting the day after local elections and completing after a “comprehensive political settlement”	1) Meaning of “comprehensive settlement” unclear; 2) Border control explicitly made conditional on Steps 1–2
4 (implicit)	Arts 4, 10, 12	Preconditions for elections: OSCE monitoring, security guarantees, withdrawal of illegal armed groups	Text does not specify how or when these conditions must be satisfied relative to Steps 1–3
5 (structural)	Preamble / overall context	Trilateral Contact Group to agree modalities with “representatives of certain areas”	1) No clear mechanism if negotiations fail; 2) scope of their veto power ambiguous

### 4.3.3. Crisis Communication, Framing, and Media Narratives

The stakeholder theory reveals a multilayers set of actors related to the Minsk Agreements. The signatories and central parties with decision-making authority are the primary stakeholders. This includes Ukraine, who is a directly party to the conflict and signatory of Minsk I and II, and Russia who is also a signatory and de factor supporter of the separatists in DPR and LPR (whom Ukraine demonstratively refuses to directly engage with due to sovereign concern and domestic political cost). Secondary stakeholders are also essential to the mediation and implementation of the agreements, although they lack formal decision-making power and enforcement authority in the process. They are the OSCE (observe and monitor of the implementation), France and Germany (Normandy Format mediators), separatist forces in DPR and LPR (*de facto* actors but not recognized by Ukraine), international community such as EU, NATO and USA that provides material support to Ukraine, and media (especially the state-aligned media that enhanced state narratives).

From a staged crisis model perspective, this section primarily focuses on the during-crisis stage as conflicting narratives and communication crisis become most visible in this phase. This stage is the most critical because it reveals a lack of political will to engage in any meaningful renegotiation or clarification of obligations by both state actors. Moreover, the agreements have never been officially revoked or declared void, but there is no implementation or follow-up renegotiations for clarifying the well-known ambiguities inside the text. The Minsk process is discursive loop where there is never a clear distinction between crisis and post-crisis, since state actors continuously refer to the same ambiguous provisions to claim compliance and assign blame. Both Russia and Ukraine, along with external actors, sustain the illusion of adherence while avoiding structural reforms or renegotiation that would require concession. The result is a chronic crisis where ambiguity is repurposed to justify ongoing inaction or escalation.

As established from the legal and linguistic perspective, the linguistic ambiguity of the agreement (i.e. the absence of clear sequencing of actions and enforcement mechanisms) has become a communicative resource that enabled state actors to legitimize opposing action and narratives while claiming adherence to the same text (Åtland 2024). Unlike the case of UNSC Resolution 242 where divergent interpretations arise from different language versions (e.g., English versus French), or the Sino–British Joint Declaration where a shared term such as “a high level of autonomy” (高度自治) carries culturally distinct legal meanings, the Minsk Agreements present a different type of treaty ambiguity. Both Minsk I and Minsk II were negotiated and published in Russian (with English translations used by mediators), and the treaty disputes do not stem from translation discrepancies but from an indeterminate sequencing of words and their vague practical meanings. From a theoretical standpoint, the Minsk agreements is an example of SCCT and Image Restoration Theory, where state actors adjust their communication strategies according to their perceived responsibility and reputational threat (Coombs, 2007; Benoit, 1997). Actors form into different groups based on the level of responsibility: the victim cluster includes those with minimal or no responsibility (e.g. in cases such as natural disasters and terrorism), while the preventable (or intentional) cluster includes actors who are blamed for wrongdoing or negligence (Coombs, 2007). In this context, both Russia and Ukraine are situated in distinct yet overlapping groups.

Ukraine confronted a dual reputation challenge. On one hand, it faced criticism from Russia who actively accused it of being responsible for the conflict and failing to complying with the Minsk Agreements. Russian officials, including the Foreign Ministry spokesperson Maria Zakharova, repeatedly emphasized in public speech that Ukraine’s avoidance of direct dialogue with representatives from the Donbas is undermining the Minsk peace process (European Parliament, 2014). On the other hand, Ukraine was also subject to a performance-related criticism rooted in its state capacity and governance challenges. Despite Western military support and extensive financial assistance through extensive International Monetary Fund loan programs and additional standby

arrangements, it was unable to achieve decisive military success in stabilizing the separatist-held territories; in fact, all major actors who took part in the conflict, including Ukraine, Russia, the United States, and the European Union suffered losses of resources and credibility (Charap & Colton, 2017; Åslund, 2015, World Bank, 2018). Moreover, frequent political turnover, including the resignation of Prime Minister Arseniy Yatsenyuk in April 2016, the replacement of multiple key ministers, as well as the domestic concerns over constitutional reform and corruption also raised doubt about Ukraine's ability to deliver effective governance (Åslund, 2015; D'Anieri, 2019). In response to those reputational risks, Ukraine positioned itself within SCCT's victim cluster, which was widely acknowledged by many Western governments, the United Nations, and international legal forum such as the European Court of Human Rights, particularly in light of Russia's annexation of Crimea in 2014 and support for separatists' forces in Donbas (UNSC Resolution 68/262, 2014). But this position was often challenged by Russia who reframed Kyiv as an unreliable and even obstructive negotiator that was intentionally escalating tensions to avoid fulfilling its obligations. This framing effectively sought to shift Ukraine from a victim cluster, where its reputational risks stem from external aggressions to a preventable cluster where Ukraine is self-inflicting policy failures and reputational damage (Coombs, 2007).

Answering to Russia's claims that Ukraine lacked a political will to compromise and implement its political obligations under Minsk II, Ukrainian officials also adopted a position of conditional compliance by consistently auguring that political measures including granting "special status" and local elections could only be implemented following a ceasefire and full withdrawal of foreign troops. This narrative aligns with what SCCT calls a "corrective action" approach, in which Ukraine publicly demonstrates willingness to fulfill obligations while attributing failures to external and uncontrollable conditions (Coombs, 2007). Moreover, in contrast to Russia's effort to place Ukraine in a preventable cluster, Ukraine presented itself as a democratic guardian by consistently emphasizing their alignment with a rules-based international order rooted in sovereignty, territorial integrity, and transparent

conflict resolution. In his September 2015 address to the United Nations General Assembly, President Petro Poroshenko declared: “Freedom, peace, respect for the sovereignty and territorial integrity – Ukraine doesn’t demand more. However, it will not settle for less” (Poroshenko, 2015). Moreover, at high-level meetings such as OSCE Permanent Council Meetings, Ukrainian MFA Press Briefings, UN Security Council sessions, and Public Presidential Communications, Ukrainian leaders regularly cited OSCE Special Monitoring Mission (SMM) reports to highlight ceasefire violations and cross-border weapon transfers and pinpoint at Russia as the party violating the agreements (Reuters, 2022a; CBS News, 2022). These narratives positioned Ukraine as a cooperative state ready to comply with Minsk obligations but physically prevented from doing so due to ongoing aggression from Russia.

Russia, in turn, faced heavier reputational risks from widespread international condemnation for its military and political support for the separatists. It was thus within SCCT’s preventable cluster by default. From the outset of the Minsk process, however, Russia has consistently sought to redefine its image by portraying itself as a peace mediator between Kyiv and the separatist-held territories. This was reflected in the official diplomatic language that often described the conflict as an “internal Ukrainian crisis” and positioned Russia as a “guarantor of security” under the Minsk agreements (Ministry of Foreign Affairs of the Russian Federation, 2015a). State-controlled outlets such as TASS and RIA Novosti reinforced Russia’s strategy of denial by describing its actions in Donbas as morally necessary, using terms such as “миротворческая миссия” (peacekeeping mission) and “гуманитарная миссия” (humanitarian mission) when reporting on Russian humanitarian convoys and peacekeeping proposals in the contested territories (TASS, 2015; RIA Novosti, 2015). To make these narratives more credible, Russia invoked the idea of a shared Soviet past and Orthodox Christian heritage, and thus it had a humanitarian obligation to safeguard Russian-speaking compatriots abroad especially because of their shared Soviet past and Orthodox Christian heritage (Benoit, 1997; Mamedov, 2024; Chang, 2022). In 2011, for instance, in President Putin asserted in his essay “*On the*

*Historical Unity of Russians and Ukrainians*” that “Russians and Ukrainians are one people, a single whole...,” which reflected Russia’s broader ideological and political stance towards the conflict with Ukraine (Putin, 2021). Allied media outlets, such as Belarusian state media and pro-government Telegram channels, amplified Russia’s rhetorical strategy by characterizing Ukraine as a “terrorist,” “punisher” state and prompting the idea of “a looming Western threat” allegedly planned by Ukraine (Katerynych, 2023).

Social media platforms in both countries echoed these official frames, creating a mutually reinforcing loop between top-down messaging and grassroots discourse. In line with Moscow’s narrative of the war as an internal Ukrainian issue, Russian-language social media regularly adopted terms such as “нацисты” (Nazis) and “каратели” (punishers) which were intended to de-legitimize the Ukrainian government. In contrast, Ukrainian internet overwhelmingly framed the conflict as foreign threat by using terms such as “агресія” (aggression), “окупант” (occupier), and “вторгнення” (invasion) (Gouliev, 2025). State-aligned terminology permeated public opinion and was subsequently used by state actors to normalize resistance and enhance international legitimacy. It also created an echo chamber on the internet where domestic audience were exposed to ideas only available in their respective informational environment.

#### 4.4 Conclusion

This chapter has traced each case study from the emergence of the conflict, the drafting process of the agreement, and to the post-agreement implementation stage where divergent interpretations and confrontations occur. It provides the legal-linguistic basis of the treaty ambiguity and adopts a crisis communication perspective to demonstrate how state actors strategically leave the key terms and phrases vague inside the agreements and subsequently defend their own narratives in public without resolving the vagueness. While each case represents different historical era and geopolitical tension, they all reveal the same pattern where treaty ambiguity is discursively exploited by states in moments

of tension and to an extent ignored because none of the state parties seeks to acknowledge the difference and propose reconciliation. This sets the stage for chapter 5, which categorizes the recurring patterns across the cases and reflects on how ambiguous treaty language contributes to the occurrence and persistence of international crises.

# Chapter 5 Patterns, Counterarguments, and Implications

## 5.1 Recurring Patterns

This thesis begins with the proposition that linguistic ambiguities in multilingual treaties are more than mere technical flaws. They are catalysts for diplomatic and public crises. The preceding chapters have substantiated this claim by deconstructing the legal, linguistic, and most importantly, the communicative dimensions of three pivotal international agreements. Through the analytical lenses of crisis stage model, Situational Crisis Communication Theory, Image Restoration Theory, and framing, this research has moved beyond asking *why* ambiguities exist to examining *how* they are communicated and politicized in moments of conflicts. This concluding chapter will synthesize the findings from the case studies of UN Security Council Resolution 242, the Sino-British Joint Declaration, and the Minsk Agreements. The following table 2 offers a summary of the three case studies as a reference, including their main ambiguous phrase, the timing of the crisis, and the communicative challenges that follow suits. This section will present a typology of treaty ambiguity that emerged from the cases, followed by a comparative reflection on state strategies and conflict outcomes. Finally, it will address the broader implications on treaty drafting and crisis communication studies, offer recommendations for practitioners in international law and diplomacy, and provide suggestions for future research.

**Table 5: Summary of the Case Studies**

Treaty / Agreement	Year Signed	Main Ambiguous Phrase(s)	When Crisis Emerged	Communicative Challenges
UNSC Resolution 242	1967	withdrawal from territories occupied vs. retrait...des territoires occupés	Late 1960s–1970s (Arab-Israeli disputes)	Diverging translations (French vs English); conflicting interpretations over the scope of withdrawal.
Sino-British Joint Declaration	1984	high degree of autonomy	2000s–present (with occasional protests and violence breaking out)	Legal vagueness in defining autonomy; public denial of continued validity
Minsk Agreements	2014-2015	special status of Donbas & sequencing of obligations: ceasefire vs. local elections vs. border control.	2015–present (Russia-Ukraine conflict)	No Ukrainian language version; dispute over sequencing of actions

A comparative analysis of three major case studies has demonstrated that ambiguity in treaty language often serves a dual function: it facilitates negotiations by tabling major contestation, and it provides a rhetorical basis for states to construct competing narratives around the same text. The nature of the

ambiguity itself also profoundly shapes the trajectory of the communication crisis. Three types of ambiguity emerge based on the case studies: lexical ambiguity, conceptual ambiguity, and structural ambiguity. These types are not rigid boxes that place each case study in isolation; rather, they reveal how different forms of ambiguity inside an agreement can intersect and reinforce one another. Lexical ambiguity is the most direct and visible form of ambiguity which generates disputes over a specific word or sentence. The example is UNSC Resolution 242, where the presence of a definite article in the French text (“des territories”) and its absence in the English text (“territories”) allow both Israel and Arab states to claim opposing narratives. This lexical dispute is possible because of a structural feature of international law: the principle of equally authentic texts of international agreements. Despite the fact that the two versions contain a significant lexical difference and generate two competing political obligations, this principle validates both versions and thus pave ways for a perpetual, cycling crisis. States claim performative compliance to international law by conveniently selecting one version of the interpretation that serve their interests. Conceptual ambiguity is the second form of ambiguity, which concern an abstract term represents divergent legal-cultural understandings. The Sino-British Joint Declaration is a clear example as its guarantee of “a high degree of autonomy” over Hong Kong entails two incompatible political obligations. For PRC, the concept is derived from its unitary constitutional tradition, where autonomy is delegated and revocable from a central government in Beijing. For the UK, autonomy is rooted in a liberal democratic tradition where it warrants substantial self-governance. This conceptual ambiguity allows both state governments to claim compliance with the same words while constructing fundamentally opposed political realities. The third type of ambiguity is structural ambiguity, which originates from the architecture of the agreement itself. The structural issue inside the Minsk Agreements, which includes a vague sequencing, procedure and enforcement mechanisms, hinders concrete political and security measures. Moreover, this structural flaw is deeply intertwined with conceptual ambiguity as Russia and Ukraine disagree on the substance of “special status” and “autonomy.” Similar to the case of Sino-British Joint Declaration where state parties have diverse legal-cultural tradition, Ukraine

adopts a unitary understanding, which clashes with Russia's federal-style model of governance. This convergence of structural and conceptual ambiguity makes the agreements unworkable from two different angles simultaneously.

These ambiguities are not passive legal problems awaiting technical clarification. Because they are born from a lack of genuine consensus during negotiations, they inevitably erupt into the public sphere as political and reputational crises. At this point, the dispute is no longer about legal interpretation or even resolving the conflict; it is about controlling narratives and preserving national image. This is why crisis communication theories provide an effective lens for analysis. They allow us to decode the strategies state actors use not to solve the problem, but to survive it politically. Placing these cases in direct conversation also reveals telling patterns in how state actors manage ambiguity-driven crises. In cases where the ambiguity is lexical or conceptual, states often engage in competing justification frames. Israel, for instance, justifies its position on UNSC 242 by repeatedly pointing to the legal correctness of the English text and the drafters' intent. Similarly, the UK asserts the continued validity of the Declaration as a legally binding treaty based on UN registration and an absence of an expiration clause. In contrast, more multifaceted ambiguities enable strategies of denial. PRC's claim that the Joint Declaration is a "historical document" is form of denial that sought to render the entire interpretive debate moot by revoking the treaty's relevance. Russia's denial concerning the Minsk Agreements is different: it frames itself as a neutral "mediator" to deny its status as a party to the conflict and shift all implementation responsibility to Ukraine.

A key finding across all three cases is the failure to transition to a genuine post-crisis stage of resolution and learning. The crisis over UNSC 242 has settled into an institutionalized discursive deadlock, a state of chronic, low-intensity crisis where the "post-crisis" phase is never reached. The intertwined ambiguities of the Minsk Agreements also create a functional paralysis that ultimately collapse into open warfare, demonstrating that when ambiguity is tied to critical on-the-ground

actions, the failure of statecraft leads to catastrophic failure rather than mere deadlock. Ultimately, the outcome in all three cases is the same: the core issue remains permanently unresolved. The involvement of the international community has proven incapable of breaking this cycle because these third parties could only address the symptoms of the crisis (the interpretive dispute) rather than its root cause: the fact that the primary state actors never intend to come to a mutually binding and enforceable agreement. The failure of implementing the treaty is a direct consequence of the initial lack of political will. State actors remain locked in a looping narrative of blame because resolving the ambiguity would require the political concessions they are never willing to make. And thus, the crisis communication strategies deployed by state actors are ineffective at producing a stable outcome precisely because they never mean to reach a long-term peace. Winning a rhetorical battle and gaining reputation matter more than providing sustained security for the civil society. And more importantly, reputational crises remain self-inflicted: state parties write ambiguous provisions into agreements, sign them, and later exploit those same ambiguities to justify non-compliance or intensified military actions.

This research does not claim that all geopolitical crises result from linguistic ambiguities inside international agreements, given the multiple layers of obstacles that factor to a crisis, such as conflicting state interests, power asymmetries, third-party interference, and religious tensions. Nor will it provide a simple set of recommendations for those involved in treaty writing and interpreting process, considering diplomats and negotiators are highly educated actors who should be fully aware of the risks that ambiguity entails. This thesis demonstrates that the most important function of studying treaty ambiguity is diagnostic. The deliberate inclusion of ambiguity in a legal text is a powerful indicator that states are prioritizing the appearance of a consensus over a durable, shared understanding. It reveals, from the outset, that the treaty may not be a genuine instrument of conflict resolution, but rather “empty talk on paper,” a performance of diplomacy designed to postpone conflict without resolving it. And thus, the existence of certain “flawed agreements” is not a product

of ignorance, but of the immense political pressure to produce a tangible outcome even when a true consensus is politically impossible. The choice is often between a dangerously ambiguous agreement and no agreement at all. Recognizing this deeper reality, the implications of this research are less about instructing practitioners but more about providing a clearer diagnosis of the structural limitations and cynical realities of modern diplomacy.

*Constructive ambiguity* is a widely accepted practice in diplomacy because it allows state actors to present the signing of a treaty as a political victory, satisfying domestic and international pressure, while consciously deferring the inevitable conflict. The negotiation itself becomes the deliverable, not the peace it promises. For analysts and the public, the presence of such ambiguity in a high-stakes agreement should be seen as a powerful warning that the process may be more about political theatre than substantive conflict resolution.

This research also confirms the futility of procedural fixes in the absence of genuine political will. International organizations such as the United Nations or the OSCE often display a stronger attachment to procedural formality than concrete solutions, and at times, they legitimize a process that is fundamentally hollow. They enable states to replace substantial action with formal compliance, perform negotiation in a multilateral forum without resolving core disagreements, and ultimately claim success by merely producing an agreement, however ambiguous or unenforceable it is. Diplomats do not lack the tools to achieve clarity; they often choose not to have clarity because forcing a precise definition on a contentious issue would risk the collapse of negotiations, which will be perceived as a greater political failure. The ambiguity is the necessary price for a document, and no amount of procedural innovation can substitute for the fundamental lack of will to achieve concessions and true peace.

In this context, the mediators are caught in a contradictory situation. They are no longer neutral facilitators but institutional actors that are under the pressure to produce a “successful,” signed documents that validates their own relevance. They become complicit in brokering a deliberately imperfect agreement, knowing that a reputational crisis is not a possibility, but a certainty baked into its very language.

Nevertheless, this thesis seeks to at least contribute to crisis communication studies by highlighting that in international relations, reputational crises are often not external imposition but are self-inflicted. States create the conditions for their own reputational damage by co-authoring ambiguous treaties they later refuse to honor. The prolonged political crisis and a sustained discursive deadlock are the direct result of their own calculated decisions to avoid costly political concessions during the negotiation process. There is therefore hardly a post-crisis stage, as the traditional model of crisis stage expects, where state actors reflect and learn from the mistakes. The inherent differences in national interests and a lack of political will to resolve them suggest that geopolitical crisis may never reach an end. And even when a temporary solution is present to offer short term relief, it does not eradicate the underlying incompatibilities that trigger may future crises.

## 5.2 Counterarguments: Is Ambiguity a Strategic Necessity?

A widely acknowledged view in international diplomacy is that ambiguity is often necessary, particularly in high-stakes negotiations where political expediency is required and a full consensus is political impossible. In other words, the ambiguity itself is the key to the agreement’s existence. *Constructive ambiguity*, as defined by linguistic and diplomatic literature, is considered as a mechanism to facilitate negotiations and achieve superficial agreement without the risk of collapsing the entire peace process. From this perspective, treaty ambiguity is a pragmatic choice to perform compliance, achieve an agreement on paper, and postpone the immediate conflict to the implementation stage.

And yet, this line of reasoning is a reductionist solution to what is in fact a far more complex diplomatic maneuvering. Producing an international agreement should never be mistaken for resolving a conflict. Ending the conflict is. The signing of a paper may provide a symbolic and temporary breakthrough, but it is not a diplomatic success itself if the agreement fails to address the essential incompatibilities. Leaving the ambiguity unaddressed shifts the burden of reconciliation from negotiation to implementation, and in reality, it complicates the implementation further because state can invoke an official agreement to boost their contradictory narratives while claiming adherence to international law. This grants legitimacy especially in front of the domestic audience.

This thesis does not deny the practical function of ambiguity to facilitate collaboration or a tangible result. There are indeed instances where a certain degree of ambiguity allows an agreement to be successfully negotiated and implemented to resolve a conflict, but that does not mean ambiguity is a stable substitute for political compromise. And yet, it comes at a cost. When a conflict inevitably resumes, the same ambiguities that have sustained the agreement become a tool for its breakdown. The deliberate evasion of substantive consensus inside an international agreement also undermines its credibility.

### 5.3 Implications

The cynical reality is that international agreements, while intended to be a form of solution, are actually part of the instruments of conflict. This opens several critical directions for future research, especially in the field of diplomacy and international organizations, that must acknowledge this hard truth. Scholars must critically investigate the content of the agreements as well as the power dynamics inherent in treaty language. The dominance of certain legal and linguistic traditions, particularly those rooted in Western practice, and the reluctance to respect the alternative framework, reflect an institutional inertia and lack of incentive. States are compelled to negotiate and agree to terms that

carry nuances in difference legal traditions. While legal scholars may attempt to offer a more balanced explanations by considering multiple legal perspectives, such efforts rarely filter into public discourse. Media outlets, political commentators, and the public tend to bypass those complex nuances and believe in their own instincts and pervasive national narratives. How are certain legal concepts reinterpreted by different countries, and how are they reframed in national discourse?

A deeper analysis is also urgently needed on the feedback loop between international posturing and domestic politics. How, precisely, do state leaders use the narratives of international treaty “betrayal” or “vindication” to consolidate internal political support, suppress dissent, or justify nationalist agendas? Conversely, how does the domestic, nationalistic pressure then encourage these same leaders to constrain their diplomatic options, making future compromise politically untenable?

Finally, while this thesis has focused on communication deadlock, future research could explore rare cases where treaty ambiguities were successfully managed or resolved. However, this research must be critical by deconstructing what “success” of a negotiation or a treaty truly means. Did resolution occur because of genuine political will, or because of a fundamental shift in the power balance that forces one party to concede? Was it the result of strong third-party enforcement, or was the “successful” interpretation simply the one that aligned with the interests of the most powerful actors. By questioning the very nature of successful resolutions, we can gain a more realistic understanding of whether it is possible to break the cycle of discursive deadlock, or if international law, in these cases, will always be subordinate to the realities of power play.

## 5.4 Conclusion

In conclusion, the crisis surrounding treaty language are more of a problem of intent. This thesis has shown that when state actors lack the political will to resolve a conflict, they transform the very language of peace into an instrument of perpetual dispute, often within the procedural mechanism of

international organizations either as an international pressure or as a symbolic gesture of compliance. The resulting treaties or any type of agreements become part of a failed process, where the language creates conditions for self-inflicted political and communication crises. The study of these three highly consequential case studies and suggestions for future research serve a sobering reminder that in the absence of genuine commitment from state actors, international law does not stand above politics but becomes another arena for its cynical performance, where the brutal cost is ultimately paid by the people they claim to protect.

## Conclusion

Multilingual international agreements sit at the intersection of law, language, and legitimacy, the three foundational pillars where global order is supposedly negotiated. Yet when states sign agreements that possess legal equality but semantic divergence, they are causing confusion and weaving ambiguity into the peace process. This thesis explores a rather provocative idea that some of the most enduring international crises are caused by the very peace agreements designed to end them. It challenges the conventional view in academics and diplomacy that treaty ambiguity is a technical inevitability or a necessary compromise to accommodate different legal and linguistic traditions. This research offers a critical re-evaluation by asking to what extent is ambiguity an unavoidable linguistic constraint, and to what extent does it signal states' intent to perpetuate the crisis. It argues that ambiguity in multilingual international agreements is a cynical diplomatic choice that allows states to project the image of peace and cooperation, giving false hope to the people in moments of crisis, while avoiding a genuine, long-term solution.

To support this claim, the research chooses three politically salient cases: UNSC Resolution 242, the Sino–British Joint Declaration, and the Minsk Agreements. Each case carries a distinct form of treaty ambiguity that sustains a long-term political crisis, and each reveals how states actively exploit the ambiguous language it to serve their interests. As demonstrated in Chapter 4 and 5, states utilize the legal and linguistic basis of ambiguity to engage in a full-scale diplomatic and public rhetoric battle to amplify their chosen interpretations, assign responsibility to opponents, and justify their (non-)compliance to the agreements. A clear pattern emerges as in how ambiguity discursively and cyclically manufactures a crisis, allowing each party to walk away with its own version of victory. This reveals an important insight, that crisis communication in international diplomacy is not a reactive process of reputational damage control, but a premeditated, looping mechanism, where states craft language that permits selective interpretation, precisely so that future accusations, denial and justifications can be managed within a flexible narrative framework. The traditional crisis model,

with its linear sequence of pre-crisis build-up stage, resolution and recovery, is insufficient for understanding the political crisis stemming from treaty ambiguity. When political expediency overrides clarity during negotiations, treaty ambiguity guarantees future conflict. As long as the language inside an official agreement remains contested after its adoption, the crisis will continue to unfold in new forms with higher costs, whether in new negotiations, endless agreements, or new military confrontations.

This realization points to a profound irony in modern diplomacy. The act of signing an agreement is too often mistaken as a diplomatic success, even when the document itself endorses implicit contradictions and future breakdown. Third-party actors such as other countries or organizations that monitor and mediate these processes may become complicit in facilitating an ultimate failure by rewarding the production of an agreement regardless of its clarity or enforceability, mistaking performance for progress, and privileging the appearance of consensus over substance. This reality is not limited to the three cases studied above. From ceasefire agreements to global climate accords, the use of strategic treaty ambiguity remains a pragmatic diplomatic tool, but rarely is it interrogated for its long-term consequences. It is praised for the immediate result that it produces: a roundtable for negotiation, a publicly accessible document, a symbolic commitment to cooperation, and a temporary sense of progress. Yet these results are often superficial and short-lived. The consequence is that people in crisis-affected areas continue to live through instability and false promises. It is not diplomats or negotiators who bear the cost of using unclear language. It is the civilians.

This thesis does not reject the occasional practicability of treaty ambiguity, but it wishes to serve as a reminder for scholars, practitioners and publics that negotiating something on paper is never the stopping point. In a fragmented world of conflicting interests, ideologies, and legal systems, ambiguity may be necessary to keep the parties at the negotiation table. But necessity should not obscure accountability. The way in which ambiguity is constructed, exploited and extended through

language and communication by various actors involved in the crisis sheds lights on the potential cycle of discursive deadlock. What exactly has been agreed? What has been omitted? How many interpretations can the same text plausibly sustain? Until these questions are asked, the cost is not merely seen in diplomatic confusion but is always borne by the people that it claims to protect.

## List of Tables and Figures

**Table 1: Summary of Theoretical Frameworks**

Disciplinary Origin	Theory/Concept	Key Concepts
International Law	<b>Rules of Interpretation</b>	<i>Treaties should be interpreted in good faith, using the ordinary meaning of the words in context and aligned with the treaty's purpose</i>
	<b>Supplementary Means</b>	<i>If interpretation leads to unclear meaning or absurd results, preparatory work and background context may be used to clarify it</i>
	<b>Equal Authenticity</b>	<i>All language versions of a treaty are equally valid, and no version has legal supremacy unless otherwise agreed</i>
Linguistics	<b>Lexical Ambiguity</b>	<i>A single word or phrase has multiple meanings</i>
	<b>Structural (Syntactic) Ambiguity</b>	<i>Sentence structure allows multiple interpretations</i>
	<b>Speech Act Theory</b>	<i>Language performs actions (e.g., promises, declarations)</i>
	<b>Conceptual Ambiguity</b>	<i>An abstract idea that can be interpreted differently based on conceptual frameworks</i>
Crisis Communication	<b>Situational Crisis Communication Theory (SCCT)</b>	<i>Crisis response strategies (denial, deflection, bolstering); attribution of responsibility</i>
	<b>Image Restoration Theory</b>	<i>Organizations (or states) attempt to restore their reputation after a damaging event.</i>
	<b>Framing Theory</b>	<i>Diagnostic, motivational, and prognostic framing; control over problem definition</i>
	<b>Staged Crisis Model</b>	<i>Crises evolve through phases. Each stage invites different communication strategies.</i>
	<b>Stakeholder Theory</b>	<i>All actors involved in or affected by the crisis are stakeholders, depending on their levels of impact and influence</i>

**Table 2: Types of International Instruments**

Term	Definition	Multiple Languages?	Binding?	Examples
<b>Agreement</b>	A broad umbrella term that includes treaties and other arrangements (e.g., MoUs, declarations, etc.).	Depends on the exact type	Depends (on form/intent)	Paris Agreement; Minsk Agreements
<b>Treaty</b>	A formal, legally binding agreement between states under international law. Usually registered with the UN.	Depends: could be English–French, or any combination agreed by parties	Yes	Treaty of Versailles; UN Charter
<b>Convention</b>	A multilateral treaty, often adopted under an international organization and open to many states.	Yes: the official languages of the hosting organization	Yes	Geneva Conventions
<b>Protocols</b>	A supplementary treaty that adds to or modifies a convention or treaty.	Yes: same as the parent treaty/convention	Yes	Kyoto Protocol; Protocols to the Geneva Conventions
<b>Declaration</b>	A formal statement of principles or intentions. Often non-binding unless tied to a binding instrument or practice.	No formal requirement, and depends on the forum (e.g., UN, G7, EU)	Depends (on intent/practice)	Universal Declaration of Human Rights (non-binding); Declaration of Principles (binding in some cases)
<b>UNSC Resolution (Chapter VII)</b>	Security Council resolutions under Chapter VII of the UN Charter; binding on all UN member states.	Yes: in Arabic, Chinese, English, French, Russian, Spanish	Yes	UNSC Resolution 678 (Iraq); 1973 (Libya)
<b>UNSC Resolution (non-Ch. VII)</b>	Recommendations or expressions of opinion without enforcement power. May still carry strong political weight.	Yes: in Arabic, Chinese, English, French, Russian, Spanish	No	UNSC Resolution 242 (Middle East conflict)
<b>UNGA Resolution</b>	General Assembly resolutions expressing collective opinions or recommendations. Not legally binding.	Yes: in Arabic, Chinese, English, French, Russian, Spanish	No	Resolution 194 (Palestinian refugees); Resolution 2758 (PRC recognition)
<b>Memoranda of Understanding (MoUs)</b>	A mutual expression of intent or understanding between parties. Not binding unless explicitly stated.	No requirement: sometimes there are parallel texts, sometimes just one.	Depends (on explicit terms)	U.S.–China MoU on climate cooperation (non-binding)
<b>Exchange of Notes / Letters</b>	A series of diplomatic correspondences forming an agreement. Can be binding if intended as such.	No requirement: usually just one language (e.g., English)	Depends (on intent)	U.S.–Japan Security Agreement (Exchange of Notes)

**Table 3: Comparison of Ambiguity Across Five Versions**

Language	Key Phrase	Use of Article	Ambiguity?	Notes
English	“from territories occupied...”	No article: “territories”	High ambiguity	Allows “some” vs. “all” debate
French	“des territoires occupés”	“des” = “some” or contraction of “de les”	Moderately ambiguous	Can be interpreted as “some” or “the” depending on context
Spanish	“de los territorios que ocuparon...”	“los” = definite article	No real ambiguity	Clearly means “the territories they occupied” (i.e. all known territories)
Russian	“с территорий, оккупированных во время конфликта”	“с территорий” = from the territories	No real ambiguity	Definite reference to a specific set
Chinese	“其於最近衝突所佔領之領土”	Classical structure implies specificity	No ambiguity	Clearly means “the territories they occupied” (i.e. all known territories)

**Table 4: Summary of Main Interpretative Issues and Sources in Minsk II**

Step (text order)	Provision (article)	Plain meaning of the text	Main interpretive issues
1	Art. 9 (first clause)	Hold local elections in the “individual areas” of Donetsk & Luhansk	1) Must be “in accordance with Ukrainian law” & “OSCE standards” (Arts 4 & 12); 2) No timetable for withdrawal of foreign/illegal forces before elections
2	Art. 11	Adopt & enact a constitutional reform by end-2015, providing “decentralization” and “permanent legislation on special status” for Donetsk & Luhansk	1) Content of “special status” undefined; 2) No procedure for resolving lack of agreement with separatist representatives
3	Art. 9 (second clause)	Restore full control of the state border to Ukraine, starting the day after local elections and completing after a “comprehensive political settlement”	1) Meaning of “comprehensive settlement” unclear; 2) Border control explicitly made conditional on Steps 1–2
4 (implicit)	Arts 4, 10, 12	Preconditions for elections: OSCE monitoring, security guarantees, withdrawal of illegal armed groups	Text does not specify how or when these conditions must be satisfied relative to Steps 1–3
5 (structural)	Preamble / overall context	Trilateral Contact Group to agree modalities with “representatives of certain areas”	1) No clear mechanism if negotiations fail; 2) scope of their veto power ambiguous

**Table 5: Summary of the Case Studies**

Treaty / Agreement	Year Signed	Main Ambiguous Phrase(s)	When Crisis Emerged	Communicative Challenges
UNSC Resolution 242	1967	withdrawal from territories occupied vs. retrait...des territoires occupés	Late 1960s–1970s (Arab-Israeli disputes)	Diverging translations (French vs English); conflicting interpretations over the scope of withdrawal.
Sino-British Joint Declaration	1984	high degree of autonomy	2000s–present (with occasional protests and violence breaking out)	Legal vagueness in defining autonomy; public denial of continued validity
Minsk Agreements	2014-2015	special status of Donbas & sequencing of obligations: ceasefire vs. local elections vs. border control.	2015–present (Russia-Ukraine conflict)	No Ukrainian language version; dispute over sequencing of actions

## Figure 1: Resolution 242 in English and French

1. *Affirms* that the fulfilment of Charter principles requires the establishment of a just and lasting peace in the Middle East which should include the application of both the following principles:

- (i) Withdrawal of Israel armed forces from territories occupied in the recent conflict;
- (ii) Termination of all claims or states of belligerency and respect for and acknowledgement of the sovereignty, territorial integrity and political independence of every State in the area and their right to live in peace within secure and recognized boundaries free from threats or acts of force;

1. *Affirme* que l'accomplissement des principes de la Charte exige l'instauration d'une paix juste et durable au Moyen-Orient qui devrait comprendre l'application des deux principes suivants :

- i) Retrait des forces armées israéliennes des territoires occupés lors du récent conflit;
- ii) Cessation de toutes assertions de belligérance ou de tous états de belligérance et respect et reconnaissance de la souveraineté, de l'intégrité territoriale et de l'indépendance politique de chaque Etat de la région et de leur droit de vivre en paix à l'intérieur de frontières sûres et reconnues à l'abri de menaces ou d'actes de force;

## Figure 2: Resolution 242 in Spanish<sup>13</sup>

- i) Retiro de las fuerzas armadas israelíes de los territorios que ocuparon durante el reciente conflicto;

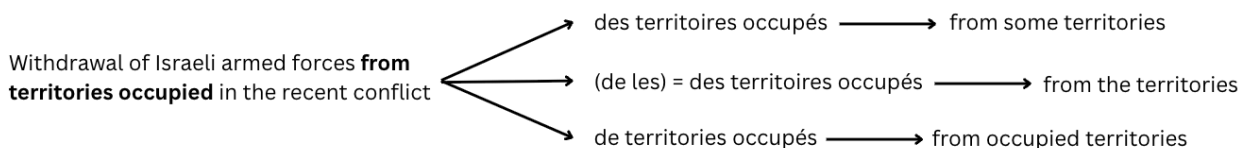
## Figure 3: Resolution 242 in Russian<sup>14</sup>

- i) вывод израильских вооруженных сил с территорий, оккупированных во время недавнего конфликта;

## Figure 4: Resolution 242 in Chinese<sup>15</sup>

- (一) 以色列軍隊撤離其於最近衝突所佔領之領土;

## Figure 5: Possible translations of Resolution 242



<sup>13</sup> Translation: Withdrawal of Israeli armed forces from the territories they occupied during the recent conflict.

<sup>14</sup> Translation: Withdrawal of Israeli armed forces from the territories occupied during the recent conflict.

<sup>15</sup> Translation: Israeli armed forces withdraw from the territories they occupied during the recent conflict.

Figure 6: Clause 2 of Article 3 in English

- (2) The Hong Kong Special Administrative Region will be directly under the authority of the Central People's Government of the People's Republic of China. The Hong Kong Special Administrative Region will enjoy a high degree of autonomy, except in foreign and defence affairs which are the responsibilities of the Central People's Government.

Figure 7: Clause 2 of Article 3 in Chinese

(二)香港特别行政区直辖于中华人民共和国中央人民政府。除外交和国防事务属中央人民政府管理外，香港特别行政区享有高度的自治权。

## References

- Al Jazeera English. (2017). Palestinians speak out on anniversary of Resolution 242. *Al Jazeera English*. <https://www.aljazeera.com/news/2017/11/19/palestinians-speak-out-on-anniversary-of-resolution-242>
- Aleksejeva, N. (2023). Narrative warfare: How the Kremlin and Russian news outlets justified a war of aggression against Ukraine. *Atlantic Council Digital Forensic Research Lab*. <https://medium.com/dfrlab/narrative-warfare-kremlin-justification>
- Alexeev, M. (2017). How the Minsk Accords Destabilize Ukraine. *PONARS Eurasia Policy Memo* No. 456. [https://www.ponarseurasia.org/wp-content/uploads/attachments/Peprm456\\_Alexseev\\_Feb2017.pdf](https://www.ponarseurasia.org/wp-content/uploads/attachments/Peprm456_Alexseev_Feb2017.pdf)
- Allan, D. (2020). Minsk deadlock: West must reject Russian bid to limit Ukrainian sovereignty. *Atlantic Council*. <https://www.atlanticcouncil.org/blogs/ukrainealert/minsk-deadlock-west-must-reject-russian-bid-to-limit-ukrainian-sovereignty/>
- Allan, D. (2020). The Minsk conundrum: Western policy and Russia's war in Eastern Ukraine. *Chathamhouse*. <https://www.chathamhouse.org/2020/05/minsk-conundrum-western-policy-and-russias-war-eastern-ukraine-0/minsk-2-agreement>
- Arbatova, N. (2022). Were The Minsk Agreements Doomed to Failure? An Alternative History. *Пути к миру и безопасности*, S1(62), p. 107-120. <https://cyberleninka.ru/article/n/were-the-minsk-agreements-doomed-to-failure-an-alternative-history/viewer>
- Arginelli, P. (2015). Multilingual tax treaties: Interpretation, semantic analysis and legal theory. *IBFD Doctoral Series 33*. [https://www.ibfd.org/sites/default/files/2021-04/15\\_043\\_Multilingual%20Tax%20Treaties%20Interpretation\\_final\\_web\\_0.pdf](https://www.ibfd.org/sites/default/files/2021-04/15_043_Multilingual%20Tax%20Treaties%20Interpretation_final_web_0.pdf)
- Åslund, A. (2015). Ukraine: What Went Wrong and How to Fix It. *Peterson Institute for International Economics*. <https://ideas.repec.org/b/iie/ppress/7014.html>
- Åtland, K (2020). Destined for deadlock? Russia, Ukraine and the unfulfilled Minsk Agreements. *Post-Soviet Affairs*, 36(2), 122–139. <https://doi.org/10.1080/1060586X.2020.1720443>.
- Åtland, K. (2024). War, diplomacy, and more war: Why did the Minsk Agreements fail? *International Politics. Advance online publication*. <https://doi.org/10.1057/s41311-024-00637-x>
- Avineri, S. (2017). The Effects of the Six-Day War on Israeli Politics and Israel's International Status. INSS. <https://www.inss.org.il/wp-content/uploads/2018/11/Shlomo-Avineri.pdf>
- Bach, P., Schmitt, C. E., & McGregor, S. C. (2025). Let me be perfectly unclear: Strategic ambiguity in political communication. *Communication Theory*, 35(2), 96–106. <https://doi.org/10.1093/ct/qtaf001>
- Bell, C. (2008). Negotiating peace: The role of constructive ambiguity in peace processes. *International Institute for Democracy and Electoral Assistance*.
- Benoit, W. L. (1995). Accounts, excuses, and apologies: A theory of image restoration discourse. *State University of New York Press*.
- Berry, M (2004). Reporting on contested territory: television news coverage of the Israel-Palestine conflict. *University of Glasgow*. PhD thesis. <https://theses.gla.ac.uk/1548/>
- Boin, A., 't Hart, P., & McConnell, A. (2009). Crisis exploitation: Political and policy impacts of framing contests. *Journal of European Public Policy*, 16(1), 81–106. <https://www.tandfonline.com/doi/abs/10.1080/13501760802453221>
- Broglio, C. M., & Ortino, F. (2024). Treaty interpretation, Multilingualism, and the WTO dispute settlement system: Towards the comparative translation paradigm? *Journal of International Dispute Settlement*, 15(4), 487–505. <https://doi.org/10.1093/jnlids/idae016>
- CBS News. (2022). Transcript: Ukrainian Foreign Minister Dmytro Kuleba on “Face the Nation,” April 17, 2022. CBS News. <https://www.cbsnews.com/news/dmytro-kuleba-transcript-face-the-nation-04-17-2022>

- Chan, J., & Lee, F. (2022). *Media, Social Mobilization and Mass Protests in Post-colonial Hong Kong*. Routledge.
- Chang, E. (2022). The Minsk II Agreement as compliance leverage disparity. *Duke Lawfire*. <https://sites.duke.edu/lawfire/2022/02/23/eric-chang-on-the-minsk-ii-agreement-as-compliance-leverage>
- Charap, S., & Colton, T. (2017). Everyone Loses: The Ukraine Crisis and the Ruinous Contest for Post-Soviet Eurasia. *Routledge*. <https://www.routledge.com/Everyone-Loses-The-Ukraine-Crisis-and-the-Ruinous-Contest-for-Post-Soviet-Eurasia/Charap-Colton/p/book/9781138633087>
- Chawryło, K., & Iwański, T. (2019). No breakthrough at the Normandy Four summit in Paris. *OSW – Centre for Eastern Studies*. <https://www.osw.waw.pl/en/publikacje/analyses/2019-12-10/no-breakthrough-normandy-four-summit-paris>
- Cheng, E. W. (2023). Umbrella Movement in Hong Kong. *Asian History*. *Oxford University Press*. <https://oxfordre.com/asianhistory/display/10.1093/acrefore/9780190277727.001.0001/acrefore-9780190277727-e-737?d=%2F10.1093%2Facrefore%2F9780190277727.001.0001%2Facrefore-9780190277727-e-737&p=emailAAx0YeZJECsn>.
- Cheung, T. (2019). G20: activists call on world leaders in Osaka to press Xi Jinping on Hong Kong freedoms – and thank Shinzo Abe for already raising the issue. *South China Morning Post*. <https://www.scmp.com/news/hong-kong/politics/article/3016518/g20-activists-call-world-leaders-osaka-press-xi-jinping>
- Chinkin, C. M. (1989). The challenge of soft law: Development and change in international law. *International & Comparative Law Quarterly*, 38(4), 850–860.
- Chinkin, C. M. (2000). Normative development in the international legal system. In D. Shelton (Ed.), *Commitment and compliance: The role of non-binding norms in the international legal system* (pp. 21–42). *Oxford University Press*. <https://academic.oup.com/book/1535/chapter-abstract/140980509?redirectedFrom=fulltext>
- Cohen, M. (2016, June). Ukraine’s Battle at Ilovaisk, August 2014: Manufactured Insurgencies and Decision in War. *Army University Press*. <https://www.armyupress.army.mil/Portals/7/Army-Press-Online-Journal/documents/16-25-Cohen-10Jun16a.pdf>
- Committee for Accuracy in Middle East Reporting in America (CAMER). (2002). *Stop distorting UN Resolution 242*. [https://www.camera.org/images\\_user/advertisements/large/242ad.pdf](https://www.camera.org/images_user/advertisements/large/242ad.pdf).
- Coombs, W. T. (2007). *Ongoing crisis communication: Planning, managing, and responding* (2nd ed.). SAGE Publications.
- Council on Foreign Relations. (2020). *Hong Kong’s freedoms: What China promised and how it’s eroded*. <https://www.cfr.org/backgrounder/hong-kong-freedoms-democracy-protests-china-crackdown>
- Creery, J. (2019, updated 2023). “Stand with Hong Kong”: G20 appeal over extradition law crisis appears in over 10 int’l newspapers. *Hong Kong Free Press*. <https://hongkongfp.com/2019/06/28/stand-hong-kong-g20-appeal-extradition-law-crisis-appears-10-intl-newspapers/>
- D’Amato, A. (1996). Purposeful ambiguity as international legal strategy: The Two China problem. In J. Makarczyk (Ed.), *Theory of international law at the threshold of the 21st century: Essays in honour of Krzysztof Skubiszewski* (pp. 109–121). Kluwer.
- D’Anieri, Paul. *Ukraine and Russia: From Civilized Divorce to Uncivil War*. Cambridge University Press, 2019.
- Davis, M. (2024). Ambiguous autonomy: Treaty language and governance in post-handover Hong Kong. *American University International Law Review*, 39(4), 623–648.
- DeGolyer, M. E. (1997). Public Opinion and the Hong Kong Transition. In J. Miners (Ed.), *The Government and Politics of Hong Kong* (pp. 29–63). Oxford University Press. Retrieved from [https://link.springer.com/chapter/10.1007/978-1-349-26296-0\\_2](https://link.springer.com/chapter/10.1007/978-1-349-26296-0_2)

- De Valdé, T. (1977). Authoritativeness of the English and French texts of Security Council Resolution 242 (1967) on the situation in the Middle East. *The American Journal of International Law*, 62(2), 345–350. <https://www.jstor.org/stable/2199532?seq=1>
- Du, Y. R., Zhu, L., & Yang, F. (2018). Media framing of the Umbrella Movement: Comparisons across mainland China, Hong Kong, Taiwan, the UK, and the US. *International Journal of Communication*, 12, 2557–2582.
- Dumoulin, M (2024). Ukraine, Russia, and the Minsk agreements: A post-mortem. *European Council on Foreign Relations*. <https://ecfr.eu/article/ukraine-russia-and-the-minsk-agreements-a-post-mortem/>
- Entman, R. M. (2004). Projections of power: Framing news, public opinion, and U.S. foreign policy. *University of Chicago Press*.
- European Parliament. 2014. “EU–Russia Relations: Delegation Meeting Documents (12\_dru\_20141126).” *European Parliament*. [https://www.europarl.europa.eu/meetdocs/2014\\_2019/documents/d-ru/dv/12\\_dru\\_20141126\\_/12\\_dru\\_20141126\\_en.pdf](https://www.europarl.europa.eu/meetdocs/2014_2019/documents/d-ru/dv/12_dru_20141126_/12_dru_20141126_en.pdf).
- Fairclough, N. (1995). Critical discourse analysis: The critical study of language. *Longman*. <https://www.felsemiotica.com/descargas/Fairclough-Norman-Critical-Discourse-Analysis.-The-Critical-Study-of-Language.pdf>
- Falk, R. (2007). Israel-Palestine and the UN: Divergent discourses. In R. Falk, B. Rajagopal & J. Stevens (Eds.). *International law and the third world: Reshaping justice*. Routledge.
- Fernández, I (2020). Multilingualism and the Meaning of EU Law. *European University Institute*. PhD Thesis. <https://cadmus.eui.eu/entities/publication/e01eedd8-49ed-57e5-b82c-0b5b2310d4f1>
- Fink, S. (1986). Crisis Management: Planning for the Inevitable. ISBN-10:0595090796. *iUniverse*.
- Finkelstein, N.G. (1996) The Rise and Fall of Palestine: A Personal Account of the Intifada Years. *Minneapolis: University of Minnesota Press*.
- Freedom House. (2025). Joint Statement from Civil Society Groups on the Hong Kong Government’s Targeting of Exiled Activists’ Families. *Freedom House*. <https://www.hrw.org/news/2025/05/07/joint-statement-civil-society-groups-hong-kong-governments-targeting-exiled>
- Freeman, R. E. (1984). Strategic Management: A Stakeholder Approach. Boston, MA: Pitman.
- Friedrich, J. (2025). Outcome neutrality and emerging mediators in the Minsk process. *Global Public Policy Institute (GPPI) Policy Brief*. [https://gppi.net/assets/OutcomeNeutral\\_GPPIPolicyBrief\\_Friedrich.pdf](https://gppi.net/assets/OutcomeNeutral_GPPIPolicyBrief_Friedrich.pdf)
- Gadzo, M. (2017). Palestinians speak out on anniversary of Resolution 242. *Al Jazeera*. <https://www.aljazeera.com/news/2017/11/19/palestinians-speak-out-on-anniversary-of-resolution-242>
- Ghai, Y. (1999). Hong Kong’s new constitutional order: The resumption of Chinese sovereignty and the Basic Law. *Hong Kong University Press*. [https://archive.org/details/hongkongsnewcons0000ghai\\_s9p9](https://archive.org/details/hongkongsnewcons0000ghai_s9p9)
- Goldmann, M. (2012). We need to cut off the head of the king: Past, present, and future approaches to international soft law. *Leiden Journal of International Law*, 25, 335–368. [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=1885085](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1885085)
- Gouliev, Z. (2025). Propaganda and information dissemination in the Russo-Ukrainian war: NLP of Twitter narratives. *Cornell University*. <https://arxiv.org/abs/2506.01807>
- Government of the United Kingdom & Government of the People’s Republic of China. (1984). Sino-British Joint Declaration on the question of Hong Kong. *HMSO*, Treaty Series No. 26. [https://www.cmab.gov.hk/doc/issues/jd\\_e.pdf](https://www.cmab.gov.hk/doc/issues/jd_e.pdf)
- Hamzawy, A (2025). Ending the new wars of attrition: Opportunities for collective regional security in the Middle East. *Carnegie Endowment*.

- <https://carnegieendowment.org/research/2025/03/ending-the-new-wars-of-attrition-opportunities-for-collective-regional-security-in-the-middle-east?lang=en>
- Hofmann, S. C. (2024). Dialectical order-making through ambiguity: Contestation is the norm in international peace and security maintenance. *Global Studies Quarterly*. <https://doi.org/10.1093/isagsq/ksae021>
- Hou, Z., & Peng, Q. (2023). The national security law for Hong Kong: A corpus-driven comparative study. *Humanities and Social Sciences Communications*, 10(1), Article 207. <https://doi.org/10.1057/s41599-023-01699-7>
- Human Rights Watch. (2021). Dismantling a free society: Hong Kong one year after the National Security Law. *Human Rights Watch*. <https://www.hrw.org/feature/2021/06/25/dismantling-free-society/hong-kong-one-year-after-national-security-law>
- Human Rights Watch. (2024). “We can’t write the truth anymore”: Academic freedom under threat in Hong Kong. *Human Rights Watch*. <https://www.hrw.org/report/2024/09/24/we-cant-write-truth-anymore/academic-freedom-hong-kong-under-national-security-0>
- Interfax-Ukraine. (2015). Local elections in DPR to take place on October 18 – Zakharchenko. *Interfax Ukrain*. <https://en.interfax.com.ua/news/general/275451.html>
- International Court of Justice (ICJ). (2001). LaGrand (Germany v. United States), ICJ Reports. <https://www.icj-cij.org/en/case/104>
- International Labour Organization (ILO). (2024). National legislation database: Law of Ukraine on supporting the functioning of the Ukrainian language. *ILO NATLEX*. [https://www.ilo.org/dyn/natlex/natlex4.detail?p\\_isn=92814](https://www.ilo.org/dyn/natlex/natlex4.detail?p_isn=92814)
- Iturralde Ulfsax, J. (2024). Unpacking the implementation challenges of the Minsk II Agreement. *Linnaeus University*. Master’s thesis. <https://www.diva-portal.org/smash/get/diva2:1866692/FULLTEXT01.pdf>
- Jackson, J. H. (1997). The WTO dispute settlement understanding: Misunderstandings on the nature of legal obligation. *American Journal of International Law*, 91(1), 60–64. <https://www.cambridge.org/core/journals/american-journal-of-international-law/article/wto-dispute-settlement-understandingmisunderstandings-on-the-nature-of-legal-obligation/9504D7090B6BB0B517B47690AA6577E4>
- Jin, Y., & Austin, L. (2022). *Social media and crisis communication* (2nd ed.). Routledge.
- Jozwiak, R. (2017). Merkel, Macron, Putin agree on ‘comprehensive’ implementation of Ukraine peace deal. *Radio Free Europe/Radio Liberty*. <https://www.rferl.org/a/ukraine-russia-merkel-macron-putin-talk-minsk-implementation/28603258.html>
- Kakoullis, E., & Malkani, B. (2021). Translating for human rights: A case for intentional ambiguity in multilingual legal instruments. *International Journal for the Semiotics of Law*, 34, 1079–1097. <https://doi.org/10.1007/s11196-021-09841-0>
- Katerynych, P. (2023). Propaganda at play: A thematic analysis of Belarusian media narratives in the context of the Russo-Ukrainian War. *Media Literacy and Academic Research*, 6(1), 23–31. [https://www.mlar.sk/wp-content/uploads/2023/06/2\\_Katerynych.pdf](https://www.mlar.sk/wp-content/uploads/2023/06/2_Katerynych.pdf)
- Kissinger, H. (1977). *White House Years*. Boston: Little, Brown and Company.
- Kitt, F. (2017). How China’s media framed the Hong Kong handover anniversary. *Lowy Institute*. <https://www.lowyinstitute.org/the-interpreter/how-china-s-media-framed-hong-kong-handover-anniversary>
- Koshiw, L. (2022). Everyone is talking about Minsk but what does it mean for Ukraine? *OpenDemocracy*. <https://www.opendemocracy.net/en/odr/russia-ukraine-what-are-the-minsk-agreements>
- Kuner, C. (1991). The interpretation of multilingual treaties: Comparison of texts versus the presumption of similar meaning. *International and Comparative Law Quarterly*, 40(4), 953–964. <https://www.jstor.org/stable/759965?seq=1>

- Law of the PRC on Regional Ethnic Autonomy. (1984, amended 2001). *Regional Ethnic Autonomy Law. National People's Congress*. [https://hrlibrary.umn.edu/research/china-autonomy\\_law.html](https://hrlibrary.umn.edu/research/china-autonomy_law.html)
- Law, F., & Lo, S. S. (2006). Goodstadt, L. (2005). *Uneasy Partners: The Conflict Between Public Interests and Private profit in Hong Kong*. Hong Kong University Press. <https://hkupress.hku.hk/image/catalog/pdf-preview/9789888028092.pdf>
- Legum, B., & Crevon-Tarassova, A. (2021). VCLT Article 33: Interpretation of treaties authenticated in two or more languages. In E. S. Shirlow & K. N. Gore (Eds.), *The Vienna Convention on the Law of Treaties in Investor-State Disputes* (pp. 45–70). [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4102287](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4102287)
- Lim, L. (2014). Scenes From Occupy Hong Kong's Last Stand. *The New Yorker*. <https://www.newyorker.com/news/news-desk/scenes-occupy-hong-kongs-last-stand>
- Machairas, D. (2017). The strategic and political consequences of the June 1967 War. *Cogent Social Sciences*, 3(1). <https://www.tandfonline.com/doi/full/10.1080/23311886.2017.1299555>
- Mamedov, I. (2024). A fragile narrative: Transformations and consistency in the Russian representation of the war in Ukraine. *Media, War & Conflict*. <https://journals.sagepub.com/doi/10.1177/17506352241264436>
- Mau, B. (2021). Linguistic ambiguity in Security Council resolutions: A multilingual analysis of 242. *Malmö University*. Master's thesis.
- McHugo, J. (2002). Resolution 242: A legal reappraisal of the right-wing Israeli interpretation of the withdrawal phrase with reference to the conflict between Israel and the Palestinians. *International and Comparative Law Quarterly*, 51(4), 851–882. <https://www.jstor.org/stable/pdf/3663190.pdf>
- Meital, Y. (1977). Egypt's struggle for peace: Continuity and change, 1967–1977. Council for Middle Eastern Studies. <https://archive.org/details/egyptsstrugglefo0000meit>
- Ministry of Foreign Affairs of the Russian Federation. (2015a). Russia's Foreign Minister Sergey Lavrov answers questions from readers of the newspaper Argumenty i Fakty. *The Ministry of Foreign Affairs of the Russian Federation*. [https://www.mid.ru/en/foreign\\_policy/news/1544529/](https://www.mid.ru/en/foreign_policy/news/1544529/)
- Ministry of Foreign Affairs of the Russian Federation. (2015b). Foreign Ministry's statement on Ukraine's constitutional process. [https://www.mid.ru/en/foreign\\_policy/news/1511944/](https://www.mid.ru/en/foreign_policy/news/1511944/)
- Ministry of Foreign Affairs of the Russian Federation. (2016). Foreign Minister Sergey Lavrov's remarks and answers to questions at a joint news conference following talks with French Minister of Foreign Affairs and International Development Jean-Marc Ayrault Moscow, April 19, 2016. *The Ministry of Foreign Affairs of the Russian Federation*. [https://www.mid.ru/en/press\\_service/minister\\_speeches/1527258/](https://www.mid.ru/en/press_service/minister_speeches/1527258/)
- NATO. (2025). NATO's response to Russia's invasion of Ukraine. *North Atlantic Treaty Organization*. [https://www.nato.int/cps/en/natohq/topics\\_192648.htm](https://www.nato.int/cps/en/natohq/topics_192648.htm)
- Neff, D. (1994). The Clinton Administration and UN Resolution 242 *Journal of Palestine Studies*, Vol.23 No. 2. *Institute for Palestine Studies*. <https://www.palestine-studies.org/en/node/39943>
- Nicole, S. G. (2018). Global media and the Middle East: Representation and geopolitics. *Global Media and Communication*, Volume 11 Issue 3. <https://journals.sagepub.com/toc/gmc/11/3>
- Niland, P. (2016). Making sense of Minsk: Decentralization, special status, and federalism. *Atlantic Council*. <https://www.atlanticcouncil.org/blogs/ukrainealert/making-sense-of-minsk-decentralization-special-status-and-federalism/>
- Odell, J. S. (2000). *Negotiating the world economy*. Cornell University Press.
- Office of the Historian, U.S. Department of State. (1974). *Document 112: Memorandum from Saunders to Kissinger, "Rabat Summit Conference" (October 30, 1974)*. In *Foreign Relations of the United States, 1969–1976, Volume XXVI, Arab-Israeli Dispute, 1974–1976*. <https://history.state.gov/historicaldocuments/frus1969-76v26/d112>

- Olivia. C (2024). Anatomy of a Crackdown: The Hong Kong National Security Law and Restrictions on Civil Society. *Center for Asian Law. Georgetown law*.  
[https://www.law.georgetown.edu/law-asia/wp-content/uploads/sites/31/2024/03/24\\_ASIAN\\_LAW\\_NGO\\_REPORT\\_FINAL.pdf](https://www.law.georgetown.edu/law-asia/wp-content/uploads/sites/31/2024/03/24_ASIAN_LAW_NGO_REPORT_FINAL.pdf)
- Orakhelashvili, A (2021) Political Life of Treaties: Indeterminacy, Interpretation and Political Consequences. *Chinese Journal of International Law, Volume 20, Issue 3, September 2021, Pages 545–560*. <https://academic.oup.com/chinesejil/article/20/3/545/6381515>
- Organization for Security and Co-operation in Europe (OSCE). (2014). Protocol on the results of consultations of the Trilateral Contact Group, signed in Minsk, 5 September 2014.  
<https://www.osce.org/home/123257>
- Organization for Security and Co-operation in Europe (OSCE). (2015). Package of measures for the implementation of the Minsk agreements. <https://www.osce.org/cio/140156>
- OSCE Special Monitoring Mission to Ukraine. (2022a,). Daily Report 41/2022.  
[https://www.osce.org/files/2022-02-22%20Daily%20Report\\_ENG.pdf?itok=63057](https://www.osce.org/files/2022-02-22%20Daily%20Report_ENG.pdf?itok=63057)
- OSCE Special Monitoring Mission to Ukraine. (2022b). Daily Report 39/2022.  
<https://www.osce.org/files/2022-02-19%20Daily%20Report.pdf?itok=95901>
- OSCE. (2015). Package of measures for the implementation of the Minsk agreements. UNIAN (English translation). <https://horlogedelinconscient.fr/wp-content/uploads/2020/09/Minsk-2-Full-text-UNIAN.pdf>
- Overholt, W. H. (2024). Hong Kong: The rise and fall of “One Country, Two Systems.” *Harvard Asia Center*. [https://ash.harvard.edu/wp-content/uploads/2024/02/overholt\\_hong\\_kong\\_paper\\_final.pdf](https://ash.harvard.edu/wp-content/uploads/2024/02/overholt_hong_kong_paper_final.pdf)
- Pehar, D. (2001). Use of ambiguity in peace agreements. *Croatian International Relations Review*, 7(24–25), 109–128. <https://www.diplomacy.edu/resource/use-of-ambiguities-in-peace-agreements/>
- People’s Daily. (2014). Central government affirms autonomy is granted by central leadership. *People’s Daily Online*. <https://en.people.cn/n/2014/0610/c90785-8739214.html>
- Philo, G., & Berry, M. (2004). Bad news from Israel: Media bias in covering the Israeli–Palestinian conflict. *Pluto Press*. [https://www.dissentmagazine.org/wp-content/files\\_mf/1389817406d3Brennan2.pdf](https://www.dissentmagazine.org/wp-content/files_mf/1389817406d3Brennan2.pdf)
- Poroshenko, P. (2015). Statement by H.E. Mr. Petro Poroshenko, President of Ukraine, at the general debate of the 70th session of the United Nations General Assembly. *United Nations*. <https://digitallibrary.un.org/record/807974?ln=en>
- Putin, V. (2021). Article by Vladimir Putin “On the Historical Unity of Russians and Ukrainians.” President of Russia. <http://en.kremlin.ru/events/president/news/66181>
- Quigley, J. (2005). The case for Palestine: An international law perspective. *Duke University Press*.
- Radio Free Europe/Radio Liberty (RFE/RL). Ukrainian Foreign Minister Dmytro Kuleba says no “special status as Russia is considering it.” *Radio Free Europe/Radio Liberty*.  
<https://www.rferl.org/a/ukraine-kuleba-special-status/31683203.html>
- Reuters. (2017). China says Joint Declaration no longer binding; Britain says still valid. *Reuters*.  
<https://www.reuters.com/article/world/china-says-sino-british-joint-declaration-on-hong-kong-no-longer-has-meaning-idUSKBN19L1J1/>
- Reuters. (2020). UK says China’s security law breaches Joint Declaration. *Reuters*.  
<https://www.reuters.com/article/world/uk-says-chinas-security-law-is-serious-violation-of-hong-kong-treaty-idUSKBN2425IG/>
- Reuters. (2021). Russia’s invasion of Ukraine at 'bit of a stalemate' – US intel official.  
<https://www.reuters.com/world/europe/putin-preparing-prolonged-war-ukraine-us-spy-chief-2022-05-10/>
- Reuters. (2022a). Missiles rain down around Ukraine. *Reuters*.  
<https://www.reuters.com/world/europe/putin-orders-military-operations-ukraine-demands-kyiv-forces-surrender-2022-02-24/>

- Reuters. (2022b). Ukraine's Kuleba and U.S. Blinken discuss OSCE mission to Ukraine. Reuters. <https://www.reuters.com/world/europe/ukraines-kuleba-us-blinken-discuss-osce-mission-ukraine-2022-02-14>
- Reuters. (2022). What are the Minsk agreements on the Ukraine conflict? Reuters. <https://www.reuters.com/world/europe/what-are-minsk-agreements-ukraine-conflict-2022-02-21/>
- RIA Novosti. (2015). Kiev violates Minsk agreements by refusing talks with DPR and LPR. RIA Novosti. <https://ria.ru/20150211/1047088914.html>
- Rosenne, M. (2008). Interpretation of UN Security Council Resolution 242: The building block of peacemaking. In D. Diker (Ed.), *Resolution 242: The building block of peacemaking* (pp. 21–27). Jerusalem Center for Public Affairs. <https://www.files.ethz.ch/isn/115624/resolution242.pdf>
- Rostow, W. W. (1967). Memorandum for the President: Main issues in a Middle East settlement [Memorandum]. In *Foreign relations of the United States, 1964–1968, Volume XIX: Arab–Israeli crisis and war, 1967*. U.S. Department of State. <https://history.state.gov/historicaldocuments/frus1964-68v19/d361>
- Šarčević, S. (2000). *New Approach to Legal Translation*. *Kluwer Law International*. <https://open.unive.it/hitrade/books/SarcevicLegal.pdf>
- Poon, W.-Y. (2008). The pitfalls of linguistic equivalence: The challenge for legal translation in Hong Kong. *Target: International Journal of Translation Studies*, 14(1), 85–104. *Hong Kong Metropolitan University*. <https://scholars.hkmu.edu.hk/en/publications/the-pitfalls-of-linguistic-equivalence-the-challenge-for-legal-tr>
- Savage, M. (2021). Hong Kong: UK accuses China of breaching joint declaration. *The Guardian*. <https://www.theguardian.com/politics/2021/mar/13/hong-kong-uk-accuses-china-of-breaching-joint-declaration>
- Searle, J. R. (1969). *Speech Acts: An Essay in the Philosophy of Language*. *Cambridge University Press*.
- Shelton, D. (1997). Reconcilable differences: The interpretation of multilingual treaties. *Hastings International and Comparative Law Review*, 20(3), 611–652.
- Soldatenki, M (2025). In the Shadow of the Minsk Agreements: Lessons for a Potential Ukraine–Russia Armistice. *Carnegie Endowment for International Peace*. <https://carnegieendowment.org/research/2025/02/ukraine-russia-ceasefire-security-agreement?lang=en>
- State Council. (2014). *The practice of the “One Country, Two Systems” policy in the Hong Kong Special Administrative Region [White paper]*. State Council Information Office. Retrieved from [https://english.www.gov.cn/archive/white\\_paper/2014/08/23/content\\_281474982986578.htm](https://english.www.gov.cn/archive/white_paper/2014/08/23/content_281474982986578.htm)
- TASS. (2015). Russian humanitarian convoys enter Donbas. *TASS*. <https://tass.com/world/781203>
- The China Quarterly. (1983). Rural society: Hong Kong's New Territories. *The China Quarterly*, 95, 480–490. <https://doi.org/10.1017/S0305741000023328>
- Tsang, S. (2007). *A Modern History of Hong Kong*. *I.B. Tauris*.
- Tse, J. K. H. (2015). The Umbrella Movement and its political consequences. *City University of Hong Kong*. [https://ink.library.smu.edu.sg/cgi/viewcontent.cgi?article=4387&context=soss\\_research](https://ink.library.smu.edu.sg/cgi/viewcontent.cgi?article=4387&context=soss_research)
- Tu, Y. (2020). *The question of 2047: Constitutional future under “One country, two systems.”* *Cambridge University Press*. <https://www.cambridge.org/core/journals/german-law-journal/article/question-of-2047-constitutional-fate-of-one-country-two-systems-in-hong-kong/63969CFD61A851FF6355ECD8AD29919C>
- U.S. Mission to OSCE. (2015). *Briefing on OSCE Permanent Council Meeting, Plenary 1071: Ukrainian Delegation Highlights Security Violations*.

- UK Parliament. (2020). Hong Kong: National Security Law and recent events (Research Briefing CBP-9318). *UK Parliament*. <https://researchbriefings.files.parliament.uk/documents/CBP-9318/CBP-9318.pdf>
- Ulmer, R. R., Sellnow, T. L., & Seeger, M. W. (2007). *Effective crisis communication: Moving from crisis to opportunity*. SAGE Publications.
- United Nations General Assembly (UNGA). (1970). Statement by the Non-Aligned Countries, Lusaka Summit (A/C.1/PV.1807).
- United Nations General Assembly (UNGA). (1972). Official Records of the 27th Session, Plenary Meetings.
- United Nations General Assembly (UNGA). (1974). Seventh anniversary of Security Council Resolution 242 (1967) [Verbatim record]. UNISPAL Archive. Retrieved from <https://www.un.org/unispal/document/auto-insert-180026/>
- United Nations General Assembly (UNGA). (1974a). Resolution 3236 (XXIX). [https://docs.un.org/en/A/RES/3236%20\(XXIX\)](https://docs.un.org/en/A/RES/3236%20(XXIX))
- United Nations General Assembly (UNGA). (1974b). Resolution 3237 (XXIX). [https://docs.un.org/en/a/res/3237\(xxix\)](https://docs.un.org/en/a/res/3237(xxix))
- United Nations General Assembly (UNGA). (2014). Resolution 68/262: Territorial integrity of Ukraine. <https://undocs.org/en/A/RES/68/262>
- United Nations Security Council (UNSC). (1967). [https://undocs.org/S/RES/242\(1967\)](https://undocs.org/S/RES/242(1967))
- United Nations Security Council (UNSC). (1967). Security Council Official Records. 1373rd Meeting: 9/10 November 1967. <https://www.securitycouncilreport.org/atf/cf/%7B65BF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/Chap%20VII%20SPV%201373.pdf>
- United Nations Security Council (UNSC). (1968). Provisional verbatim record of the 1721st meeting (S/PV.1721). [https://digitallibrary.un.org/record/15881/files/S\\_PV-1721-EN.pdf](https://digitallibrary.un.org/record/15881/files/S_PV-1721-EN.pdf)
- United Nations Security Council (UNSC). (1973). Resolution 338 (S/RES/338). <https://digitallibrary.un.org/record/93466?v=pdf>
- United Nations Security Council. (UNSC). (2015). Resolution 2202 (2015) [on the package of measures for the implementation of the Minsk Agreements] (S/RES/2202 (2015)). [https://www.securitycouncilreport.org/atf/cf/%7B65BF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/s\\_res\\_2202.pdf](https://www.securitycouncilreport.org/atf/cf/%7B65BF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/s_res_2202.pdf)
- United Nations. (1968). Yearbook of the United Nations 1968 (excerpt detailing Syria's refusal of Jarring). *United Nations Publications*.
- United Nations. (1969). Vienna Convention on the Law of Treaties. *United Nations Treaty Series*, 1155, 331. <https://treaties.un.org/doc/publication/unts/volume%201155/volume-1155-i-18232-english.pdf>
- United Nations. (1971). Report of the Secretary-General under General Assembly resolution 2252 (ES-V) and Security Council resolution 237 (1967).
- United Nations. (2024). Security Council 9556th meeting: Situation in Ukraine (SC/15588) [Press release]. <https://press.un.org/en/2024/sc15588.doc.htm>
- United States Department of State. (1967). Opening statement of the Honorable Dean Rusk. <https://history.state.gov/historicaldocuments/frus1964-68v19/d198>
- UPI Archives. (1991). Hong Kong poll shows little faith in China. UPI Archives. <https://www.upi.com/Archives/1991/06/30/Hong-Kong-poll-shows-little-faith-in-China/8805678254400/>
- Venice Commission. (2019). Opinion on the Law on Supporting the Functioning of the Ukrainian Language as the State Language (CDL-AD(2019)032). *Council of Europe*. [https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2019\)032-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2019)032-e)
- Verkhovna Rada of Ukraine. (2015). On amendments to Article 10 of the Law of Ukraine "On the Special Order of Local Self-Government in Certain Areas of Donetsk and Luhansk Regions" (Law No. 256-VIII). <https://zakon.rada.gov.ua/laws/show/256-19>

- Vienna Convention on the Law of Treaties (VCLT). (1969). *Article 33: Interpretation of treaties authenticated in two or more languages*. United Nations.  
[https://legal.un.org/ilc/texts/instruments/english/conventions/1\\_1\\_1969.pdf](https://legal.un.org/ilc/texts/instruments/english/conventions/1_1_1969.pdf)
- VOA. (2014). 港人英領館外示威促英國履行責任. *Voice of America*.  
<https://www.voacantonese.com/a/hongkong-activists-british-20141121/2530418.html>
- Waage, H. H., & Mørk, H. K. (2015). Mission Impossible: UN Special Representative Gunnar Jarring and His Quest for Peace in the Middle East. *The International History Review*, 38(4), 830–853. <https://doi.org/10.1080/07075332.2015.1091783>
- Wei, R., Burnham, P., & Kerr, P. (2024). Reassessing Thatcher’s foreign policy: The Sino-British Declaration 1984. *British Journal of Politics and International Relations*.  
<https://doi.org/10.1177/13691481231190502>
- Wesley-Smith, P. (1980). Unequal Treaty, 1898–1997: China, Great Britain and Hong Kong’s New Territories. *Oxford University Press*.
- Willetts, P. (1978). The Non-Aligned Movement: The Origins of a Third World Alliance. *London: Frances Pinter Publishers*.
- Wilson Center. (2017). The 1967 Six-Day War. <https://www.wilsoncenter.org/publication/the-1967-six-day-war>
- Wong, P. (2019). Sovereignty and autonomy: Political discourse during the drafting of the Joint Declaration. *Journal of Asian Studies*, 78(4), 498–517.
- World Bank. (2018). Ukraine economic update: April 2018. *Washington, DC: World Bank*.  
<https://thedocs.worldbank.org/en/doc/562071523347836199-0080022018/Ukraine-Economic-Update-April-2018-Ukr>
- World Trade Organization (WTO). (2001). European Communities – Anti-Dumping Duties on Imports of Cotton-Type Bed Linen from India, WT/DS141/AB/R, WT/DS141/R.  
[https://www.wto.org/english/tratop\\_e/dispu\\_e/cases\\_e/ds141\\_e.htm](https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds141_e.htm)
- Zartman, I. W. (1985). Ripe for resolution: Conflict and intervention in Africa. *Oxford University Press*.
- Zeifert, M., & Tobor, Z. (2022). Legal translation versus legal interpretation: A legal-theoretical perspective. *International Journal for the Semiotics of Law*, 35, 1671–1687.  
<https://doi.org/10.1007/s11196-021-09837-7>
- Zelizer, B. (2002). How bias shapes coverage: U.S. press and the Second Intifada. *University of Pennsylvania*. <https://scispace.com/pdf/how-bias-shapes-the-news-challenging-the-new-york-times-4ekfbmelcv.pdf>