

A global comparison of non-sovereign island territories: the search for ‘true equality’

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Abstract: For a great majority of former colonies, the outcome of decolonization was independence. Yet scattered across the globe, remnants of former colonial empires are still non-sovereign as part of larger metropolitan states. There is little drive for independence in these territories, virtually all of which are small island nations, also known as sub-national island jurisdictions (SNIJs). Why do so many former colonial territories choose to remain non-sovereign? In this paper we attempt to answer this question by conducting a global comparative study of non-sovereign jurisdictions. We start off by analyzing their present economic, social and political conditions, after which we assess local levels of (dis)content with the contemporary political status, and their articulation in postcolonial politics. We find that levels of discontent and frustration covary with the particular demographic, socio-economic and historical-cultural conditions of individual territories. While significant independence movements can be observed in only two or three jurisdictions, in virtually all cases there is profound dissatisfaction and frustration with the contemporary non-sovereign arrangement and its outcomes. Instead of achieving independence, the territories’ real struggle nowadays is for obtaining ‘true equality’ with the metropolis, as well as recognition of their distinct cultural identities.

Keywords: decolonization, equality, independence, islands, non-sovereign, sub-national island jurisdictions

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Introduction

In his book *Surpassing the Sovereign State* (2014), David Rezvani argues that a non-sovereign (or partially independent) status represents the best political arrangement for small island territories. On the basis of a global comparative analysis, Rezvani (2014, p. vii) demonstrates that partially independent territories ('PITs') "tend to be wealthier and more secure than their sovereign state counterparts." Similar arguments have been made by other scholars who seek explanations for the fact that many small island jurisdictions – the great majority of which are former colonies – opt to remain politically linked to a larger metropolitan power (Aldrich & Connell, 1998; Baldacchino, 2010; Chauvin, Clegg & Cousin, 2018; Clegg & Killingray, 2012; Clegg & Pantojas-García, 2009; Oostindie & Klinkers, 2003).

While the 'classic' notion of decolonization envisages the attainment of independence as the culmination of this process, the last small island nation to obtain independence and United Nations membership was Palau in 1994. Around 60 sub-national island jurisdictions (SNIJs) and other non-sovereign jurisdictions can presently be found around the globe, with the exact number varying depending on the specific criteria chosen. Thus Rezvani (2014, p. 12) lists 66, the CIA World Factbook (2018) lists 58, and we argue below for a total of 55. The fact that none of these jurisdictions have become independent in the last quarter of a century is a clear indication that these territories prefer a non-sovereign arrangement over the attainment of full independence, and that the various metropolitan states agree to, or at least accept, this choice.

But Rezvani notwithstanding, in territories around the world, non-sovereignty continues to create ambiguities, debates, and controversies. Lack of full autonomy, metropolitan domination and control, contentious colonial history, and cultural tensions create a situation in which citizens of these territories perceive non-sovereignty as a rationally pragmatic, but ideologically, culturally, and possibly even psychologically deeply unsatisfactory political outcome (Baldacchino & Hepburn, 2012; Corbin, 2012; Grydehøj, 2016a; Veenendaal, 2016).

While this article focuses on the perspectives of the non-sovereign jurisdictions, a word about metropolitan policies and perspectives is appropriate. Some 70 years ago, the United Nations (1960), in its Declaration on the Granting of Independence to Colonial Countries and Peoples, stated that "All people have the right to self-determination; by virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development." While this Resolution 1541 had sovereignty as a first option, 'free association' was explicitly defined as another legitimate outcome. A free choice for incorporation, integration, or some sort of association with the former metropolis has since also been considered an acceptable outcome of the process of decolonization (United Nations, 1960; Igarashi, 2002). This implies that, at present, no metropolitan state is in a position to unilaterally end the postcolonial relationship. Various metropolitan states may and indeed do differ, however, in the enthusiasm with which they embrace the resultant responsibilities and costs. This in turn affects the quality of the relationship and the way it is perceived in the non-sovereign jurisdictions.

We suggest that the ways in which non-sovereignty is evaluated by the overseas territories themselves is contingent upon five factors: geography, history, demography, economy (including the domain of ecology), and politics/constitution. Non-sovereignty is

undoubtedly appreciated differently in a culturally homogenous, politically stable, and economically prosperous territory like St. Pierre and Miquelon than in a heterogeneous, poor, and politically contested jurisdiction like New Caledonia. Several studies have explored the factors that may result in different appraisals of non-sovereign arrangements and, hence, in some cases in pro-independence activism (e.g. Baldacchino & Hepburn, 2012; Clegg, 2012a; Adler-Nissen & Gad, 2013). Building on these studies and our own previously published work, we present a comparative analysis of non-sovereign territories worldwide, in order to examine how non-sovereignty is evaluated from the perspective of the non-sovereign jurisdictions.

We start off by providing a concise overview of all non-sovereign territories worldwide, in the process arguing for a narrowing down of our total sample of 55 to 40, excluding both jurisdictions that do not have a colonial history (and hence no tradition of anticolonial sentiments) and territories that today most likely have no chance to move towards independence should they want so. Subsequently, we examine the conditions of the remaining non-sovereign jurisdictions following the five basic factors mentioned. We will then look at the appreciation of the non-sovereign status from the overseas territories' perspectives. In the conclusion, we summarize our findings and outline some potential future prospects and trends.

A caveat about our approach is appropriate here. Adam Grydehøj (2018) recently reminded us of the importance for island studies scholars to reflect upon their positionality. The authors of this article come from different backgrounds and scholarly traditions, contrasts which certainly resonated in the process of researching and writing this paper. We are not certain whether we should indeed see a binary opposition between metropolitan and Indigenous voices, as Grydehøj (2018, p. 10) seems to suggest. We do agree though, as will become clear, that it makes little sense to think of non-sovereignty exclusively in constitutional and political terms, leaving out emic perspectives. This is one reason why a discussion of the pursuit of 'true equality' runs through this entire article. We define this equality both in a material sense (standard of living, access to high-quality public services such as health and education) and in the domain of identity (being accepted as part of the metropolitan state and culture, while retaining the right to retain and celebrate local identities).

Status quo: basic factors

Geography

Non-sovereign jurisdictions can be found around the world, but the majority are clustered in specific world regions that correspond to the world's oceans and seas. Containing 18 non-sovereign jurisdictions, the Caribbean is the region that houses the largest number of such territories. Second is the Atlantic Ocean with 13 territories, followed by the Pacific with 11. Six non-sovereign jurisdictions can be found in the Indian Ocean, four in the Mediterranean, two on the Chinese coast, one in the Korea Strait (Jeju), one in the Arctic (Svalbard) and one in the Baltic Sea (Åland). These jurisdictions have political relationships with a total of 12 metropolitan powers, being the United Kingdom (15 non-sovereign territories), France (12), the Netherlands (6), the United States (5), Australia (3), New Zealand (3), Spain (3), China (2), Denmark (2), Portugal (2), South Korea (1), and Finland (1) and Norway (1). While some metropolitan states, such as Australia, France, the United Kingdom and the United States

have links with territories in multiple world regions, others maintain relations with territories in only one region.

The great majority of non-sovereign jurisdictions are located in non-moderate climate zones, mainly in tropical parts of the globe, but some others like Greenland, Svalbard and the Falkland Islands in extremely cold environments. Only a handful, such as Gibraltar and Jersey, are in (relatively) moderate zones, in or near to Europe. European migration history is the key here. In previous centuries, Europeans preferred to settle in large numbers in moderate climate zones, establishing what Alfred Crosby (2004, p. 2) called 'Neo-Europes'.

In terms of geographical characteristics, the great majority of non-sovereign jurisdictions are island units with a small population and a limited territorial size. Greenland, the Falkland Islands, French Guiana, New Caledonia, Svalbard, and the French Southern and Antarctic Lands (TAAF) are the only non-sovereign jurisdictions with land areas of over 10,000 km². Many of these latter territories are, however, very sparsely populated and have very low population densities. The remaining non-insular, non-sovereign jurisdictions are very small enclaves that are all located in the Mediterranean: Akrotiri and Dhekelia (on the island of Cyprus), Ceuta and Melilla (enclosed by Morocco), and Gibraltar (bordered by Spain) are on this list. French Guiana, a substantial territory on the South American continent, might be designated as insular in a metaphorical sense, as its inhabitants mainly live on the coastal strip facing the Atlantic coast, with a dense rainforest separating them from the rest of the South American continent.

While as indicated almost all non-sovereign jurisdictions are island units, differences exist with regard to the number of islands united within these jurisdictions. Some cases consist of only a single island (e.g. Anguilla, Aruba, Guam, Jersey, Mayotte, Niue), while others comprise a small number (e.g. Cayman Islands, St. Pierre and Miquelon, Tokelau, Wallis and Futuna) or a larger number of islands (e.g. Åland, British Virgin Islands, Faroe Islands, Northern Mariana Islands, the Turks and Caicos Islands). These geographical features have a considerable impact on these jurisdictions' opportunities and challenges, their actual functioning and hence the appraisal of non-sovereignty by the various parties involved, with multi-island jurisdictions facing recurrent challenges of inter-insular rivalries that may be more salient than contestations with the metropolitan state.

To summarize, with a few exceptions the world's non-sovereign jurisdictions are small and insular. While there may be no direct statistical correlation between either smallness or insularity and economic sustainability (Armstrong & Read, 2000; Easterly & Kraay, 2000), we argue that in all of the jurisdictions discussed in this article, an awareness of the vulnerabilities that come with their small size has kept them from seeking full sovereignty. This applies even to those territories that have quite sizable territories, such as French Guiana, Greenland, and Puerto Rico.

History

Without colonialism, most of the 55 non-sovereign territories scattered across the globe would have had an altogether different history and contemporary status. Expressions such as "Confetti of Empire" (Guillebaud, 1976) or "Last Colonies" (Aldrich & Connell, 1998) are not particularly considerate, but they do make the logical connection to colonization and especially to this last, never-ending phase of decolonization. Perhaps counterintuitively, in

these places colonialism was not followed by full decolonization and the complete severing of colonial ties, but rather by some sort of postcolonial relationship.

The picture is slightly more complicated though. A minority of these territories have never been formal colonies, but were rather acquired in European or Mediterranean wars waged centuries ago: the Channel Islands (13th Century), Ceuta (1668) and Gibraltar (1713) are cases in point. Other non-sovereign territories such as the Azores, the Canary Islands and Madeira were colonized in the earliest phase of European colonization, but as the native populations were annihilated and the islands were repopulated by metropolitans, they came to be perceived both by locals and metropolitans as integral – even if faraway and hence inevitably peripheral – parts of the metropolitan state. And what of uninhabited islands once discovered and sparsely settled by Europeans, such as Saint-Paul and Amsterdam, Crozet and Kerguelen, part of the French Southern and Antarctic Lands (TAAF) in the Indian Ocean? While their origins hark back to the broader history of European colonialism, they have no colonial past in the sense that most non-sovereign territories have: colonization, subjugation and/or annihilation of the native population, repopulation and development mainly by means of enslaved African and/or indentured Asian labor. Seeing that such territories do not really fit the ‘classical’ model of linkages between metropolitan states and non-sovereign jurisdictions that we examine in this paper, we omit all of these from the rest of our analysis.

This narrows our analysis to those non-sovereign territories where colonial history still matters much in the contemporary reality because of the legacies left behind. Local populations literally reflect this history. This is most dramatically the case in the non-sovereign Caribbean, where large majorities of local populations descend from enslaved Africans once brought to these places by European slavers. Here, colonialism simply meant slavery, exploitation, and racism. Only the American colonial presence in the Caribbean, specifically in the territories of Puerto Rico and the US Virgin Islands postdates the era of slavery: the former was wrangled from the Spanish around 1900, while the latter were literally bought from Denmark in 1917.

Colonialism left a complex and often painful legacy. African slavery was decisive to the development of the Caribbean colonies, but also in non-sovereign territories in the Indian Ocean such as La Réunion or Mayotte that, similarly, faced (re)population schemes involving ethnic differentiation and discrimination. In these territories however, immigrants came from a variety of places. In contrast, in most of the Pacific and particularly Polynesia, colonialism dates from a much later period, mostly did not involve mass immigration or the annihilation of the native population, and in this sense left a lesser mark on society, culture, and narratives of local identity (Firth, 1997). Even so, territories such as the Cook Islands, Guam, and French Polynesia do qualify as formerly colonial, and they are still included in the United Nations’ list of ‘non-self-governing territories’. If one day they decided to move towards full independence, they would probably find a willing ear – if not directly with an enthusiastic metropolis, then surely with the United Nations. For this reason, all of these territories remain within our sample.

But what are we to make of Hong Kong (formerly a British colony) and Macau (formerly a Portuguese colony), now both Special Administrative Regions of China? Formally, they share a typical colonial history with the great majority of non-sovereign territories. What sets them apart is the political reality that China, their new metropolis, has made it clear that their future lies within the People’s Republic, not in an indefinite prolongation of their

present special status (Wong & Xiao, 2018). Something similar goes for Jeju, a self-governing province of South Korea. While Jeju has a post-World War Two history of brutal South Korean repression, there is no external colonial legacy, nor a serious debate about sovereignty (Ryang, 2013; Rogers & Wenger, 2017). Arguably, Hong Kong, Macau and Jeju are the only former colonies in the entire group that will not be allowed a free choice about their future constitutional status. For this reason, we omit these three from the rest of our analysis as well.

This excursion into the realm of history has therefore resulted in a narrowing down of our original selection, leaving us with those non-sovereign territories that qualify as former colonies and whose present post-colonial status implies the possibility of opting out. This means that we have narrowed down our original 55 territories to a group of 40 (see Table 1 & Figure 1). Among this group, an important distinction can be made between former settler colonies and former exploitation colonies. In the first group, which includes the Falkland Islands, the Faroe Islands, and St. Pierre and Miquelon, the contemporary population is racially and culturally similar to the population of the metropolis. The relative absence of slavery, exploitation, and racism entails that the colonial legacy of these territories is much less traumatic than that of former exploitation colonies, resulting in a more positive attitude towards the continuation of a non-sovereign relationship with the former colonial power.

Table 1: Non-sovereign territories included in this analysis.

Nº	Name	Population	Size (km ²)	Region	Per capita/income (US\$)	Source/year
United States of America (3.8 million)						
1	Puerto Rico	3,474,200	9,104	CAR	28636	UN/2016
2	US Virgin Islands	103,600	346	CAR	36100	CIA/2013
3	American Samoa	54,300	199	PAC	13000	CIA/2013
4	Guam	161,800	544	PAC	30500	CIA/2013
5	Northern Mariana Islands	52,300	464	PAC	13300	CIA/2013
France (2.7 million)						
6	French Guiana	250,000	83,534	CAR	19024	INSEE/2015
7	Martinique	386,500	1,128	CAR	28680	INSEE/2015
8	Guadeloupe	404,000	1,705	CAR	25441	INSEE/2015
9	Saint-Martin	36,300	53	CAR	17640	INSEE/2010
10	Saint-Barthélemy	9,000	25	CAR	42840	CEROM/2010
11	Saint-Pierre et Miquelon	6,100	242	ATL	33960	IEDOM/2008
12	Mayotte	212,600	374	IND	10321	INSEE/2015
13	La Réunion	845,000	2,511	IND	25308	INSEE/2015
14	Wallis-et-Futuna	15,500	142	PAC	12120	IEOM/2005
15	French Polynesia	268,300	4,167	PAC	19335	UN/2016
16	New Caledonia	268,800	18,576	PAC	35196	IEOM/206
Kingdom of the Netherlands (313,200)						
17	Aruba	103,400	179	CAR	25444	UN/2016
18	Bonaire	17,400	294	CAR	21500	CBS/2015
19	St. Eustatius	4,000	21	CAR	26600	CBS/2015
20	St. Maarten	33,600	34	CAR	27116	UN/2016
21	Saba	2,000	13	CAR	24900	CBS/2015
22	Curaçao	152,800	444	CAR	15000	CIA/2004

United Kingdom (230,156)						
23	Anguilla	13,600	91	CAR	22861	UN/2016
24	British Virgin Islands	28,100	153	CAR	31677	UN/2016
25	Cayman Islands	56,700	264	CAR	63261	UN/2016
26	Turks and Caicos Islands	49,000	616	CAR	26291	UN/2016
27	Montserrat	4,900	102	CAR	12044	UN/2016
28	Pitcairn Islands	56	47	PAC	-	
29	Bermuda	64,200	53	ATL	99363	UN/2016
30	Falkland Islands	2,900	12,200	ATL	96200	CIA/2012
31	St. Helena, Ascension, Tristan da Cunha	7,700	394	ATL	7800	CIA/2009
Denmark (105,600)						
32	Faroe Islands	49,800	1,399	ATL	40000	CIA/2014
33	Greenland	55,800	2,166,086	ATL	37600	CIA/2015
Finland (29,000)						
34	Åland Islands	29,000	1,580	EUR	55000	CIA/2015
New Zealand (17,600)						
35	Cook Islands	15,000	240	PAC	12300	CIA/2010
36	Niue	1,200	260	PAC	5800	CIA/2005
37	Tokelau	1,400	10	PAC	1000	CIA/1993
Australia (4,900)						
38	Norfolk Island	2,200	35	PAC	-	
39	Christmas Island	2,100	135	IND	-	
40	Cocos (Keeling) Islands	600	14	IND	-	



Figure 1: Map of non-sovereign territories included in this analysis.

Demography

While most of the non-sovereign territories can be classified as small island jurisdictions, their population numbers vary considerably, ranging from a few dozen (Pitcairn) to almost 3.5 million (Puerto Rico). Indeed, most citizens of the remaining sample of non-sovereign territories are American. In order of demographic magnitude, the French territories (over 2.7 million inhabitants) are second, followed by the Dutch (310,000), British (just below 250,000), Danish (100,000), and Finnish (30,000) territories. The populations of the Australian and New Zealand territories are much smaller (Table 1).

As the only jurisdictions with more than half a million citizens, Puerto Rico and La Réunion are the only non-sovereign territories that would *not* qualify as microstates according to most scholarly and political categorizations (Veenendaal, 2014). This leads us to a conclusion similar to the one on geographical size: an awareness of the vulnerabilities that come with their small population size has prevented these jurisdictions from seeking full sovereignty.

Ecology and economy

The contribution of the non-sovereign territories to global biodiversity is considerable, and some of the larger territories such as French Guiana and Greenland are endowed with rich natural resources. Most territories are however relatively small, many are quite densely populated, and most are highly dependent on external support. In addition, particularly the islands located in tropical zones are highly vulnerable to global warming, rising sea levels and maritime degradation. Not only may this threaten the inhabitants' quality of life and in the longer run even the very existence of some of the islands, but there are also increasing risks for the tourism industry which is crucial to many of the territories' economies (Baver & Lynch, 2006; Gargominy & Boquet, 2013; Ferdinand, 2018). Especially the non-sovereign territories in the tropics are vulnerable to ecological degradation and global warming in the decades to come (Kelman, 2014). This will negatively impact their economic resources and in turn enhance their dependence on metropolitan support.

Across the board, but with appreciable differences among them, non-sovereign territories enjoy higher standards of living than do independent states of similar size and endowments in the same areas (Table 1; McElroy & Parry, 2012; World Bank, 2017). Their constitutional status is the major explanatory factor here. At the same time, standards of living tend to be clearly below the metropolitan average. While the latter observation may result in political mobilization for more metropolitan support, the former is a strong and apparently decisive argument for great majorities in the non-sovereign territories against the pursuit of independence (Veenendaal & Oostindie, 2017). This is not to say that the populations of the non-sovereign territories value their status only because of economic advantages, but certainly this factor is crucial.

Largely as a result of its size, Puerto Rico is the only American non-sovereign territory with a strongly diversified economy, but in recent years the island experienced a deep economic crisis, compounded by the devastating Hurricane Maria in 2017. The other American territories largely rely on services, tourism, fishing, and US military activity. All of the American jurisdictions rely heavily on US federal funds (US Office of Insular Affairs, 2017). Standards of living differ considerably, but overall the contrast with the mainland US states is glaring, and unemployment figures are high. Particularly in the case of Puerto Rico,

this has led to massive migration throughout the post-War decades, and today the Puerto Rican communities in the US outnumber the insular population.

The French overseas territories' economies are mainly based on tourism and the agricultural production of export commodities such as banana, sugar and rum in Martinique, Guadeloupe and La Reunion. Some territories have developed specific economic sectors, like nickel mining in New Caledonia and the European space center in French Guiana. Overall, while standards of living in the French territories are much higher than in surrounding sovereign insular states, their economies perform worse than in mainland France, with far higher levels of unemployment and poverty (INSEE, 2017; Brasset & Le Public, 2014, p. 1; Schneider, 2017).

All Dutch non-sovereign territories are located in the Caribbean, and much of what has been said of the French non-sovereign territories applies here as well. All Dutch islands have per capita incomes far exceeding Caribbean and Latin American averages. While the economies of the largest two, Aruba and Curaçao, were long dependent on their refineries processing oil from nearby Venezuela, today the major industry on all islands is tourism, backed up by other tertiary sector activities, including financial services (Alberts, 2016). In common with virtually all Caribbean states, the Dutch Caribbean faces serious challenges with respect to drug trafficking and money laundering undermining the official economy. Metropolitan financial transfers are structural and indispensable for maintaining the present standards of living, particularly on the smallest islands. Incidental transfers included a €1.7 billion debt cancellation in 2010 and a €0.5 billion pledge to help rebuild the three Northern Caribbean islands after the disastrous 2017 Hurricane Irma. Dutch transfers to the three smallest Caribbean islands amount to the highest per capita transfers (Prinsen, 2018, p. 151).

While the British territories are scattered across the globe, they share a small size, and their economies are mainly services driven, with tourism and in some Caribbean islands also a significant offshore finance sector. The Falkland Islands in contrast sustain a considerable fisheries industry. The 1999 and 2012 Foreign and Commonwealth White Papers expressed the British government's responsibility for the advancement of the British Overseas Territories (Clegg, 2013). Again, average standards of living are mostly below the metropolitan per capita income, while there are also wide discrepancies within the category of British Overseas Territories. British financial transfers are limited.

The Nordic non-sovereign territories have diverse economic bases. Per capita incomes in these territories are high (Karlsson, 2009). The fishing industry is extremely important in Greenland and the Faroe Islands, yet both Danish territories receive ample economic support from Copenhagen. The Finnish territory of Åland has a very prosperous economy, mainly as a result of a successful shipping industry and the presence of several high-tech companies that provide employment to the population.

The three Australian jurisdictions rely on small but quite successful tourism sectors, sustaining a relatively high GDP per capita income. By contrast, the geographically isolated territories of New Zealand have a comparatively low level of economic development. All these territories receive ample development funds from metropolitan states.

The conclusion we may draw from this section is more ambiguous than from the previous ones. There is little doubt that their constitutional status privileges non-sovereign territories over sovereign island states, partly because of direct metropolitan support. On the other hand, in virtually all non-sovereign jurisdictions per capita incomes are lower and

unemployment is higher than in their metropolitan state. This apparently does not inspire pro-independence struggles, arguably because the metropolitan state is seen as indispensable for confronting economic and increasingly also ecological challenges. But as we will see, an awareness of this discrepancy does inspire ambitions for more equality.

Constitutional and political arrangements

While non-sovereignty characterizes the entire group of territories reviewed here, there are significant differences in constitutional arrangements, varying from full political integration to semi-federal arrangements or a more or less unaltered colonial status. The level of meaningful autonomy therefore varies considerably between territories (Baldacchino, 2010; Rezvani, 2014). Yet in all cases, matters pertaining to foreign affairs and defense are handled by the metropolitan state, and in most arrangements there is considerable room for metropolitan intervention in financial and legal matters – if not preventive, than at least as soon as the metropolitan state concludes that there are serious problems in a particular territory. In all of these aspects therefore, the limits of whatever autonomy has been achieved are clearly and sometimes painfully delineated.

Two of the American territories (Northern Mariana Islands and Puerto Rico) are Commonwealths with considerable domestic autonomy, while the other three are Unincorporated Territories. Puerto Rico falls under the direct authority of the Presidential Office and is treated administratively as if it were an American state. Puerto Rico, American Samoa, and the Northern Mariana Islands have internal self-government under a local constitution, while American Samoa and the US Virgin Islands remain under the organic act approved by the US Congress, which determines their legislation. People born in US overseas territories are US citizens, apart from American Samoans, who are considered US nationals, meaning they have limited political rights. While the residents of the territories enjoy most of the rights of mainland American citizens, they cannot vote in US presidential elections and have no representatives in Congress, apart from a non-voting member in the House of Representatives.

The French overseas territories follow two different constitutional arrangements. On the one hand, the Departments and Overseas Regions of the *Outre-mer* (DROM) (comprised of Martinique, Guadeloupe, Guiana, La Réunion, and Mayotte) follow the principle of 'legislative identity'. Any laws or regulations that are passed in France are readily applicable there, with the possibility of adaptation on specific issues at the request of local or national representatives (Faberon & Ziller, 2007). On the other hand, the Collectivities of *Outre-mer* (COM) follow the principle of a special legislative regime. These territories have been granted the possibility of a larger legislative and political autonomy based on their own interests. However, the French State still oversees all matters related to nationality, public liberty, foreign policy, currency, defense, police and maritime security, and even university teaching. Since 1998, New Caledonia has a unique status that offers the possibility of a gradual transition to independence. A referendum on the subject in November 2018 disclosed however that 59% of voters oppose a constitutional separation from France. As they are incorporated into the Republic, the French territories are also part of the European Union.

The decolonization of the Dutch Caribbean was halfway completed with the 1954 *Statuut* or Charter granting autonomy in domestic affairs to Suriname and the six-island entity of the Netherlands Antilles within the Kingdom of the Netherlands. In 1975, Suriname

obtained full independence, and in 1986 Aruba seceded from the Netherlands Antilles, becoming a Kingdom country on its own. In 2010, the Netherlands Antilles were dissolved. Since then, the Kingdom of the Netherlands includes four constituent countries, Aruba, Curaçao St. Maarten, and the Netherlands itself. The three least-populated islands have been incorporated into the Netherlands as ‘public entities’, basically overseas municipalities (Veenendaal, 2015). The four countries have autonomy in domestic affairs, while the Kingdom government is responsible for foreign affairs, defense and the guaranteeing of democracy and good governance. As the Dutch dominate the Kingdom government and moreover dispose of far greater means, a striking imbalance characterizes this arrangement, in spite of solemn claims of equality and reciprocity (Oostindie & Klinkers, 2003; Oostindie, 2013). Moreover, over the past decades, the Dutch government has clearly worked towards getting a firmer grip on Dutch Caribbean governance, pointing at recurring integrity and financial issues while at the same time shying away from investing in sectors such as education or welfare in the autonomous Caribbean territories. In contrast to the French DOMs, the Caribbean islands of the Kingdom of the Netherlands are not an integral part of the European Union, as they have the status of an EU ‘overseas country or territory’ (OCT).

The constitutional arrangements made by the British government for the UK overseas territories are neither the French type of full integration, nor the Dutch, Nordic or Australian and New Zealand models of some sort of local autonomy. There is limited local autonomy, and locally elected governments are responsible for insular affairs, but in each territory a British governor acting on behalf of the British government has the right to intervene in local politics and even to oust a locally elected administration altogether on suspicions of corrupt government, as occurred in the Turks and Caicos Islands in 2009. In this respect, the British models seem more reminiscent of colonialism than all the other arrangements. Among the British territories, only Gibraltar is an integral part of the European Union.

The Danish Faroe Islands and Greenland are both governed under Home Rule arrangements, providing for internal self-government. The autonomy of Greenland was enhanced to Self-Rule in 2009, following a referendum, but matters relating to defense and foreign affairs remain based on Danish legislation. While Denmark is a member state of the European Union, its two territories are not; the Faroes never had any ties to the EU, and Greenland exited from the Union in 1985. The Faroe Islands and Greenland both have two elected representatives in the Danish Parliament. The Finnish Åland islands also have considerable internal autonomy and are an associated member of the Nordic Council.

The three Australian jurisdictions are ‘External Territories’, and while Christmas Island and the Cocos Islands are administered by the Department of Infrastructure and Regional Development, Norfolk Island is ruled as part of the Australian state of New South Wales. The latter island is the only Australian territory that has experience with self-government, as Norfolk was ruled by a directly elected legislative assembly between 1979 and 2015. However, in 2010 the local administration voiced its intention to abolish self-government in return for financial support from the Australian government to relieve the territory’s significant debt. In spite of a 2015 referendum resulting in an overwhelming majority for retaining internal self-government, later that year the Australian government passed a law abolishing self-government in Norfolk.

The overseas territories of New Zealand are among the most autonomous in our sample. Cook Islands and Niue are both Associated States, and in practice almost function as

sovereign countries with full internal self-government. Even though neither territory is a member of the United Nations, their independence in foreign relations is recognized by the UN. New Zealand acts on behalf of its Associated States in matters relating to defense and foreign affairs, but only on the basis of mutual consent and consultation. Tokelau, by contrast, is ruled as a Territory, and referendums on Free Association in 2006 and 2007 narrowly failed to reach the two-thirds supermajority required for a status change.

In conclusion, there is a great variety of constitutional arrangements, varying from full integration into the metropolitan state as in the French case to various forms of local autonomy in all other cases. There have been skirmishes over the delineation and meaning of autonomy in several cases, particularly where a metropolitan state such as the Netherlands has been actively reclaiming previously delegated administrative powers – inevitably leading to accusations of ‘recolonization’. Even so, as we will discuss more extensively in following sections, the major struggle seems to be about something else: social justice and real equality.

The appreciation of non-sovereignty

Before we discuss local appreciations of non-sovereignty, it is useful to point to the broader international dimension. As stated above, freely chosen non-sovereignty is an internationally accepted outcome of any decolonization process. The UN’s present list of non-self-governing territories comprises ten British Overseas Territories (including the disputed Falklands); three American territories (the US Virgin Islands, American Samoa and Guam); French Polynesia, French New Caledonia; Tokelau (New Zealand); as well as the disputed territory of the Western Sahara which we will not include in our analysis. According to Chapter XI of the United Nations’ Charter, the UK, the US, France and New Zealand are required to promote the well-being of these “territories whose people have not yet reached a full measure of self-government” and to provide regular reports about these places.

Most non-sovereign territories however are not represented in this list, including Puerto Rico, the other French territories, the Dutch Caribbean and the Australian and Danish dependencies. Their respective metropolitan powers are not obliged to report to the United Nations about the conditions of, and their policies for, their dependent territories. The rationale is that the latter category has achieved a satisfactory level of self-government, but obviously the UN list as it is also reflects diplomatic skirmishes which have not ended. There have thus been several attempts by the UN’s Special Committee on Decolonization to take the US to task about Puerto Rico, and dissatisfied representatives of non-listed non-sovereign territories have unsuccessfully attempted to bring their case for the UN’s Special Committee on Decolonization. But whether non-sovereign territories are on the United Nations’ list or not, the bottom line is that for better or for worse, they can only negotiate with their metropolis about the terms and effects of their relationship, not through international institutions.

All metropolitan states involved are either firmly positive about continuing postcolonial relations with former colonies, or have accepted that they cannot unilaterally end these relations against the will of overseas populations that are firmly opposed to a definitive break up. Mainly for geopolitical reasons, the United States and France have demonstrated an unequivocal willingness to continue these arrangements. British policies have been somewhat mixed in this respect. While the United Kingdom was happy to retreat from the Caribbean altogether and has only grudgingly accepted its continued presence in this region, it has

demonstrated more enthusiasm elsewhere for geopolitical reasons – including of course open warfare in the case of the Falklands/Malvinas (1982). The Dutch are only present in the Caribbean as the islands, in contrast to Suriname, have continued to refuse the ‘gift’ of sovereignty – responsibilities and obligations rather than positive interests define the Dutch presence. By and large the same might be observed for the policies of the remaining metropolitan states, though perhaps some with some differences for Denmark and New Zealand. In general one might argue that all metropolitan states may perceive some strategic benefit in the continuing postcolonial arrangements, if only because they enlarge their global geopolitical status. But then again, this strategic benefit comes at a financial price, and may be defined as a collateral of a constitutional bond that they would not strive for today if there would not have been this particular colonial history.

Unlike in colonial times, however, any possible changes in constitutional relationships are not only contingent upon metropolitan preference, but equally upon the political ambitions and public opinions of the former colonies (Prinsen & Blaise, 2017). And the latter are not directed towards full independence, but rather towards either maintaining the status quo or enhancing autonomy (Prinsen, 2018, 146). Either way, in many of these territories there is a call for ‘true equality’, including metropolitan respect for local cultures. Frustration about a lack of true equality has resulted in widespread political activism, and will likely continue to do so.

American territories

The US acquired its various overseas territories for geopolitical reasons, and continues to value these possessions because of this, even if Puerto Rico – by far the largest and most populous of these islands – may increasingly be perceived as a liability rather than an asset. Even in Puerto Rico, with its painful Spanish and American colonial history, the independence movement has never become a prominent political force. In the most recent referendum relating to the island’s political status in 2012, only 5.5% of voters chose independence, while 61.2% favoured the island officially obtaining full US statehood. The case of Puerto Rico reveals US indolence in addressing the concerns and requests of insular areas, and after the referendum the US government did not take any steps to satisfy Puerto Rican requests for US statehood. The island’s deep economic recession fostered debate about its future political status, with the ‘Puerto Rican side’ affirming that the island is administered in colonial fashion by an exploitative metropole (Gonzalez, 2017), while the ‘US side’ holds a corrupt and inefficient Puerto Rican government responsible for the huge debt (Neate, 2015). Plagued by a crippled economy and devastation from Hurricane Maria in the summer of 2017, relations between Puerto Rico and the United States have only become more tense, fuelled by a strong sense that “America has let Puerto Rico down” (*Economist*, 2018). It is unclear whether recent developments will change preferences among the population, 300,000 of whom have migrated to the continental United States since Hurricane Maria. Puerto Rican politicians have strengthened their calls for full equality and representation in the metropolis, which theoretically might be realized by the attainment of full US statehood.

The four smaller American overseas territories have no serious pro-independence movements. The small size of the islands, the absence of local political parties outside of the US Democratic/Republican party system, and the crucial economic support of the US has blocked the emergence of any pro-independence political projects. Efforts in these territories

– such as in Guam in the 1970s (Kiste, 2006) and recently American Samoa – to clarify and ameliorate their current ambiguous positions have been in vain, if only because of the obvious lack of American commitment to significant change.

French territories

The French *Outre-mer* presented and presents considerable military, scientific and economic advantages for France's position in the world. Located in three oceans, the *Outre-mer* enables France to have military facilities all around the world (Ferdinand, 2018). France became a nuclear power by testing its nuclear weapons in formerly colonized Algeria and French Polynesia, which still bear the environmental and health costs of this “radiance” (Hecht, 2014). Moreover, since 1965, the Guianese space center in Kourou has been the center of operation for all space launches of France and the European Space Agency (ESA), operated in part by *Ariane Espace*. Finally, France currently has the second-largest Exclusive Economic zone in the world (11 million m²), 97% of which is located in the *Outre-mer*. This not only indicates the rich biodiversity of the *Outre-mer* (it holds 80% of France's national biodiversity) but also points to economic opportunities in terms of fishery resources and seabed exploration (Gargominy & Boquet, 2013; MOM, 2016).

Since the mid-1970s, there had been no referendum on possible independence in the French *Outre-mer* (Idriss, 2018). The 2018 referendum in New Caledonia turned out to confirm that full sovereignty is not in the cards, not even in this French territory with the strongest pro-independence movement in the entire *Outre-mer*. In the last 40 years, 11 other referenda solely involved questions on autonomy and local administration *within* France. Overall poll results confirm a consistent wish in the *Outre-mer* to remain part of France (Zenou, 2009; IFOP, 2015).

At the same time, the *Outre-mer* has a long history of criticizing the French state and of social protest, as highlighted over the past decade in the French Caribbean, Mayotte and New Caledonia (*Le Monde*, 2017; William et al., 2012). Acknowledging that the social equality promised by the 1946 departmentalization law is still not achieved, in 2017 France enacted a law aiming for “real equality” for the *Outre-mer*, bridging the social and infrastructure gap between the overseas territories and mainland France.

French overseas territories have also nurtured criticism of the French republicanism that equated the political association of the French State to cultural assimilation. Initial claims for independence turned to pleas for more autonomy within France while asserting a strong cultural identity (Gordien, 2018; Dumont, 2010). A crucial element is the struggle for recognition of the history of slavery as integral to the narrative of the French nation, resulting in a law recognizing slavery as a crime against humanity, which in 2001 was defended by former Guyanese deputy and former minister of Justice Christiane Taubira (Chivallon, 2012).

Referring to the continuing social divides between mainland France and the *Outre-mer*, to discriminatory practices by the French state, and to the marginalization of their cultural identities, many of its inhabitants still feel they are considered “second class citizens” of France (L'Etat Outre-mer, 2016; Lemerrier et al., 2014; Larcher, 2014). Hence the claim for a “more perfect” equality with the mainland, as well as the demand for recognition of distinct cultural identities (Bonilla, 2015).

The Dutch Caribbean

Since the 1970s, there has been a considerable number of plebiscites, elections with the political status as a major issue, and countless surveys on issues relating to the relations between the Dutch Caribbean islands and the Netherlands, as well as the relations between the islands themselves, all of which, including the most recent ones, have confirmed the choice of non-sovereignty. The results of two linked surveys (1998, 2015) point to a familiar theme in postcolonial non-sovereign societies: the painful trade-off between head and heart (Veenendaal & Oostindie, 2017). Dutch Caribbean citizens express a strong preference for a continuation of the present non-sovereign constitutional relations, even if they are well aware that the (European) Netherlands ultimately decides their fate – at least, as long as they do not opt for full independence. When asked why, island inhabitants consistently offer a range of pragmatic arguments: financial support; security issues such as territorial integrity and the safeguarding of democracy and human rights; the Dutch passport and hence the right of abode in the Netherlands; and, remarkably, Dutch administrative supervision of locally elected administrations (Veenendaal & Oostindie, 2017).

At the same time, the survey outcomes demonstrate a considerable rise between 1998 and 2015 of feelings of resentment about the nature and impact of the increasingly strong Dutch presence, ranging from economic concerns to issues of culture and identity (Veenendaal & Oostindie, 2017). This indicates that while, from a pragmatic, rational perspective, non-sovereignty may be thought of as an acceptable or even desirable political arrangement, this outcome may be strongly and increasingly resented from a more political, ideological and also psychological point of view.

Another survey conducted in the three Dutch Caribbean municipalities in 2015 as part of the evaluation process of the new constitutional arrangements suggested a similar ambivalence (Spies et al., 2015). This is all the more remarkable as after the constitutional reform of 2010, the Dutch government made considerable investments in these islands, amounting to €10,000 per capita annually, easily ten times as much as in the autonomous Dutch Caribbean countries. This points to a paradox with worrying consequences for Dutch policymakers: financial support might be needed, but money alone is not enough and might even stir up local frustration. The various surveys disclosed widespread feelings of disenfranchisement and relative deprivation, summed up in angry accusations of ‘recolonization’, ‘modern slavery’ and ‘apartheid’.

Over the past decade the Dutch government also intervened directly in the governance of its three presumably partner countries in the Caribbean, either because of financial (Aruba) or democratic (Curaçao) issues, or both (St. Maarten). These Dutch policies reflect a change in approach since the early 1990s: if independence is no longer an option, then the Caribbean governments will be made to conform to Dutch standards of good governance (Oostindie & Klinkers, 2003). The increased Dutch presence, both in governance matters and through the rise of mass tourism, has not translated into a pro-independence movement, but does elicit recurring complaints about ‘recolonization’ and has translated into the rise of anti-Dutch populism in politics.

British Overseas Territories

The British Overseas Territories (BOTs) vary considerably in the extent to which they are economically and financially dependent on London, and attitudes towards non-sovereignty

and enduring constitutional relations with the United Kingdom appear to be contingent upon both levels of economic development and demographic characteristics (Clegg, 2013). In BOTs that can be considered settler territories and that are still mainly populated by white Europeans such as Pitcairn, the Falkland Islands and to some extent St. Helena, Ascension and Tristan da Cunha, support for ties with the United Kingdom remains unequivocally high. Identity-related issues hardly play a role here, because the population continues to feel staunchly British, even if there might occasionally be tensions as a result of unwanted metropolitan interference in local affairs.

The size and characteristics of the local populations also play a role in local appraisals of the non-sovereign status. In the least-populated BOTs, there has never been much opposition to the UK. In the more populous territories, and especially those with significant non-Western populations and/or historical legacies of oppression and slavery, resistance towards the UK has been greater. British interference in allegedly weak or even corrupt local governance, such as in Bermuda and the Turks and Caicos Islands, may have provoked tension, but even here only minorities strive for independence (Clegg, 2012b). In all, while it is unlikely that any of the BOTs will proceed towards independence in the coming years, certainly in the larger territories resentment may be expected to continue, arguing for more support and/or less interference from the United Kingdom.

Faroe Islands, Greenland, and Åland

The economies of the Faroe Islands and Greenland obtain clear advantages from their non-sovereign status. Standards of living are similar to Denmark, the economies have been growing in the past 15 years (apart from some years after the economic crisis of 2008), and the population is growing or stable. Unlike in most other non-sovereign territories, significant claims for independence do exist in both Danish territories. The first referendum in the Faroe Islands about independence, held in 1946, resulted in a narrow majority for independence. The Danish government at the time did not accept the result and the outcome was overturned in a subsequent consultation in 1948. Since 1991, Faroese home rule has been strengthened (Ackren & Lindstrom, 2012). A status referendum was planned for May 2001, but was cancelled after the Danish government threatened to discontinue economic support. However, the results of a 2018 referendum on a draft constitution for the Islands have enhanced opportunities for self-determination and may even pave the way for future independence of the Faroe Islands.

Greenland acquired the Faroese model of home rule in 1979, and enforced its autonomous power in the decision of leaving the EEC in 1985. In the 1990s, a wave of autonomist sentiment swept the island, and in 2009 home rule was extended to self-rule. But as in the case of the Faroe Islands, the Greenlandic economy presently cannot survive without extensive Danish support, frustrating the pursuit of full independence. The exploitation of natural resources could be a way to improve revenues and sustain self-rule, and given that there is a general political consensus in Greenland in favor of eventual independence, debate about constitutional status currently focuses more on economic self-sufficiency (Grydehøj, 2016a). To complicate matters, stepping up the exploitation of natural resources might have serious environmental consequences, on top of the grave social problems already plaguing Greenland (Hersher, 2016; Kleist, 2010; McSmith, 2008).

The rather open approach of the Danish government towards the territories' requests for autonomy leaves the door open for full independence. Yet not only economic, but also administrative relations block this choice. As Grydehøj (2016b) remarks, Denmark created an institutional framework based on metropolitan institutions in Greenland which is too complex for Greenland's size and society and only reinforces dependence on Denmark. The same might be said for the Faroe Islands. Thus while local autonomy is higher than ever before, postcolonial relations are still characterized by Danish hegemony and, inevitably, local ambivalence and resentment.

Australian and New Zealand territories

Unsurprisingly in view of their diminutive size, the three Australian non-sovereign territories do not have significant independence movements. However, given their lack of internal autonomy and the dominating way in which the Australian federal government has governed these islands, there is considerable dissatisfaction with the contemporary status among island inhabitants, particularly on Norfolk where internal self-government was revoked by Australia in 2015, a measure widely seen as "recolonization" (Gonschor, 2017). In vain so far, local opposition has called on the UN to restore the local autonomy and democracy of Norfolk, and endeavors are underway to have the island inscribed on the UN's list of non-self-governing territories (<http://www.norfolkschoice.com/>).

Located just to the south of Java, Christmas Island has seen the arrival of numerous refugees and migrants via Indonesia, and in 2002 the Australian government established an Immigration Reception and Processing Centre on the island, notorious for its dismal conditions (Firth, 2016). The local population has not been vocal about these matters or more broadly about its constitutional ties with Australia. Meanwhile, the main political issue in the neighboring Cocos Islands has been the divide between the European (Christian) and Malay (Muslim) population segments. These issues, rather than constitutional status, dominate local politics in this Australian dependency.

The New Zealand territories enjoy the most autonomous status of all non-sovereign polities surveyed in this paper. The relationship between Cook Islands, Niue, and New Zealand is regarded as a free association, from which each partner may withdraw at any time (Aldrich & Connell, 1998, p. 55). The extensive internal sovereignty and the voluntary nature of the association with New Zealand assuages potential calls for independence in these territories, which might really be enjoying "the best of both worlds" (Baldacchino, 2006, p. 49). The situation is slightly more complicated for Tokelau, where New Zealand retains considerable decision-making power. The option of free association received the support of almost 65% of voters in a 2007 self-determination referendum, just below the required two-thirds supermajority (Hooper, 2008).

Discussion

The present paper has aimed to provide a broad overview of non-sovereign territories around the world, and has sought to provide insights into these jurisdictions' motivations to retain relationships with former colonial powers. In virtually all territories, it seems unlikely that there will be any substantial constitutional changes in the sense of a transition to full

sovereignty anytime soon – and this includes the most likely candidates for this step, the Danish dependencies of Greenland and the Faroe Islands and French New Caledonia.

Overall, the various metropolitan states are either not interested, or not in a position to enforce a change of status quo, the UN remains largely aloof, and mainly for pragmatic reasons, the non-sovereign jurisdictions themselves are not interested in independence. This means that the relevant debate for the decades to come lies elsewhere, namely in the pursuit of the non-sovereign jurisdictions of both more equality in a material sense and at the same time a perception of sufficient space for some degree of both political and cultural autonomy.

Why only small minorities and few political parties in this wide array of non-sovereign territories claim to opt for full sovereignty is easily explained by reference to the factors discussed above. An awareness of the vulnerability that comes with smallness, the result of geography and demography combined, makes it very unlikely that most of these territories will never be viable as independent states, at least in the present world order. Vast majorities of their populations realize this, and prefer the benefits of non-sovereignty instead: economic support, protection of territorial integrity, democracy and human rights, and the passport of and right of abode in the metropolis. Among the factors that we have discussed, the difference in colonial legacies (and in particular the distinction between former settler colonies and former exploitation colonies) has the greatest effect on attitudes towards non-sovereignty. Yet even in the territories with the most brutal and traumatic colonial experiences (i.e. those in the Caribbean), clear majorities of the population continue to prefer non-sovereignty to full independence.

In contrast to the wealth of data available on opinions about the postcolonial arrangements among the electorates of the non-sovereign territories, there is no systematic quantitative research available on attitudes among the metropolitan populations. Perhaps we might conclude that this metropolitan mood ranges all the way from a longing to end these postcolonial bonds through indifference and lukewarm support to genuine enthusiasm. Metropolitan politicians, in turn, whatever their personal preferences, simply need to accept the fact that these postcolonial bonds are here to stay, whether they like it or not. In contrast, most people in the non-sovereign territories strongly feel that precisely because of colonial history, they have the right to remain as long as they want within whatever postcolonial arrangement that has been defined. Moreover, they express their rights within this constellation as the right of ‘true equality’, as it has been defined in the case of the French *Outre-mer*. The debate therefore is no longer about transitions towards full sovereignty, but rather about striking a reasonable balance between metropolitan interests and means and the desires of the non-sovereign territories. This debate about ‘true equality’ is a difficult one, bearing in mind the divergent means, interests and perspectives of the parties involved.

What are the factors that will determine this process and its outcomes? All else being equal – including the grim prospects of climate change (see however Kelman, 2019) – the dependence of the non-sovereign territories on their metropolitan states will most likely increase. This begs the question of whether the latter will rise to the challenge of pursuing ‘true equality’. Here of course it does help that in all cases, metropolitan states can easily afford serious support for these small-scale territories. But this is not to say that they will always act accordingly: the recent American negligence of hurricane-struck Puerto Rico is a painful reminder that the metropolis sometimes shirks what many would regard as its responsibility towards former colonies. It is unlikely that the paradigm of ‘true equality’, which harks back to ideas about postcolonial solidarity and perhaps even reparation, will be upheld in all cases.

The non-sovereign territories will continue to expect support from their former colonial states for overcoming the limited economic and administrative viability inherent to their small scale and geographical isolation. This might involve striving for closer institutional links, which in most cases will mean moving towards the French model of full integration. This, in turn, would require a willingness on both sides to revise extant constitutional arrangements, plus a metropolitan preparedness to raise financial support. The latter condition in particular seems to be at odds with the rising tide of chauvinist populism in many metropolitan states. Moreover, the recent Dutch Caribbean experience underpins the notion that this sort of change may evoke deep resentment about assumed ‘recolonization’.

Two decades ago, Aldrich and Connell (1998, p. 24) rightly suggested that “status issues in the territories are never fully resolved.” To various degrees, there is a longing for change in the non-sovereign territories, defined either as more metropolitan support, more political and cultural autonomy, or both. In this regard, judging from past experience, the outcome of both more support and more political autonomy seems rather unlikely to us: if metropolitan states are willing to raise financial support at all, this is invariably done by demanding more political control over purportedly inefficient, incompetent or even corrupt local administrations in return. Given this awkward choice, citizens and politicians in the non-sovereign territories alike have opted time and again for the pragmatic choice of retaining indispensable aid at the cost of political autonomy.

It is a matter of debate whether this trade-off will be upheld and how it will continue to be sought for in the non-sovereign territories. In a recent article, Gerard Prinsen (2018) offers a very optimistic analysis of developments across the global category of former European colonies that are now non-sovereign jurisdictions. His argument, which in a sense confirms Rezvani’s (2014) equally positive argument quoted in the introduction of this article, is that these jurisdictions have been remarkably successful in getting the best out of their constitutional arrangements. Prinsen substantiates this argument by referring to their assumed success in altering the specificities of these arrangements to better serve their needs, to bend the rules of association to their own optimal advantage, to ensure a constant and growing flow of metropolitan transfers, and to build up an international diplomatic presence that clearly goes beyond the original constitutional parameters. While the evidence presented by Prinsen is solid and actually coincides to a large degree with our findings, we do question whether this is the entire story, and particularly whether the ‘success’ Prinsen ascribes to the agile politicians in the non-sovereign territories is really that representative both for what is actually happening and for what politicians and the electorate actually make of the circumstances. Bearing in mind the bitter complaints and genuine fear of ‘recolonization’ and/or being left behind in many of these territories, we argue that the conclusion that these postcolonial relationships are being “redefined on – mostly – islanders’ terms” (Prinsen, 2018, p. 158) is stretching the argument too far.

Certainly non-sovereign territories will continue striving to get the best out of their postcolonial arrangements. Pragmatic benefit and hence ‘true equality’ represent one dimension of that struggle, while greater cultural autonomy and respect for local cultures grounded in a delicate colonial history represent the other. This indeed is what we observe from Greenland to Martinique – but not at all in places such as the Falkland Islands/Malvinas or St. Pierre and Miquelon, with their metropolitan majorities. We may even suggest that the demand of respect for local cultures has become the Plan B for communities that have suffered

from colonialism and its legacies but that at the same time, for pragmatic reasons, have decided against full independence. It seems likely that in the coming decades, alongside ecological and economic challenges, these ideological and cultural issues will continue to dominate the agenda. And the debate will also be played out in the metropolitan states, as by now substantial numbers of the populations of the non-sovereign territories have settled there. Whatever the outcome of these debates, it seems clear that in these former colonial territories, the once evident polarity between sovereignty and non-sovereignty is becoming decreasingly relevant, as the real issue is the struggle for social justice and true equality, both materially and culturally.

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