Political Opportunities, Resource Constraints, and Policy Advocacy of Environmental NGOs in China

Forthcoming at *Public Administration*

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Acknowledgment:
An earlier version of this article was presented at the Symposium on “Reform and Transition in Public Administration Theory and Practice in Greater China” at the University of Hong Kong, February, 2010. The authors would like to thank anonymous reviewers and the editors for helpful comments on earlier versions of the article. Research for the article was supported in part by the Departmental Research Fund for New Academic Staff (Project No. 4-ZZ8A) of Department of Management and Marketing, the Hong Kong Polytechnic University and a Faculty Research Grant of the US-China Institute, University of Southern California.
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Abstract

Drawing on political opportunity and resource dependency theories, this paper traces the development of 28 environmental NGOs (eNGOs) in China and examines the political and institutional factors that have constrained or facilitated these organizations’ policy advocacy activities. The paper shows that political structural changes have created greater opportunities for eNGOs’ policy advocacy, and eNGOs with better financial resources and connections to the party-state system are more capable of utilizing these opportunities to enhance their policy advocacy capacity. Yet party-state connections may in turn constrain the types of policy advocacy pursued by these eNGOs.
INTRODUCTION

A well-functioning civil society is one of the key forces for enhancing government accountability and democratizing public governance (Huntington 1991; Putnam et al. 1993; Hadenius and Uggla 1996; Berman 1997; Inglehart 1997; Diamond 1999; Anheier and Salamon 2006). In turn, democratic institutions such as freedom of assembly and open elections, together with other supporting policies such as a tax-exempt status for nonprofits, are essential for the growth of civil society organizations. Brian O’Connell argued that ‘a vibrant civil society is most likely to thrive in a vibrant democracy and vice versa’ (O’Connell 2000, p. 477). His observation highlights the difficulties of civil society development in countries that lack supportive political institutions. This is especially true for China whose authoritarian system lacks a well-developed legislative framework and institutional channels for citizen participation in public policy and administration (Lo and Leung 2000).

As key players in China’s civil society, non-governmental organizations (NGOs) have drawn increasing academic attention in the last two decades (White et al. 1996; Chan 1997; Metzger 1998; Saich 2000; Howell 2004). Numerous empirical studies have examined the development of NGOs in various fields, such as foster care (Shang 2002; Shang and Wu 2003), environmental protection (Ho 2001 and 2007), trade unions (White et al. 1996), HIV/AIDS prevention (Wu et al. 2007; Peersman et al. 2009), disaster relief
(Teets 2009), and urban neighborhood communities (He 2009; Heberer 2009). These studies show some evidence of a growing NGO sector in contemporary China; yet Chinese NGOs are still constrained by their limited organizational capacity, especially in relation to policy advocacy.

Emerging since the early 1990s, environmental NGOs (eNGOs) are among the most frequently studied NGOs in China (Ho 2001; Economy 2004; Schwartz 2004; Yang 2004; Yang 2005; Cooper 2006; Ru and Ortolano 2009; Wu 2009). In China, civic eNGOs are operated by private citizens and are grassroots oriented, and they differ from other types of eNGOs, such as government organized NGOs (GO-NGOs), student environmental groups affiliated with universities/schools, and foreign/international eNGOs with operations in China. According to two national surveys conducted by the All China Environmental Federation, the total number of Chinese eNGOs increased from 2768 by the end of year 2005 to 3539 by October 2008, and the total number of civic eNGOs almost doubled between 2005 and 2008 (Cui 2008).

Unlike their counterparts in western countries, Chinese civic eNGOs have in general been less involved in public policy advocacy and large-scale social movements. Moreover, unlike a few other domestic civic groups that have attempted to challenge the authoritarian system, Chinese eNGOs have largely adopted a non-confrontational stance toward it (Ho 2001 and 2007). They have in general limited organizational capacity and interest in policy advocacy (Lu 2007). Many important environmental issues, such as those related to local environmental victims, have largely been ignored by eNGOs. Most eNGOs also lack extensive grassroots support, and many, especially the larger ones, were founded
mainly with financial support provided by overseas foundations, which tend to avoid politically sensitive activities (Ho 2007; Turner 2003; Economy 2004; Yang 2005). Yet there have been signs in the past few years, especially after the tragic earthquake in Sichuan in 2008, that some eNGOs have become more capable in mobilizing grassroots support for their programs and engaging the media and, to a limited extent, government authorities in policy discussions through various formal and informal channels (Teets 2009).

The development of eNGOs’ policy advocacy activities thus provides a unique window to examine the dynamics between political changes and civil society development in China. Yet few existing studies trace these dynamics over time. Moreover, most studies focus primarily on eNGOs in specific regions, predominantly Beijing and a few other places. Another weakness of existing studies is their limited connections to standard social science theories. While these studies have been enriched by data collected from field trips, individual interviews, and personal reflections, few scholars have attempted to use existing theories of political science or organizational studies to examine the development of NGOs and civil society in China over time.

In this paper, we present an empirical study on the development of policy advocacy among China’s civic environmental eNGOs. Our research is based on two rounds of interviews. The first round of interviews was conducted with 28 eNGOs between 2003 and 2005. In that study (Tang and Zhan 2008), we found that socio-economic transformations, the accompanying environmental problems, and a partial retreat of the totalitarian party-state have created conditions for the emergence of eNGOs in China. Specifically, we
identified the non-oppositional role of Chinese eNGOs in the public policy process and their primary focus on environmental education and other non-political activities. To some extent, many civic eNGOs, especially those with strong connections to local communities, had been successful in ‘expressing their interests, exchanging information, and achieving collective goals’ (Diamond 1999) in the environmental arena. Yet due to a lack of solid societal support, a heavy reliance on international funding, and various political constraints, eNGOs had been less successful in attempts ‘to make demands on the state, to improve the structure and functioning of the state, and to hold state officials accountable’ (Diamond 1999).

Given the rapidly changing social, economic, and political landscapes in the past decade, have there been changes in opportunities for increased policy advocacy for eNGOs since our previous study? Which types of eNGOs have been more capable of utilizing new advocacy opportunities? Have eNGOs adopted new advocacy strategies? In this paper, we address these questions by (1) drawing on concepts derived from the political opportunity and resource dependency literature, and (2) analyzing data we collected in 2009 and 2010 on the same set of eNGOs we studied back in 2003-2005.

In the latest round of data collection, we were able to conduct follow-up interviews with some, but not all, of the 28 eNGOs we studied in the previous round. Based on data obtained from these interviews and other secondary sources, we found that political structural changes have given eNGOs greater opportunities for policy advocacy, and eNGOs with better financial resources and political connections to the party-state system are more capable of utilizing these opportunities to enhance their policy advocacy capacity.
Yet party-state connections may in turn constrain the types of policy advocacy pursued by these eNGOs.

In the following sections, we first develop a framework of analysis that connects concepts from political opportunity and resource dependency theories to scholarly observations on recent political and social developments in China. The framework helps assess how broader political and social developments in recent years may have impacted the growth of eNGOs in China. We then explain our data collection and research methods for addressing issues raised in our framework. Next we present the empirical findings, and conclude by discussing the significance of the findings and directions for future research.

POLITICAL OPPORTUNITIES, ORGANIZATIONAL RESOURCES, AND POLICY ADVOCACY

Changes in Political Opportunities

As posited by political opportunity theory, organizations seek to take advantage of opportunities created by political changes (Meyer and Staggenborg 1996). Social movement organizations, in particular, seek to exploit opportunities resulting from changes in institutional structures and informal power relations, of which several dimensions are especially relevant: increasing openness of the political process, unstable alignments and conflicts among political elites, and the government’s decreased capacity and propensity for political repression (Tarrow 1994).

During the 1980s and 1990s, for example, NGOs and civil society organizations took advantage of several political opportunities—especially the opening of the political
process and the political system’s decreased capacity and propensity for political oppression—and acted to promote the transformation of many authoritarian regimes (Kitschelt 1986; Tang and Tang 1997 and 1999; Kim 2000; Lim and Tang 2002). In recent years, the Chinese central government’s concerns for social stability, or in official terms ‘a harmonious society’, have encouraged government authorities at various levels to be more supportive of NGOs as a vehicle for helping disadvantaged groups and for reducing social conflicts, creating a more favorable context for eNGOs to play a more active role in China’s environmental policy.

Despite these positive signs, scholars differ in their assessments of the limits of these political changes. Pei Minxin, for example, has raised doubts on the Chinese Communist Party’s willingness to share political power and to initiate genuine political reform (Pei 1998 and 2006). Others note that the party-state apparatus had regularly interfered with the development of civil society organizations (Ma 2002). Yet, as Johnson (2003) indicates, the role of the state in China’s public life has declined in recent years, and the government cannot simply be labeled as an authoritarian regime with no space for dissenting voices or voluntary organizations (Ho 2007). Heurlin (2010) argues that the Chinese government’s policy towards NGOs has moved from exclusion to corporatism since the initiation of economic reform. Under some circumstances, party-state leaders have felt compelled to relax the extensive political control of society and to tolerate some types of voluntary actions by citizens and NGOs (Zhou 1993). The authoritarian state is gradually loosening its firm grip on many aspects of society for a number of reasons.
First, along with China’s open-door reform and the rise of a market economy, state-society relations have undergone significant changes. Chinese society has become more pluralistic, with its people having more diversified policy preferences and being less likely to be unquestionably supportive of every government policy (Tang 2001; Mertha 2009). As argued by Huntington (1968), for transitioning societies to maintain political order, the political system needs to create institutional channels for widespread public participation. China’s transitional context has created opportunities for the emergence of civic NGOs that represent diversified public preferences and work as intermediaries between citizens and the state. Recent decades have witnessed the rise of civic organizations outside the control of the party-state system, including civic groups established in the cyber space (Yang 2003a and 2003b), private neighborhood associations (Heberer 2009), and foreign NGOs in China (Hsia and White 2002). Instead of simply commandeering society, the Chinese state now has to ‘negotiate’ with society in many circumstances (Saich 2000), partially reflecting the gradual erosion of authoritarianism as well as the regime’s resilience to adapt to new political challenges (Nathan 2003). As argued by Ho (2007), the semi-authoritarian political system in China both restricts and facilitates the embedded development of civil society in recent years.

Second, as a result of the gradual decentralization of political and administrative authorities, increasing conflicts have emerged between different levels of governments and between different administrative divisions (Qian and Weingast 1996 and 1997; Cai and Treisman 2007). These structural conflicts within the party-state system have created many opportunities for NGOs to participate in policy making and implementation. The
central and local governments, for example, differ significantly in their policy priorities, with the former promulgating many environmental regulations and targets while the latter being concerned primarily with local economic development issues (Tang et al. 2003; Lo and Tang 2006). Within each level of government, both central and local, conflicts have also emerged between environmental protection agencies and other administrative divisions, especially those representing economic and land use interests (Lieberthal 1997; Lo and Tang 2006). The great demand for more effective environmental protection has made it necessary in many circumstances to involve eNGOs in the policy process. For instance, the central government, especially the Ministry of Environmental Protection, has begun to encourage, though limitedly, voluntary actions by citizens and eNGOs as watchdogs of local governments and business firms against major pollution activities.

Third, the Chinese government has faced increasingly limited administrative resources that are necessary to implement all policies or to provide social services (O’Brien and Li 1999; Ma 2002; Pei 2006). The relative scarcity of administrative resources has led the Chinese government to relax its extensive control of civic organizations and created opportunities for their growth. Recent studies, for example, have identified the importance of the nonprofit sector in urban social service delivery (Tang and Lo 2009) and self-organized groups in China’s local governance (Tsai 2007). Numerous well-functioning eNGOs in China have never legally registered with the government, a signal that the Chinese government has not fully enforced its rules of social organization registration. Thus, though varying from time to time, Chinese civil society organizations can enjoy some organizational autonomy and political space. Certainly, the political
bottom line has always been clear: political opposition against the central government and especially the Communist Party can never be tolerated.

Overall, China’s political system has been moving towards a more fragmented, but also resilient, authoritarian style since the initiation of market-oriented economic reform (Lieberthal and Oksenberg 1988; Lieberthal 1992; Nathan 2003; Lemaa and Rubyb 2007; Mertha 2009), and such a setting has created more political opportunities and social space for eNGOs to play a more active role in shaping public policy formulation and implementation (Xie and Heijden 2010). Some eNGOs have taken advantage of the conflicts between the central and local governments; some have also taken advantage of legislative changes that instituted both public participation requirements for environmental impact assessment and limited measures for governmental transparency.

During our first round of interviews in 2003-5, we found that similar to Peter Ho’s (Ho 2001) observation, leaders of civic eNGOs lacked both the will and the opportunity to openly confront the central government (Tang and Zhan, 2008). Yet with the expansion of public participation channels in the past few years, Chinese eNGOs could begin to take advantage of conflicts between the central and local governments, and those between local governments and local residents. Moreover, the expansion of the media and the increasing popularity of the internet have also created more channels for eNGOs to appeal for direct support from the grassroots public and to engage in policy debates. These developments have provided eNGOs with political opportunities to engage in policy advocacy and political actions.

Organizational Resources
Resource dependency theory (McCarthy and Zald 1977; Pfeffer and Salancik 1978) argues that organizations need resources—funding, people, information, and recognition—from the outside world to survive and grow. Governments and foundations that provide NGOs with critical resources and networking opportunities can potentially impact their agendas and programs (Saidel 1991; Snow 1992; Delfin and Tang 2007). Dowie (1995), for example, argues that through the grant conditions and the implicit expectations they imposed on their NGO grantees, mainstream foundations in the United States may steer their NGO grantees to less radical and more conservative social agendas. The theory has been applied extensively to examine the development of nonprofit organizations in western contexts (Heimovics et al. 1993; Froelich 1999; Guo and Acar 2005; Delfin and Tang 2007).

In the context of China, obtaining sufficient financial and human resources has been a major challenge for civil society organizations (Schwartz 2004; Zhang and Baum 2004). Compared with their western counterparts, NGOs in China face stricter legal and administrative barriers, which may affect their ability to obtain many kinds of resources. For example, the most preferable registration status for eNGOs in China is ‘social organizations with tax-exemption status’, but in every local jurisdiction only one social organization may obtain such a registration status in the environmental protection area. In order to register with the Ministry of Civil Affairs for that status, a NGO must also find a sponsoring organization that is either a governmental agency or a government-affiliated organization. Thus many NGOs in China need to register as private non-profit organizations or corporations, both of which face higher tax liabilities/rates. Non-
registration is an option for many NGOs; yet this status limits their capacity for building public trust, social acceptance, fundraising and personnel recruitment, and eventually policy advocacy.

As noted in our earlier study (Tang and Zhan 2008), Chinese civic eNGOs have for many years relied on funding from foreign organizations, such as international foundations, foreign governments, and multi-national corporations. Most of these funding sources, especially those that have operations in China, try to avoid creating any political controversies; thus most of their funding has been directed to politically neutral projects, such as environmental education, species protection, conferences, etc. This political preference of donors constitutes another external resource constraint of eNGOs in China.

Despite the continuing restrictions imposed by the government, Chinese eNGOs have in recent years increased access to more diversified sources of funding than before, including voluntary donations from foundations and businesses as well as grants and contracts from governments. For example, in 2004, a group of successful business leaders established the Society of Entrepreneurs and Ecology in Beijing seeking to provide grants for civic eNGOs. With five to six million graduates leaving college each year, eNGOs have also become less constrained by a lack of volunteers and staff. Moreover, informal social connections (guanxi) between organizational leaders and the party-state establishment can also be key resources for eNGOs to draw on to influence policy making and implementation, and advance their organizational missions (Swanson et al. 2001). From the perspective of resource dependency theory, these external resources may also affect the type of activities, including policy advocacy, pursued by eNGOs.
Connecting Political Opportunities and Resource Dependency to Policy Advocacy

To examine how political opportunities and resource dependency affect eNGO policy advocacy, we adopt a classification originally developed by Larry Diamond. In his widely cited book *Developing Democracy: Toward Consolidation* (1999), Diamond identifies six types of activities that NGOs may engage in: 1. ‘to express their interests, passions, and ideas; 2. to exchange information; 3. to achieve collective goals; 4. to make demands on the state; 5. to improve the structure and functioning of the state; and 6. to hold state officials accountable’ (Diamond 1999, p. 221). Diamond argues that the more civil society organizations engage in activities further down the list, the more they can contribute to the development of civic community and democratization. In recent years, Diamond’s classification has been widely used to study civil society development and democratization in many countries, including Japan (Hirata 2002), Ethiopia (Teshome 2009), Vietnam (Wischermann 2010), and Asian societies (Porio 2002). In our previous study, we used Diamond’s classification and reported that most of the Chinese eNGOs we studied had limited their programs to type 1 to 3 activities, which can be termed as ‘nonpolitical activities’; and only a few had limited engagement in type 4 to 6 activities such as helping pollution victims and challenging local firms, which can be termed as ‘political activities’ (Tang and Zhan 2008).

In this research, we treat eNGOs that focus primarily on type 4 to 6 activities as policy advocacy groups. When eNGOs are engaged in these activities, they have to interact with governments in an intensive or even confrontational way, which is inevitably political in China. Given the transformations of the underlying political and institutional
constraints, the main conjecture of our research is that overall eNGOs in China have increased their willingness and abilities in their engagement in type 4 to 6 political activities. Furthermore, those that have increased engagement in political activities are (1) those that have secured more stable and diversified financial and human resources, and (2) those whose leaders have more extensive connections to the party-state system.

DATA COLLECTION AND RESEARCH METHODS
The first round of data collection was conducted from August 2003 to May 2005. We originally contacted around 50 eNGOs in China based on information we collected from the internet and public documents. We were able to interview leaders from 28 civic eNGOs, among which 10 were Beijing-based, and the remaining 18 were located in 14 provincial-level jurisdictions, including Chongqing City, Fujian Province, Guangdong Province, Hebei Province, Henan Province, Hubei Province, Hunan Province, Jiangsu Province, Liaoning Province, Shandong Province, Sichuan Province, Xinjiang Uyghur Autonomous Region, Yunnan Province, and Zhejiang Province. These interviews were conducted through various methods, including face-to-face talks, phone calls, and email communications. Although the original sample was not randomly selected, it covers more than half of China’s provincial level jurisdictions, representing a greater geographical diversity in comparison with most other studies.

Between December 2009 and August 2010, we attempted to collect information on the original 28 civic eNGOs and conducted a second-round of interviews with them. Four of the original 28 eNGOs were no longer in operation (A03, A07, B05, B07, and the
coding is based on time sequence). We sent email messages or placed phone calls to contact the remaining 24 eNGOs and were able to interview officials from 11 of these 24 eNGOs. In the summer of 2010, we visited Beijing and Chengdu and had face-to-face conversations with officials of three among the 11 eNGOs. We were unable to conduct a second interview on 13 of the 24 eNGOs. One eNGO explicitly declined our interview invitation, citing a lack of time. The other 12 eNGOs did not respond to our invitations. However, we were able to collect relevant information on them from other sources such as their organizational websites and the *China Development Brief* which regularly provides information on NGOs in China.

In the two rounds of data collection, we used semi-structured interviews. Questions included organizational registration status, organizational activities, human resources, financial resources, relationships with other NGOs and governmental agencies, and challenges to organizational development. The interview results were supplemented by documents from other sources, such as the organization’s annual statements posted online, third-party research reports, etc. Data collected in the two rounds of interviews and from multiple other sources enables us to examine how Chinese eNGOs have developed in the past five to six years.

In our latest round of data collection, we paid special attention to the eNGOs’ policy advocacy and collective petition activities, which were relatively rare before 2005, but have been increasing in recent years. In western societies, civil society organizations, especially eNGOs, have had a long tradition of being leaders in policy advocacy and broader social movements (Sabatier 1988; Minkoff 1997; Fox 2001). In China, however,
collective petitions and protests by individuals and civil society organizations can risk being considered as political subversion. Although Chinese eNGOs might be committed to the environmental cause, most had been disinclined to engage in overt policy advocacy when organizational conditions and political environments remained unfavorable. Yet in the past few years, some eNGOs appeared to have increased their involvement in policy advocacy.

**EMPIRICAL RESULTS**

**Operational and Registration Status**

Organizational registration is a major administrative tool used by the Chinese government to control the growth and activities of NGOs. Among the 28 civic eNGOs examined in the first round, 24 of them are still active now, and four of them have ceased operation, representing an 86 percent survival rate. Among the four non-active eNGOs, two are Beijing-based and two are local ones. One Beijing-based eNGO merged with another poverty reduction NGO in 2006; another Beijing-based eNGO appears to have ceased operation before 2009; and both of them had legal registration status when they were interviewed in the first round. Among the two local eNGOs, one with legal registration status as social organization ceased operation in 2009. The registration of this organization was canceled by the local Bureau of Civil Affairs in July 2009, and the announcement was posted online. Another eNGO, a web-based group without registration, ceased operation before 2009, and its original website is no longer accessible.
During the period, there has been no significant change in the procedural requirement for registration with the government. As shown in Table 1, most eNGOs in this sample have been able to maintain their registration status. One Beijing-based eNGO’s registration status changed from ‘corporation’ to ‘private nonprofit organization’, and one local eNGO’s registration status changed from ‘corporation’ to ‘social organization’. Yet several other eNGOs reported difficulties for registration renewal. One Beijing-based eNGO leader, for example, said that he had to find a new sponsoring organization when the previous one was disqualified by the Ministry of Civil Affairs (Interview with an official of B09, January 2010). A local eNGO lost its sponsorship from a government-affiliated organization and was unable to find a new sponsor; yet it has been able to continue its active operation without legal registration (Interview with an official of B14, January 2010). Another Beijing-based eNGO was registered as a business corporation before 2005, but later it chose to maintain a non-registration status and has encountered no trouble (Interview with an official of B20, January 2010). Yet despite these continuing difficulties, most Chinese eNGOs as reported in this sample have not encountered significant interventions from the government regarding registration issues.

Table 1 about here

**Organizational Activities**

In our first round of interviews, we found that most eNGOs tended to focus on activities such as education and conservation projects that were considered as politically
non-controversial (Interviews with officials of A01&A02&A06 in 2003). We also found that informal channels such as personal connections with government officials and the media were the primary channels for eNGOs to influence policy making. This observation is consistent with Nathan’s argument in the early 2000s that the regime utilized a few citizen participation channels, such as individual complaints or media exposure, to enhance its political legitimacy, but it did not encourage group-based public inputs (Nathan 2003).

In the past five to six years, the government has taken steps to develop official channels for individual and group-based inputs into policy processes. For example, the Environmental Impact Assessment Law and Government Information Disclosure Act have open more official channels for such inputs, and increasingly eNGOs are actively citing these laws to justify their actions against local governments and polluting firms. These changes show that the Chinese government has gradually realized the utility of some involvement of non-government entities—businesses, individual citizens, and NGOs—in various environmental protection efforts.

That said, the amount of space for political action should not be overstated. One example is the increasing internet censorship from the Chinese government. During our first round of interviews, most eNGOs were able to maintain active websites or online forums. In recent years, however, the Chinese government has strengthened its control over the internet, and a few eNGOs’ websites are no longer accessible, possibly reflecting some degrees of self or imposed censorship. Moreover, the Chinese government has tightened its control on civil society organizations that work on politically sensitive issues or directly challenge governmental authority. A more extensively reported case was the
closure in recent years of several NGOs working on human rights issues. For example, *Gongmeng*, a Beijing-based human rights NGO established by several lawyers in Beijing, was closed by the government on tax evasion charges.

Despite increased restrictions on some aspects, the overall political and institutional environments have provided more space for NGO advocacy. In the current sample, several eNGOs have moved beyond their traditional focus on environmental education and conservation projects (type 1 to 3 activities in Diamond’s classification), and have become more engaged in environmental policy advocacy and other political actions (type 4 to 6 activities as defined by Diamond). Among the 24 active eNGOs, 18 eNGOs are still primarily engaged in environmental education and conservation projects (type 1 to 3 activities), although they have made some progress in terms of policy advocacy. The other six have transformed into policy advocacy groups, and now they are primarily engaged in political actions ‘to make demands on the state, to improve the structure and functioning of the state, and to hold state officials accountable’ (Table 2).

As mentioned earlier, type 1 to 3 activities are non-political in nature, while type 4 to 6 activities are political. We used this classification to examine eNGOs’ organizational activities. Among the six eNGOs identified as advocacy groups, four are Beijing-based and two are outside Beijing. Three Beijing-based eNGOs have significantly shifted towards a more active involvement in policy advocacy, and in recent years they have worked as
leaders in many collective campaigns related to specific environmental policy issues. This analysis is based on content analysis of organizational websites and annual reports of A01, A02 and A06. We also use other sources to collect documents related to collective campaigns among eNGOs in China.

Table 3 highlights examples of such collective campaigns in the recent five to six years. The three Beijing-based eNGOs were leaders of these eight collective campaigns. The number of participating eNGOs in these campaigns ranged from three to 56, often involving individual environmentalists and local eNGOs. In several of these campaigns, open letters were used to express collective opinions on key environmental issues—including calls for more stringent environmental law enforcement by the Ministry of Environmental Protection, calls for better environmental information disclosure by governmental agencies, requests for public hearing procedures in environmental impact assessment, written comments to the Chinese Supreme Court for judicial rulemaking, calls for public attention to energy saving and climate changes, etc. (for more details, see Table 3). These campaigns were extensively reported by the mass media in China. In a few cases, confrontational tactics were used by these eNGOs, and these tactics did not significantly impact their development. In 2005, for example, when the EIA process for a park project at Yuanming Yuan in Beijing proceeded without public participation, the three Beijing-based eNGOs criticized Beijing’s local authority for a lack of public participation and asked for intervention from the State Environmental Protection Administration (SEPA). After the involvement of SEPA, public hearings were conducted and the EIA report was revised. In another open letter addressed to Asia Pulp & Paper Group, one of
the largest paper and pulp companies in the world, six eNGOs asked this firm to disclose fully the pollution data of its local firm in Jiangsu Province in previous years. The coalition also asked the Ministry of Environmental Protection to temporarily postpone the approval of the firm’s initial public offering (IPO) in the Shanghai Stock Exchange Market.

Overall, when conducting type 4 to 6 activities, these eNGOs have utilized institutional channels—legal, administrative, and political—to formally engage the state and ensure that governmental agencies and business firms be more environmentally accountable, similar to commonly used strategies by western eNGOs when engaging the state (Ju and Tang 2011).

Table 3 about here

Three other eNGOs have also participated in a few of these collective campaigns. In addition, they have also conducted activities that can be categorized as type 4 to 6 activities. One local eNGO clearly defines itself as a policy advocacy organization, and it collaborated with many other eNGOs to oppose the construction of hydropower stations in southwestern China that might cause significant ecological degradation. Their collective efforts successfully persuaded the central government to postpone the project. In addition to collective efforts in policy advocacy, participation in lawmaking and local elections has also been used as a way for policy engagement. One Beijing-based environmental law NGO has actively participated in environmental lawmaking at the national level. In the past ten years, it has provided legal assistance for 135 lawsuits by pollution victims in 24
provinces, and many of these lawsuits were against local polluting firms and local environmental protection bureaus (organizational report of A11, January 2010.). One local eNGO leader participated in a local election and served one term (three years) as a village head (Interview with an official of B08, January 2010). This elected leader implemented an initiative to build an ecological village, and closed a few local polluting firms. This leader, however, lost the reelection for a second term due to strong opposition from local firms. As reported by this eNGO leader, local polluting firms have become more powerful, and many owners of these polluting firms have also obtained prestigious positions in provincial or national legislative bodies, making it more difficult to monitor them and ensure their compliance.

For the 18 eNGOs that are not categorized as policy advocacy groups, most of them focus primarily on environmental education, endangered species protection, and conservation projects in either Beijing or other localities. Yet most of them have participated in some collective campaigns led by other eNGOs. For example, among these 18 eNGOs, 16 of them have participated as co-signers at least once in the eight collective campaigns listed in Table 3.

**Organizational Resources**

In our previous study, we noted that most eNGOs, especially those with higher reliance on international funding, were disinclined to engage in politically sensitive activities (Tang and Zhan 2008). This situation has gradually changed. On the one hand, there are signs that international foundations have become more willing to support programs that are more compatible with local interests and priorities (Interview with an
international foundation representative in January 2007). On the other hand, recent years have witnessed the emergence of more diversified funding sources, including domestic foundations, individual membership fees, and governmental purchases of social services. One eNGO also reported that services purchased by local governments have become its primary funding source in recent years, and annual revenues from governmental purchases have been between 400 to 500 thousand Chinese Yuan (Interview with an official of B09, January 2010). That said, although increasing funding has become available to civil society organizations in China, one Beijing-based eNGO and a few non-Beijing eNGOs reported that funding is still the major challenge to their organizational development (Interviews with officials of A05, A11, B01, B08, B16, January 2010).

ENGOs that have become more active in policy advocacy tend to be those with better financial resources. As has been extensively reported, financial difficulty has always been a great challenge to Chinese eNGOs. Because of government restrictions on NGO fundraising and the scarcity of voluntary donations, many grassroots eNGOs have faced serious financial difficulties, making international aid extremely important for their survival and development. Four of the six eNGOs that have become more active in policy advocacy are in good financial shape, and no financial difficulty was reported by them during the first round of interviews between 2003 and 2005. Another eNGO that is active in policy advocacy does not regard financial difficulty as a major problem because its activities are mostly staffed by volunteers. Among the six eNGOs, the only one that has reported financial difficulty is one outside Beijing; yet its leader was a successful business
owner, and in recent years this person has devoted around 300 thousand Chinese Yuan and other resources to the eNGO’s operation (Interview with an official of B08, January 2010).

ENGOs located in Beijing are more likely to be engaged in policy advocacy than those located outside it. Given the political status of Beijing as the capital of China, this pattern is not surprising. For many years, Beijing has been the primary location of activities for many active NGOs in China, and such a unique location has provided them many advantages in raising public attention or lobbying the government. Meanwhile, leaders of Beijing-based eNGOs are more likely to build strong personal relationships with officials and leaders of the central government. Under certain circumstances, central governmental officials may want to use eNGOs as a channel for delivering policy messages to local governments, and eNGOs leaders are mostly happy to help with the task; yet it is also true that eNGOs that focus too much on politics cannot survive in China (Interview with an official of B20, July 2010). Also, as shown in Table 2, currently half of Beijing-based eNGOs are primarily engaged in political activities and/or policy advocacy, while the majority of local eNGOs are still focusing on traditional activities, such as education and species protection, etc.

ENGOs with more active policy advocacy tend to have better political connections with the existing party-state system. For the six eNGOs that are active in policy advocacy, their leaders can all be categorized in some ways as social elites, including three former or current university professors, one environmental scholar, one senior news reporter for a state news agency, and one local politician. In China, these social elites usually have well-established political connections and access to the policy process, as well as
communication channels with government agencies and business firms. ENGOs that have experienced growth in policy advocacy tend to occupy central positions in networking relations with other eNGOs. For example, among the six eNGOs that are politically active, three of them are identified by Sullivan and Xie (2009) as major actors in China’s online environmental community.

Registration status is associated with an NGO’s willingness to engage in policy advocacy. All six eNGOs that are active in policy advocacy are legally registered organizations. Having a non-registration status may reduce an eNGO’s willingness and capacity for policy advocacy or collective campaigns. That being said, it appears that registration status is not necessarily related to the amount of non-political activities carried out by an eNGO. As long as they are not in political trouble and can obtain financial resources from somewhere, eNGOs can maintain their operations no matter whether they have a legal status. Based on these observations, one may conclude that governmental control on organizational registration has to some extent limited the policy advocacy activities of eNGOs in China.

In sum, recent years have observed growth in policy advocacy and collective campaigns by eNGOs in China, and the diversification of organizational activities among Chinese eNGOs also indicates a possible trend toward a more pluralistic civil society. Table 4 provides a summary of the changes with respect to institutional environments, organizational resources, and political activities.

Table 4 about here
DISCUSSION AND CONCLUSION

Existing literature has documented extensively the political and resource constraints that have limited the growth of civil society in China; yet few of them have traced the changes of these political and resource parameters over time and in what ways such changes may have facilitated or reshaped the development of Chinese NGOs. Our study fills a gap in the literature by focusing on these changes. Specifically, our study shows that, in the past few years, some political changes have had positive, and some have had negative, effects on the development of NGOs in China. Positive changes include the increased political tolerance for media reports on environmental incidents and the introduction of public participation requirements into official environmental policy making and implementation procedures. Negative changes include the continued restrictions on NGO registration and increased internet censorship. In combination, these changes have opened up more opportunities for policy advocacy, but the eNGOs that were better able to explore these opportunities are those that are formally registered and led by social and political elites.

This mixture of positive and negative changes reflect the inherent fragmentation of China’s authoritarian political system, characterized by increasing conflicts among political leaders over environmental issues as well as misalignments between the central and local governments. Some eNGOs have taken advantage of the opportunities created by these conflicts and misalignments to increase their influence in the policy process. Some eNGOs have also strengthened their societal connections by raising funds domestically and reaching out to pollution victims.
Our study applied existing social science theories to examine the evolution of eNGOs in China. From the perspective of political opportunity theory, the case of China represents a unique set of political changes, involving a combination of willingness of governments at various levels to draw on NGOs to help address various societal issues and continuing attempts by the party-state system to control NGO activities. This set of changes has allowed for sustained, but limited, growth of the eNGO sector. From the perspective of resource dependency theory, the case of China illustrates how various forms of resources—financial, human, and informal social connections with the party-state—enable some eNGOs to become more active in policy advocacy; yet some resources, such as informal social connections with the party-state, in turn may constrain the types of advocacy undertaken by these eNGOs.

Our research also moves the existing literature forward by identifying the political strategies used by eNGOs to hold government accountable in environmental governance. For many years, Chinese eNGOs had been ‘mild’ in terms of policy advocacy. Yet recent changes in institutional constraints have created opportunities for eNGOs to play a more politically active role, and those with better financial resources and political connections have made significant progress in policy advocacy and are more active in conducting type 4 to 6 activities as defined by Diamond (1999). eNGOs have increased the use of legal and administrative channels to express their concerns and justify their actions. This change represents significant progress compared with what we found in our previous round of research in 2003-5 when personal connections or media reporting were the primary channels for eNGOs to influence environmental decision making. Of course, many eNGOs
are still constrained by limited financial resources and human resources, and focus on environmental education. Moreover, a few eNGOs have been able to operate without any legal registration status, and this non-registration status may have constrained their willingness or capacity to conduct policy advocacy work. All these findings help us to understand the internal dynamics of and institutional constraints on eNGO policy advocacy in China.

Moreover, the initiation of some degrees of political contestation by eNGOs, as in the case of collective campaigns involving multiple domestic civic eNGOs and sometimes international NGOs, may have broad implications for China’s governance reform and democratization. These activities were almost non-existent in China during the 1990s and the early 2000s. With increasing numbers of eNGOs and their involvement in collective campaigns, some eNGOs have developed greater capacities for challenging governments and holding officials accountable for their environmental performance. If this trend continues, civic NGOs in China may eventually become a stronger force in democratizing governance in China.

Our research shows that eNGO leaders that have stronger personal connections to the party-state tend to be more active in policy advocacy. This pattern of elite politics raises important questions for future research, that is, to what extent these connections to the party-state may also affect the types of policy advocacy undertaken by the eNGOs, and to what extent these connections may enhance or undermine the abilities of these eNGOs to hold governments accountable. Questions can also be asked about the patterns of interactions between political and social elites and in what ways such interactions may
shape the evolution of the authoritarian regime itself. To answer these questions, it is necessary to probe deeper into the career backgrounds of these eNGO leaders, and how their career backgrounds and current political connections shape their work with their eNGOs. Another direction for future research is to explore what resource mobilization strategies eNGOs have utilized to strengthen their policy advocacy capacity. Overall, studying the political leadership and resource mobilization strategies of eNGOs will enable us to have a more comprehensive appraisal of the development of civil society and governance reform in China.
References:


Cooper, C. M. 2006. ‘This is Our Way In: The Civil Society of Environmental NGOs in South-West China’, Government and Opposition, 41, 1, 109-36.


TABLE 1 Registration types of civic eNGOs

<table>
<thead>
<tr>
<th>Types of Registration</th>
<th>Beijing-based NGOs</th>
<th>Non-Beijing NGOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social organizations</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Private non-profit organizations</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Corporations</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Registered with other governmental agencies</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Operation without registration</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Total Number of eNGOs</td>
<td>10</td>
<td>8</td>
</tr>
</tbody>
</table>

Data reported in this table were collected through interviews, online sources, and other third-party reports. These data must be interpreted cautiously because we were not able to directly reach a few eNGOs in the second round of interviews and had to rely on indirect sources to determine the status of these organizations.
TABLE 2 *Organizational activities of civic eNGOs*

<table>
<thead>
<tr>
<th>Time</th>
<th>Beijing-based NGOs</th>
<th>Non-Beijing NGOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primarily engaged in</td>
<td></td>
<td></td>
</tr>
<tr>
<td>environmental education and</td>
<td></td>
<td></td>
</tr>
<tr>
<td>conservation projects</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(type 1 to 3 activities),</td>
<td></td>
<td></td>
</tr>
<tr>
<td>with limited engagement in</td>
<td></td>
<td></td>
</tr>
<tr>
<td>advocacy</td>
<td>8</td>
<td>4</td>
</tr>
<tr>
<td>Primarily engaged in</td>
<td></td>
<td></td>
</tr>
<tr>
<td>political actions (type</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 to 6 activities) *</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Total Number of eNGOs</td>
<td>10</td>
<td>8</td>
</tr>
</tbody>
</table>

* Data reported in this table was collected through interviews, online sources, and other third-party reports. These data must be interpreted cautiously because some eNGO officials might not have reported their environmental advocacy activities during our interviews.
<table>
<thead>
<tr>
<th>ID</th>
<th>Time</th>
<th>Policy Issues Addressed by the NGO Coalition</th>
<th>Number of eNGOs*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>January 2005</td>
<td>Issue: Environmental Law Enforcement</td>
<td>56 (17)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>In an open letter to the general public, 56 eNGOs expressed their support to the State Environmental Protection Administration’s enforcement decision to suspend 30 local power plants and industrial projects, all of which had failed to follow environmental impact assessment (EIA) procedures as required by the law. This letter also called for more stringent environmental law enforcement and more public participation in EIA. Source: <a href="http://www.people.com.cn/BIG5/huanbao/1072/3142058.html">http://www.people.com.cn/BIG5/huanbao/1072/3142058.html</a></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>In two separate open letters to governmental agencies, the eNGO community asked for the disclosure of the environmental impact assessment report of the Nujiang Hydropower Station Project. The letters cited related laws, such as EIA Law, Administrative License Law, to support their petitions. Source: <a href="http://www.nujiang.ngo.cn/Dynamics/2005/0800">http://www.nujiang.ngo.cn/Dynamics/2005/0800</a> <a href="http://www.ngocn.org/?action=viewnews-itemid=25294">http://www.ngocn.org/?action=viewnews-itemid=25294</a></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>July 2005</td>
<td>Issue: Public Hearing in EIA</td>
<td>3(3)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>In 2005, the EIA process for a cultural heritage park, to be built in Yuanming Yuan, Beijing proceeded without public participation. Several eNGOs in Beijing expressed their concerns and asked for intervention from the State Environmental Protection Administration. As a result, the EIA was revised. Source: <a href="http://www.fon.org.cn/content.php?aid=11435">http://www.fon.org.cn/content.php?aid=11435</a></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>2004-2009</td>
<td>Issue: Energy Saving</td>
<td>22(7)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Every year in the summer since 2004, an alliance of many eNGOs issued an open letter to the general public asking people to keep their indoor temperature at no less than 26℃ for the purpose of energy saving.</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>August 2008, November</td>
<td>Issue: Environmental Information Disclosure</td>
<td>6 (4)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>In an open letter addressed to Goldeast Paper, a member of APP</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>November 2009</td>
<td>Issue: EIA and Approval of a Hydropower Station Project</td>
<td></td>
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<tr>
<td>-------------</td>
<td>---------------</td>
<td>--------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>In a letter addressed to the Ministry of Environmental Protection, six eNGOs expressed their concerns over the ecological consequences of the approval of Xiaonanhai Hydropower Station Project, which may cause harm to many endangered fish species in the river. Source: <a href="http://www.fon.org.cn/content.php?aid=12214">http://www.fon.org.cn/content.php?aid=12214</a></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>November 2009</td>
<td>Issue: Judicial Rulemaking on Environmental Information Disclosure Government Information Disclosure Act</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>The alliance of seven eNGOs submitted comments to the Supreme People’s Court on judicial rulemaking related to Government Information Disclosure Act. They asked the Supreme Court to clearly indicate in the rules that governmental agencies should be responsible for mandatory environmental information disclosure as requested by citizens and civic groups. Source: <a href="http://www.fon.org.cn/content.php?aid=12211">http://www.fon.org.cn/content.php?aid=12211</a></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>November 2009</td>
<td>Issue: Climate Change</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>In an open letter to the international community, seven eNGOs expressed their positions and opinions on global climate change and provided policy suggestions to foreign countries and the Chinese government. Source: <a href="http://www.fon.org.cn/content.php?aid=11579">http://www.fon.org.cn/content.php?aid=11579</a></td>
<td></td>
</tr>
</tbody>
</table>

* The first number indicates the total number of eNGOs that participated in a collective campaign. The second number in parentheses indicates the number of eNGOs in our sample that participated in a collective campaign.
TABLE 4 Continuities and changes: a comparison of eNGOs

<table>
<thead>
<tr>
<th>Dimensions</th>
<th>Issues</th>
<th>2003-2005</th>
<th>2009-2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institutional</td>
<td>Organizational Registration</td>
<td>Registration was a major challenge for many eNGOs.</td>
<td>No significant change in registration requirements. A few eNGOs in this</td>
</tr>
<tr>
<td>Environment</td>
<td></td>
<td></td>
<td>sample lost the support from their sponsoring organizations.</td>
</tr>
<tr>
<td></td>
<td>Public Participation Channels</td>
<td>A lack of legal procedures requiring public inputs prevented active</td>
<td>Several new laws and regulations that mandate public participation or</td>
</tr>
<tr>
<td></td>
<td></td>
<td>participation of eNGOs in environmental policy processes.</td>
<td>information disclosure have taken effect.</td>
</tr>
<tr>
<td>Organizational</td>
<td>Financial Resources</td>
<td>Beijing-based eNGOs were heavily reliant on international funding, while</td>
<td>ENGOs’ funding is from more ample and diversified sources.</td>
</tr>
<tr>
<td>Resources</td>
<td></td>
<td>local eNGOs had limited access to international funding and were more</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>likely to rely on funding from individuals.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Human Resources</td>
<td>Most eNGOs relied on volunteers.</td>
<td>More eNGOs have fulltime staff with pay.</td>
</tr>
<tr>
<td></td>
<td>Major Activities</td>
<td>Environmental education was a major focus of eNGOs in China.</td>
<td>Although environmental education is still a major focus of most eNGOs,</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>more eNGOs have participated in policy advocacy.</td>
</tr>
</tbody>
</table>