Lobbying Practices of Citizens’ Groups in China

Emina Popović

Abstract
As previous research indicates, some advocacy groups in China work hard to represent their members and to have their voice heard in the policy-making process. However, little is known about how those groups influence decision-making, what channels they use, and what they offer in exchange for access. This study is thus designed to provide better insight into political activities of citizens’ groups and to set the stage for testing plausible hypotheses on interest representation in China. To increase understanding of advocacy groups’ interactions with policy makers and their endeavours to mobilize the public over policy issues, 38 interviews were conducted. The interviews revealed that even though citizens’ groups extensively use their resources as access goods in exchange for participation in policy-making, public backing for their policy positions is considered even more important for accomplishing advocacy goals than direct access to decision makers. The findings suggest that interest representation theories and concepts developed in Western societies, despite the differences in political systems, can be useful for explaining China’s advocacy groups’ political activities.

Keywords
Chinese politics, interest groups politics in China, citizens’ groups, lobbying strategies, policy-making in China

While we know relatively a lot about advocacy groups’ activities and their importance in democratic political regimes, their role in nondemocratic regimes is much less clear, as their political activities and influence on the policy-making process are vastly underresearched. The same is valid for the world’s biggest autocracy—China, which advocacy groups’ activities are examined in this research. There exist good reasons for enhancing research efforts in interest representation in China, some of which might also be present in the context of other authoritarian and hybrid regimes. Namely, despite single-party authoritarian regime, the Chinese government cannot be treated as one monolithic, unitary actor (Lieberthal & Oksenberg, 1988; Mertha, 2009). On the contrary, advocacy groups in China face many state actors and agencies with different agendas and policy goals and, thus, can potentially utilize multiple channels for entering the policy-making process. Another reason can be found in the fact that the number of business associations, civil society organizations, and big private companies is already immense and still in rapid growth.1 Certainly, not a large percentage, but some of those organizations, try to have a say in policy-making.

As few case studies have already indicated, there are advocacy groups in China, which proved able of shaping certain policy outputs (Downs & Meiden, 2011; Mertha, 2009; Steinberg & Shih, 2012). However, most of the previous related studies only touch upon interest representation while focusing on decision making in China (e.g., Mertha, 2009; Wang, 2008; Yadav, 2008; Zhou, 2014), Chinese political economy (Kennedy, 2005), consultative authoritarianism (e.g., Lin, 2014; Teets, 2013; Truex, 2014), and so on. On the other hand, studies that tackle advocacy groups mainly focus on normative implications of their influence. Some scholars see advocacy groups’ influence as distractive and harmful for decision making in China (L. Sun, 2006; Y. Sun, 2007; Zhao, 2006) and invite for the stricter regulations and directives for their participation in the policy making. Zhang and Liu (2006), however, argue that under government’s guidance and control, advocacy groups can play an important role in enhancing the democratization and scientification of policy-making in China. Whereas a number of recent studies bring examples of the substantial impact of some business advocacy groups on shaping the policy outputs (Downs, 2008; 2015; Steinberg & Shih, 2012; Yuan, 2012), citizens’ groups are mainly claimed to be oriented on “service delivery” and reluctant to practice political activities (Tang & Zhan, 2008; Wexler, Ying, & Young, 2006). In their recent research, Zhan and Tang (2016) found that

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nongovernmental organizations (NGOs) whose leaders are connected to the government are more likely to be engaged in policy advocacy than those with no linkage to state institutions. Regarding outside lobbying strategies, some studies have revealed NGOs’ successful mobilization of public, mainly over environmental issues, through which their position in policy-making was strengthened (e.g., Han & Heejin, 2013). Moreover, in their study on environmental protests in China, Steinhardt and Wu (2015) conclude that there is a trend of “mutual reinforcement of [NGO’s] policy advocacy and street protests.” It is thus evident that some NGOs are active in their attempts to affect public policies, yet as to how those groups exert influence, what channels they utilize and what they offer in exchange for access, little is known at present.

The first goal of this research is to empirically confirm that these questions are relevant and important to ask in the Chinese context. Namely, while the findings of some existing studies argue for more research on China’s advocacy groups, we also know from the literature and media that nongovernmental organizations in China, some more than the others, are tightly monitored, often dependent on and closely connected to the party-state (Hildebrandt, 2013; Unger & Chan, 1995). Hence, it is justifiable to question whether advocacy groups, and in particular citizens’ groups, as defined in Western literature exist and function in the Chinese context. Through examining NGOs’ interactions with decision makers and their indirect attempts to exert the influence on policy-making, the research endeavors to offer an overview of their political activities and to propose the theoretical framework for studying advocacy groups in China by suggesting some of the concepts and theories developed in Western societies which can be useful for understanding advocacy groups in authoritarian regimes. Furthermore, by putting forward new research questions, this study attempts to lay groundwork for future projects on interest groups politics in China, and conceivably other autocracies. Its findings suggest that, like their counterparts in Western countries, citizens’ groups in China use their resources as access goods in exchange for participation in policy-making. Less expectedly, they also tend to devote significant part of resources for ensuring and strengthening public backing, which they perceive as crucial for accomplishing advocacy goals.

The first section aims at defining and clarifying advocacy groups in the Chinese context. The second section of this article presents research design. It also provides observations on difficulties encountered during the interviews and offers suggestions on how to mitigate them in future research. A subsequent section gives an analysis of inside lobbying strategies as well as of indirect attempts to influence policy-making as used by interviewed citizens’ groups. The conclusion section discusses suggested findings and the potential of related interest representation theories to be applied in nondemocratic regimes.

Defining Advocacy Groups in Chinese Context

Before engaging in the discussion about advocacy group’s political activities, we need to define what is meant by advocacy groups, and which, if any, existing organizations in China fall under that description. Scholars, politicians, and journalists use different definitions, which, as warned by many, are causes of conceptual ambiguity in the field of interest representation (e.g., Baroni, Carroll, Chalmers, Marquez, & Rasmussen, 2014). For the purposes of this study, advocacy activities are defined as “all interactions through which individuals and private groups not holding government authority seek to influence policy, together with those policy-influencing interactions of government officials that go well beyond the direct use of their authority” (Lindblom, 1980, p. 85).

Many authors have hypothesized that the variations in the usage of advocacy strategies as well as the success of advocacy groups’ political activities are related to the characteristics of particular groups’ types. Three commonly distinguished types of advocacy groups are specific interest groups, professional groups, and citizens’ groups, the latter of which are studied in this research. Citizens’ groups are seen as the representatives of public interest and advocates of causes that appeal to the broader population rather than to those directly related to the professions of their members (Berry, 1999, p. 2). However, even in the countries with highly developed civil societies, the capacity of citizens’ groups to promote citizens’ interest in policy making is not indisputable. Some authors argue that these groups are not always interested in taking part in policy consultations or any other type of participation, which would potentially allow them to influence policy-making (Aspinwall & Greenwood, 1998; Wang, 2006). In the same vein, Fisher (1997) asks an important question—To whom are the citizens’ groups accountable: to the public, general membership, or particular wealthy donors? The issue of citizens’ groups’ accountability and autonomy, for obvious reasons, is even more present in nondemocratic regimes, where the state, if not always as a donor, acts as a strict supervisor (e.g., Baum & Shevchenko, 1999; Cohen & Arato, 1992). In China, organizations that represent citizens’ interest are often not independent from the state. The level of autonomy differs from case to case, and it depends on the multiple institutional, economic, and NGO specific factors (Saich, 2000). Although the autonomy of civil society organizations is still debated, research has shown that both grassroots and government-organized groups commonly possess so-called “operational autonomy” (e.g., Wang, 2006). Some authors claim that there is connection between the increase in NGOs’ autonomy and the intensified exchange relationship between government and NGOs (Howell, 2004; Teets, 2013). They argue that in exchange for NGOs’ participation in the provision of public goods such as education, health care, infrastructure, and social security
In the chosen policy fields. Most of the interviews took place in spring and summer 2014, and the rest in spring 2015. As the organizations that are engaged in advocacy activities are difficult to identify, purposive sampling was used to collect data. I first contacted the most visible NGOs in the Chinese press. The organizations were contacted through telephone calls and were asked whether there were policy issues in their field about which they had the opportunity to express their position to the government, or over which they communicated their position to the broader public or media. Nearly 70% of contacted NGOs reported some contact with the policy makers concerning policy proposals, which output they tried to influence. Organizations’ representatives who answered affirmatively were asked for the interview. Except for only three NGOs, all the other organizations’ leaders agreed to be interviewed. Profile of the organizations that claimed their engagement in at least one policy proposal ranged from organizations with only three employees and less than US$50,000 yearly budgets to those with more than 20 employees, large number of volunteers, and considerably bigger budgets. None of the organization was fully financed by the state and unable to choose its leaders. Organizations that agreed to participate in the research were further asked to recommend other organizations who they believed to be engaged in advocacy activities in their policy field. Toward the end of the fieldwork, all the organizations suggested for further interviews have been already included in the sample. Thus, I am confident that this sample includes a vast majority of organizations based in Beijing, which tend to engage in advocacy activities in their fields.

All the interviews were semistructured with open-ended questions and were held at the interviewee’s working place, except in four cases when they were conducted during the informants’ break time. Interviews with NGOs were in average 2 hr long, while those with other interviewees averaged 1 hr. The first set of questions was focused on groups’ general activities and aims and was followed by the questions about their contacts with policy makers regarding the policy proposals that they tried to influence. Final questions addressed advocacy groups’ contacts with media and the attempts to influence public opinion. Interviews with journalists and other experts in the fields have been undertaken additionally to supplement groups’ description of their relationship with media as well as to obtain their position on forming a public opinion over policy issues in China.

In very rare occasions, informants were unwilling to respond to certain questions, or they claimed not to know the answer. However, I have repeatedly recognized informants’ tendency to describe their lobbying attempts in comparison with their counterparts in Western societies. In many cases, this has resulted in underestimation of their own role in policy-making. Surprisingly, many informants supposed that many more advocates in Western countries are engaged in the policy-making process than the relevant literature suggests. The power and the influence of Western advocacy groups were likewise overestimated. I compensated for this highly biased starting point by asking specific questions on NGOs’ particular political activities. Namely, informants’ answers about their activities in specific policy events lead to very different conclusions about their involvement in policy-making from those where they expressed their perception on general circumstances.

**Research Design**

For the purpose of this study, altogether 38 interviews have been conducted. Interviews were held in Beijing with 28 NGOs in the field of environmental protection, food safety, education, elderly, and children rights. Along with that, 10 interviews were conducted with journalists and other experts in the chosen policy fields. Most of the interviews took place in spring and summer 2014, and the rest in spring 2015. As the organizations that are engaged in advocacy activities are difficult to identify, purposive sampling was used to collect data. I first contacted the most visible NGOs in the Chinese press. The organizations were contacted through telephone calls and were asked whether there were policy issues in their field about which they had the opportunity to express their position to the government, or over which they communicated their position to the broader public or media. Nearly 70% of contacted NGOs reported some contact with the policy makers concerning policy proposals, which output they tried to influence. Organizations’ representatives who answered affirmatively were asked for the interview. Except for only three NGOs, all the other organizations’ leaders agreed to be interviewed. Profile of the organizations that claimed their engagement in at least one policy proposal ranged from organizations with only three employees and less than US$50,000 yearly budgets to those with more than 20 employees, large number of volunteers, and considerably bigger budgets. None of the organization was fully financed by the state and unable to choose its leaders. Organizations that agreed to participate in the research were further asked to recommend other organizations who they believed to be engaged in advocacy activities in their policy field. Toward the end of the fieldwork, all the organizations suggested for further interviews have been already included in the sample. Thus, I am confident that this sample includes a vast majority of organizations based in Beijing, which tend to engage in advocacy activities in their fields.

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Citizens’ Groups’ Engagement in Policy-making

Advocacy groups’ participation in policy process may improve the decision making by supporting policies that are beneficial for citizens and discharging those that are in line solely with the interest of political elites. However, not all the groups have access to decision making. Studies have shown that groups’ characteristics may affect their chances of gaining access to policy-making and can also determine their choice of lobbying strategies. For instance, groups that possess more resources tend to use more direct access to policy makers than groups with fewer resources available to supply the policy makers in their demands (Dir & Mateo, 2012; Lowery, Gray, & Fellowes, 2005; Schattschneider, 1960). Resources here are widely defined and embrace money, professional staff, expertise as well as the information about constituencies’ and public opinion. Compared with some other types of advocacy groups, citizens’ groups have less financial resources, less workforce to devote to the issues at the table and less information about their diffuse constituencies. In the case of NGOs in China, although the numbers of the groups and their members are in rapid growth for more than 20 years, most grassroots organizations are severely understaffed (Spires, Tao, & Chan, 2014). Moreover, the party-state concern about civil society potential to challenge the current regime, which is reflected in high restrictions on NGOs registration and fundraising (e.g., Hildebrandt, 2011) could further allude to NGO’s difficulties in gaining access to policy-making. Thus, due to lack of resources that China’s NGOs typically encounter and state’s suspicions toward civil society, denial of access or low degrees of access was expected to be reported by the interviewed NGOs’ leaders.

Do Citizens’ Groups Get to Say Something and to Whom?

Contrary to theoretical expectations, nearly 70% of contacted NGOs reported access to policy makers in at least one of the policy proposals which output they tried to influence. Analysis of the interviews reveals that NGOs have the most frequent contacts regarding policy proposals in their field with the relevant Ministries. For instance, NGOs that are concerned with public education reported regular contacts with the Ministry of Education; environmental NGOs with the Ministry of Environmental Protection (MEP) and with departments related to environmental issues within different administrative bodies. Most of NGOs’ leaders stated that they contact the government on weekly or at least monthly basis depending on the phase of the policy process.

Informants repeatedly acknowledged frequent use of various tactics in accessing policy makers, including both formal and informal practices. Official methods include mainly written reports which contain policy position, relevant information, and research findings, as well as information on public opinion regarding the policy proposal. Informal communication is mostly conducted through the phone calls primarily for the purpose of inquiring about the advancement of policy-making process and offering expertise. This is how one of the environmental NGOs’ leaders explained the nature of their contacts with MEP:

The Ministry officials are approachable and in most of the cases we have similar perspectives on the problems, which makes the communication smoother. We have both formal and informal contacts with MEP. For example, some of my former classmates are now working there, so I usually drop them an e-mail to ask what is happening with the proposals. Some people who work there are also members of our organization, so we do have lots of information and contacts from inside. (Interview no. 6; Beijing, March 2014)

Many informants emphasized that some of the ministries in the state council are much more influential than the others and if engaged, they tend to play a decisive role in policy-making. Hence, advocacy groups’ ability to shape policy output can be affected by the power of the state institution with which they have established contacts. For instance, the MEP is perceived by NGOs as weak, to the extent that some of the state-owned companies and even private companies are seen as more influential than the Ministry. Often mentioned example of a powerful institution is the National Development and Reform Commission (NDRC), an agency under the State Council with planning responsibility and administrative control over the Chinese economy. None of the interviewed NGOs had regular contacts with the NDRC, even though most of them seek for cooperation and information exchange with that institution. Dominant explanation for the NDRC’s denial of access to NGOs is found in its focus on economic growth, which makes it closer to business advocacy groups’ preferences that are often in conflict with citizens’ groups’ policy positions. A head of the well-known Beijing’s NGO shared their experience with the NDRC,

Many policies are developed by NDRC and are later only distributed to other governmental institutions for confirmation. We would like to get involved in the process straight at the beginning with the NDRC, as that would be the best way to influence it, but so far they [NDRC] are out of our reach. (Interview no. 20; Beijing, June 2014)

It is indicative that many NGOs find their contacts with both representatives of the National People’s Congress (NPC) and the Chinese People’s Political Consultative Conference (CPPCC) ever more useful in their endeavors to take part in policy making. The experience of one of the NGOs is illustrated in the following statement:

It is crucial to know the right person [within mentioned institutions], who might care about the issue and is willing to
share the position with other representatives. We sometimes provide them with our policy proposals before the sessions of the Congress, and they [the representatives] then present the proposal at the Congress. This is favorable for both sides. We feel that they are happy that they get to say something and we also gain from it because they have expressed our position. (Interview no. 11; Beijing, April 2014)

One NGO leader shared the information that their NGO managed to gain the support of former prime-minister Wen Jiabao after their policy proposal was introduced to him by an NPC representative. Contacts with NPC members are often described as based on the trust, previous experiences, and shared values. However, despite the very common opinion among the interviewed NGOs that the NPC representatives are becoming an efficient channel through which their preferences might be taken into consideration, the power of NPC members to make decisions is very limited, which thus makes influencing policy outputs through the parliamentary arena primarily an indirect process. Intriguingly, when asked about their contacts with Chinese Communist Party (CCP) members, all the NGOs’ leaders without exception denied any efforts to influence decision making through policy makers as members of the party, but rather as government officials or parliament members.

Many NGOs recognize that providing policy makers with valuable technical and political information brings them power to influence decision making and, thus, to improve policy outputs. NGOs’ leaders find that most of the policy issues are too complex for the government to solve them without including nonstate actors as, in their experience, the government often lacks insights and the deeper understanding of the problem. Thus, an in-depth knowledge of problems is seen by a vast majority of NGOs as their main asset to be offered to policy makers. Yet, while most of the informants emphasize the importance of the technical information and knowledge that they provide to policy makers in order to improve the policies, there are also others who see their function in policy-making primarily as raising the accountability and legitimacy of the decision-making process in China by bringing people’s will into the policy-making.

NGOs With Privileged Access

The highest degree of access that an advocacy group can gain is to be invited by the government to policy consultations. Surprisingly large percentage, around one fourth of the interviewed NGOs, reported at least one invitation to consultation. An informant from an NGO that is often invited for consultations elaborated that there are two types of consultations to which NGOs are invited. The purpose of the first type is for policy makers to inquire about NGOs’ policy-related suggestions. In this kind of consultation, NGOs are often invited to present their information to policy makers, findings, and solutions related to a particular policy issue. While this type of consultation is focused on providing technical information, in the other type, mentioned by the informant, the government’s goal is to obtain political information about the circumstances in certain NGOs’ sector, overall civil society or public opinion. The criterion for the invitation has crystallized with almost all NGOs that took part in consultation agreeing that invitations are based on previous successful cooperation with the government. Trustworthiness and good reputation among government officials have been described as the key criteria for receiving the calls for policy consultations. As one of the NGOs’ leaders puts it, “the government seeks for the opinion of experienced and well-known NGOs; the one that has no extreme views and has established a good relationship with the government in previous collaborations” (Interview no. 14; Beijing, May 2014).

Nevertheless, NGOs’ leaders’ experience in policy consultations varies significantly. While for some the participation was meaningful and constructive, others have complaints about the form and the content of the consultations. They criticized ad hoc nature of the meetings claiming short notices, no meeting agenda, or any written materials available before neither during the meetings. Further complaints were connected with the nonexistence of feedback mechanism. Feedbacks, as often repeated, were only provided in an informal manner when NGOs explicitly asked for it, mainly through personal connections. However, some of the NGOs’ leaders have a more optimistic view that can be summed up in the statement of one of the informants: “If NGOs have an interesting and constructive suggestion, they [the government] will listen and respect them, and for most of us this is already a big achievement” (Interview no. 13; Beijing, May 2014).

It has repeatedly been stated that except NGOs, very commonly experts in the field have been invited for consultations. Many NGOs expressed the view that apart from experts’ views, business actors’ preferences are particularly taken into account in policy-making. Their position is perceived as strong, because of their role in generating economic growth and employment, which is considered to be the main source of regime’s legitimacy. One of the informants noticed that NGOs positions serve more as a reference point, but the government is more likely to focus on the needs of the industry. They [the government] might make pressure on them, but more in a symbolic way, because they [the government] still need these firms more than they need us. They are connected through their mutual interests. (Interview no. 26; Beijing, May 2015)

One of the tactics to get closer to the invitation for a consultation is by organizing various conferences and symposiums while aiming for the opportunity to establish direct contacts with policy makers. Namely, most of the NGOs are very active in organizing forums to which they invite government officials from relevant institutions, scholars, universities
NGOs’ leaders agreed with this statement. While using both and so was their influence. All the subsequently interviewed that attracted the attention of the public was usually higher, NGOs participation in the policy-making around the issues was well illustrated in the following NGO leader’s positions by distributing press releases, contacting reporters, various lobbying tactics including disseminating their policy statements namely suggest that NGOs tend to engage in a limitation that they face when engaging in outside lobbying. Their access denial, harassment, or even shutdown of the organization NGOs will avoid public political activities due to the risk of punished, advocacy groups are expected to be less engaged in public opinion may offend decision makers and can be perceived as confrontational behavior for which groups can be punished, advocacy groups are expected to be less engaged in public advocacy. These attempts to influence public opinion may offend decision makers and can be perceived as confrontational behavior for which groups can be punished, advocacy groups are expected to be less engaged in outside advocacy. The statements from the interviews with China’s NGOs’ leaders, however, contradict this theoretical expectation that NGOs will avoid public political activities due to the risk of access denial, harassment, or even shutdown of the organization that they face when engaging in outside lobbying. Their statements namely suggest that NGOs tend to engage in a various lobbying tactics including disseminating their policy positions by distributing press releases, contacting reporters, participating in public debates, publishing research reports and organizing petitions as a way to get closer to their goals. This is well illustrated in the following NGO leader’s statements:

We have our goals that we want to reach, and we use all the possible ways to do that. On the one hand, we work on building people’s awareness and attitudes towards particular problems, and on the other, we discuss with experts and government how to change the bad policies. (Interview no. 2; Beijing, March 2014)

In one of the first interviews, the informant stated that NGOs participation in the policy-making around the issues that attracted the attention of the public was usually higher, and so was their influence. All the subsequently interviewed NGOs’ leaders agreed with this statement. While using both direct access and outside lobbying strategies seems to be a common practice, most of the informants recognized favorable public opinion as crucial in the events where the public was mobilized. Counterintuitively for authoritarian regimes, to stress the importance of indirect way of acting, the leader of one well-known NGO metaphorically explained that their “achievements are mainly made through creating the ‘turbulences’”, namely through activating the public around the issues that they try to influence.

Almost all the NGOs have reported very good relationship and fruitful cooperation with media. Many NGO leaders were themselves journalists before they founded an NGO or started to work for some of the existing ones. Thus, most of them still have close contacts with the press, which often provides them with more space in media and the opportunity to inform the public about the issues on their agenda. This is especially true in the case of ENGOs. One of their leaders’ shared the following opinion:

They [media] transmit our messages to the broader public, increase our influence in society, create pressure on government and on industry. Thus, their role is crucial for all the ENGOs. Of course, we are aware that journalists must be very careful because they can bear serious consequences if they cross the limit in doing so. (Interview no. 8; Beijing, April 2014)

Some NGOs organize events where experts hold the lectures and introduce the problem to journalists and the interested public. Even NGOs who cannot financially afford organization of big public events are enabled by new technologies to inform relatively inexpensively and efficiently interested public and media about new issues in their field. They use social media extensively as a way to attract supporters and to make the public aware of the current issues. Some of the NGOs publish their own articles online, mainly on Weibo and Weixin platforms and they frequently take part in online conferences to engage in discussions with the experts and industry representatives.

It is indicative that of the 28 interviewed NGOs, none have taken part in organizing or have participated in any kind of street protests. As an explanation to this, many NGO leaders have emphasized their role as professionals, as opposed to activists who organize the protests. While distancing themselves from the street protests, most of informants acknowledged that if organized around the issues of their interest, protest bring citizens’ groups closer to their policy goals because “the government tends to address the issue with more attention to the public interest” (Interview. no 17; Beijing, May 2014). Notwithstanding, almost without exception, NGOs are naming cooperation with the government as a way to success. Moreover, as one of the informants pointed out, some NGOs do not even want to have any relationship with organizations that are known as “trouble-makers”, “We don’t want to cooperate with NGOs who have a low reputation among government officials. We are all under control of
the National Security, and we do not want to get bad label by cooperating with blacklisted organizations” (Interview no. 23; Beijing, April 2015). Yet, when asked about the alternative to cooperation, they all agreed that open confrontation would at best lead to marginalization. Thus, more than belief in prospects of cooperation, the reason for the nonconfrontational behavior and for not being involved in protests comes from the concern that these kinds of activities may lead to severe punishments.

**Discussing the Findings: Toward Future Research**

There has been a lengthy discussion over whether different theories and concepts in social sciences that originate from the Western societies can be applied to China. This study adds to the discussion by showing that using some of the theoretical approaches and concepts of interest representation, which are developed to explain the realities of the much different political regime, can be useful for comprehending China’s advocacy groups’ political activities. As the analysis of interviews reveals, information-access exchange logic frequently applied in interest groups politics can be likewise helpful in explaining interactions between advocacy groups and policy makers in China. Namely, it seems to be a regular practice for China’s advocacy groups to supply policy makers with political and technical information in exchange for a certain level of access to decision making process. Citizens’ groups examined in this research proved able to acquire resources and to supply policy makers with relevant information and expertise, which allowed them to communicate their policy position to decision-makers or even to take active part in policy-making. This indicates that advocacy groups activities and their interactions with the policy makers might be more institutionalized and resource-oriented than is commonly recognized. The argument is strengthened by the finding that groups do not regard CCP as an access point to policy-making. Rather, the most common venues are the relevant State Council institutions responsible for the policy drafting, which are contacted mainly through formal channels of communication. Resource-based lobbying, as recognized by the advocacy groups, might be a direct result of policy makers’ increased demand for know-how and information after administration reforms in which many state institutions’ responsibility and capacity have been reduced. Indeed, the findings confirm that “venue shopping” at the institutions which are stronger in capacities, such as NDRC, is harder than ensuring access at the institutions that are perceived as weak. The extent and the importance of resource-based lobbying, and the suggested variation in its employment depending on the capacity of the institutional venue, should be further tested preferably by investigating the demand side of the interaction.

We also learned that state actors invite some NGOs for the policy consultations and thus provide them with the privileged access to policy-making process. However, there seems to be a difference in perception about policy consultations’ effectiveness across participants. While some found consultations to be the most promising way to exert the influence, the others perceive them as the occasion for rubber-stamping of a decision that has already been taken. It is, however, not evident and needs to be investigated further whether groups’ characteristics, policy area, or some other elements are responsible for the indicative differences in the level of access among citizens’ groups and their ability to make an impact through the institution of the policy consultation. Even though the study focuses on the advocacy groups’ activities rather than their influence on policy-making, the self-assessment of the influence assessed by the groups that are using inside lobbying strategies, including participants in policy consultations, suggests that their impact on shaping policy outputs through this strategy is low. The future studies should examine further whether the influence of the citizens’ groups is indeed lower in comparison with some other types of advocacy groups, as assessed by informants of this study, and whether groups to whom the privileged access has been granted are more influential in comparison with groups which use some other lobbying tactics.

Another significant and unexpected result is that citizens’ groups in China, similar to interest groups in Western societies, are inclined to combine inside and outside advocacy strategies. By so doing, citizens’ groups tend to build close links with media, particularly unofficial ones to raise the salience of issues, mobilize public, and communicate public opinion to policy makers. Yet, we need to investigate more to learn in what circumstances they combine strategies and how effective on one, and sensitive on another side, using outside lobbying strategies might be, having a social stability as the highest party-state’s priority. In any event, high effort and resources that citizens’ groups put into outside lobbying activities suggest that they perceive public opinion as an important element of decision making, which can affect the policy outputs. What exactly is the relationship between advocacy groups and public opinion on one hand, between public opinion and public policies on the other, and what is the rationale for government’s responsiveness on public demands are the questions that remain to be explored.

Finally, even though the study suggests that some of the well-known theoretical frameworks can be applied to China, the political and socioeconomic circumstances in testing these theories must be taken into consideration by assuring that theoretical approaches are context sensitive and adapted to the Chinese reality. This study is thus arguing for the usefulness and applicability of adapted Western theories in interest representation in China; however, it should not be taken as an evidence of smooth “traveling” of theories in general.
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Notes

1. China Daily, a state-run newspaper, reported in 2012 that the number of NGOs in China had grown to almost 500,000. The numbers of unregistered organizations and those registered as businesses range from 200,000 to 1.4 million.
2. As most of the citizens’ groups interviewed for the needs of this research are nongovernmental organizations (NGOs), the terms citizens’ groups and (advocacy) NGOs are used interchangeably.
3. Common classification of the NGOs in China distinguishes two main categories types: “service organizations” and “grassroots” organizations. The former category include the organizations which are financed by the state and which leaders have been chosen by the supervisory body. “Grassroots” associations are independent in deciding on the leadership of the association.
4. During the transition from the centrally planned economy to a “socialist market” economy, the number and the size of the Chinese state institutions was downsized. Moreover, the central government has transferred responsibility for the provision of the larger part of public goods to local governments, while fiscal transfers to local government remained low (see Yang Dali, 2004, for administrative reforms in China). As a result, local government found partners in providing public goods in NGOs and has turned over many functions and services to third sector (Howell, 2004).
5. GONO is a commonly used acronym for nongovernment organizations launched or sponsored by a government.
6. The names of the interviewees, as well as the institutions, are anonymous due to considerations of confidentiality and ethics.
7. This has proved to be the most efficient way of inquiring whether the organization practices any sort of political activities. When asked in more general fashion about NGOs participation in policy-making, informants have often pointed out that unlike in Western countries, all the political decisions in China are brought exclusively by the state. In few cases, informants were referring to any contacts with government as political activity, while, during the conversation, it was obvious that most of the contacts were about the service provision and public procurement.

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