
Advocacy in an Authoritarian State: How Grassroots Environmental NGOs Influence Local Governments in China

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ABSTRACT

While many NGOs in China are seen mainly as service providers working to fulfill state goals, in this article we show that Chinese grassroots environmental NGOs (ENGOS) regularly employ a variety of advocacy strategies to influence local-level government policy. Based on in-depth interviews with ENGOS active in Guangdong, this study examines these groups' advocacy efforts and considers their implications for the further development of Chinese civil society. Our analysis finds that these groups employ three main advocacy strategies: (1) cultivating a stable, interactive relationship with the government using existing institutional means to communicate their concerns; (2) carefully selecting the "frames" used to present their preferred policy goals and outcomes; and (3) obtaining media exposure to mobilize societal support for their goals in order to put pressure on the local state. ENGOS use these strategies concurrently, though their concrete choices vary case by case. Taken as a whole, such practices suggest the ability of civil society to carve out more political space than the state is commonly believed to grant. While this increased policy engagement by ENGOS could lead to stronger state governance and thus help sustain China's authoritarian system, we argue that it may also open up new pathways for robust civic engagement by ordinary citizens and civil society organizations.

The recent literature on civil society in China has generally focused on explaining the survival of autonomous grassroots NGOs under authoritarianism. While neither a liberal civil society model nor a purely corporatist model provides a satisfactory answer, the extant scholarship suggests that the retreat of the state from social welfare provision and the fragmentation of the state have created a space for grassroots NGOs to emerge.¹ Previous research, however, did not fully anticipate a recent development that holds far-ranging implications for

1. Timothy Hildebrandt, *Social Organizations and the Authoritarian State in China* (Cambridge: Cambridge University Press, 2013); Anthony J. Spires, "Contingent Symbiosis and Civil Society in an Authoritarian State: Understanding the Survival of China's Grassroots NGOs," *American Journal of Sociology* 117 (2011): 1–45; Jessica C. Teets, *Civil Society under Authoritarianism: The China Model* (New York: Cambridge University Press, 2014).

China's changing state-society relations—grassroots NGO advocacy aimed at influencing local-level government decision making. As we show in this article, in the field of environmental protection some grassroots NGOs are now regularly serving as watchdogs to government policies, calling for implementation of existing regulations, critiquing and campaigning against undesirable policies, and exerting pressure on government to solve environmental problems. That grassroots NGOs have taken on this new role as active agents seeking to influence local governments is empirically significant, especially given the recent intensification of controls on Chinese civil society.

In this article, we will investigate the ways in which grassroots environmental NGOs (ENGOS) advocate for change in government policies and will argue that such advocacy efforts may lead to an important expansion of civic engagement in China.² ENGOS have been pioneers in advocacy, as one of the most active and developed sectors in Chinese civil society.³ More importantly, the ENGOS spotlighted here take policy advocacy not merely as something they are occasionally drawn into but as an integral and regular part of their work. A small number of scholars have analyzed the factors facilitating and constraining ENGO advocacy,⁴ but to date there have been few grounded, qualitative studies of actual advocacy activities, let alone systematic analyses of advocacy strategies.⁵

In the following pages, we first briefly review apposite literature on advocacy to situate our study within current understandings of ENGOS in China. We then depict the broader political environment ENGOS operate in—a mixture of tightened control on civil society and favorable policies and laws about NGOs and environmental protection. With the context set, we will analyze in-depth interviews to identify the advocacy strategies employed by grassroots ENGOS. Our findings demonstrate that they are able to assert a role as knowledgeable experts and proactively influence government decision making. While many scholars have recognized that improving the government's performance and responsiveness helps stabilize and legitimize authoritarian rule, we argue that such ENGO advocacy

2. Although we focus on ENGOS, it should be recognized that other NGOs, even those mostly focusing on service delivery (e.g., in health and education), also sometimes engage in advocacy work.

3. Hildebrandt, *Social Organizations*, 17; Fengshi Wu, "Environmental Activism in Provincial China," *Journal of Environmental Policy & Planning* 15, no. 1 (2013): 89–108; Shawn Shieh and Amanda Brown-Inz, "Mapping China's Public Interest NGOs," in *Chinese NGO Directory: A Civil Society in the Making* ([Beijing]: China Development Brief, 2013), 1–23.

4. Li Hui, Carlos Wing-Hung Lo, and Shui-Yan Tang, "Nonprofit Policy Advocacy under Authoritarianism," *Public Administration Review* 77, no. 1 (2016): 103–17; Xueyong Zhan and Shui-yan Tang, "Political Opportunities, Resource Constraints and Policy Advocacy of Environmental NGOs in China," *Public Administration* 91 (2013): 381–99.

5. It is important to note that while the groups in our study may be concerned about global climate change or nationwide environmental problems, most of their advocacy efforts are focused at the local level, in their particular district, city, or province.

ultimately implies another possibility—the opening of new pathways for robust civic engagement.

ADVOCACY AND THE GROWTH OF CHINESE ENGOS

Current discussions of advocacy and civic engagement have been largely shaped by the experiences of democracies, where policy advocacy typically refers to influencing government policy making but can include “any attempt to influence the decisions of an institutional elite on behalf of a collective interest.”⁶ Some scholars make distinctions between insider/direct strategies—working directly with policy makers and other institutional elites such as through lobbying—and outsider/in-direct strategies like shaping public opinion or mobilizing demonstrations and protests to change the policy-making environment.⁷

While scholars have recognized that advocacy is not impossible under authoritarianism,⁸ too little is known about what NGO advocacy looks like in China, where interest group politics is not the norm and adversarial advocacy is not tolerated by the government. Nevertheless, without explicitly referring to the word “advocacy” or “civic engagement,” scholars have shown that Chinese politics is not immune to influence from nonstate actors. Intellectuals and experts who have served as consultants to government bodies or who informally are close to power have provided policy suggestions through internal channels or interpersonal relationships.⁹ At the same time, protests may be seen as one-off cases of advocacy that push the government to attend to particular grievances and which may also produce policy changes.¹⁰ Christoph Steinhardt and Fengshi Wu, for example, contend that recent environmental protests have taken on a public interest dimension by calling for policy reform and by inducing more explicit NGO advocacy.¹¹

In general, however, many of the Chinese civil society groups outside the environmental realm have been perceived as service providers as opposed to advocates, and as “helpers” to whom the state looks when trying to meet social welfare responsibilities and to conduct policy implementation. Though Chinese civil so-

6. Elizabeth J. Reid, “Understanding the Word ‘Advocacy’: Context and Use,” in *Structuring the Inquiry into Advocacy*, ed. Elizabeth J. Reid (Washington, DC: Urban Institute, 2000), 1–7.

7. Reid, “Understanding the Word ‘Advocacy’”; Jennifer E. Mosley, “Institutionalization, Privatization, and Political Opportunity: What Tactical Choices Reveal about the Policy Advocacy of Human Service Nonprofits,” *Nonprofit and Voluntary Sector Quarterly* 40, no. 3 (2011): 435–57.

8. Ian Scott, “Analyzing Advocacy Issues in Asia,” *Administration & Society* 44, no. 6 (2012): 4–12.

9. Shaoguang Wang, “Changing Models of China’s Policy Agenda Setting,” *Modern China* 34, no. 1 (2008): 56–87.

10. See, e.g., Yongshun Cai, *Collective Resistance in China: Why Popular Protests Succeed or Fail* (Stanford, CA: Stanford University Press, 2010).

11. H. Christoph Steinhardt and Fengshi Wu, “In the Name of the Public: Environmental Protest and the Changing Landscape of Popular Contention in China,” *China Journal*, no. 75 (2016): 61–82.

ciety is growing and making changes on the margins, it is weak, not rebellious, and lacks the capacity to promote larger social change.¹² NGO efforts to alleviate social problems can improve the state's responsiveness and accountability, ironically strengthening favorable views of the state's performance and legitimacy. As Jessica Teets puts it, NGOs may be contributing to "better governance under authoritarianism."¹³ In the environmental realm, the growth of environmental organizations has been attributed to the state's recognition of the many environmental problems arising alongside economic development and to the weakness of the state's own environmental protection bureaucracy.¹⁴ Earlier research found that grassroots ENGOs worked primarily on environmental education and nature conservation, while they had not yet started to tackle underlying political and social issues and were "less successful in influencing government decisions and official behaviors."¹⁵

Nevertheless, it was known that a few established ENGOs have been involved in advocacy campaigns, exemplified in a series of campaigns against building dams in Southwest China.¹⁶ These campaigns marked the most successful and influential cases in which grassroots ENGOs have influenced government decisions. These campaigns also demonstrated that ENGOs are able to make use of the Environmental Impact Assessment Law and the Administrative Licensing Law and to mobilize social support to pressure the government to open up its decision-making process and allow for a greater degree of policy deliberation.¹⁷ Some scholars have argued that these cases also succeeded because of the initial opposition of the State Environmental Protection Administration to dam-building projects, and that in general the environmental protection bureaucracy was keen to solicit public

12. A recent study of China's HIV-AIDS activists concludes, for example, that the obstacles to social movements are virtually insurmountable. See Hans Jorgen Gasemyr, "Networks and Campaigns but not Movements: Collective Action in the Disciplining Chinese State," *Journal of Civil Society* 12, no. 4 (2016): 394–410.

13. Teets, *Civil Society*.

14. Peter Ho, "Greening without Conflict? Environmentalism, NGOs and Civil Society in China," *Development and Change* 32, no. 5 (2001): 893–921; Jonathan Shwartz, "Environmental NGOs in China: Roles and Limits," *Pacific Affairs* 77, no. 1 (2004): 28–49.

15. Yiyi Lu, "Environmental Civil Society and Governance in China," *International Journal of Environmental Studies* 64, no. 1 (2007): 59–69; Tang and Zhan, "Civil Environmental NGOs."

16. See, e.g., Lu, "Environmental Civil Society"; Thomas Johnson, "Environmentalism and NIMBYism in China: Promoting a Rule-Based Approach to Public Participation," *Environmental Politics* 19, no. 3 (2010): 430–48; Andrew C. Mertha, *China's Water Warriors: Citizen Action and Policy Change* (Ithaca, NY: Cornell University Press, 2009); Heejin Han, Brendon Swedlow, and Danny Unger, "Policy Advocacy Coalitions as Causes of Policy Change in China? Analyzing Evidence from Contemporary Environmental Politics," *Journal of Comparative Policy Analysis: Research and Practice* 16, no. 4 (2014): 313–34; Guobin Yang and Craig Calhoun, "Media, Civil Society, and the Rise of a Green Public Sphere in China," *China Information* 21, no. 2 (2007): 211–36.

17. Heejin Han, "Policy Deliberation as a Goal: The Case of Chinese ENGO Activism," *Journal of Chinese Political Science* 19, no. 2 (2014): 173–90; Han, Swedlow, and Unger, "Policy Advocacy Coalitions"; Mertha, *China's Water Warriors*.

opinion and to bring ENGOs to the discussion table so as to bolster its own position vis-à-vis other parts of the government.¹⁸

One recent study has found that ENGOs have engaged in policy advocacy more often since 2005 and that those with more political connections to the party-state system and richer financial resources were more likely to do so.¹⁹ More broadly, the extant literature suggests that government-organized NGOs (GONGOs) may be in a better position to advocate for policy change through the corporatist structure in which they retain close ties with the state.²⁰ In 2003 Jude Howell argued that the All-China Women's Federation was "best positioned of all women's organizations to influence government and Party policy" through acting as a policy consultant and using its contacts with government officials, representatives of the National People's Congress, and the media. Howell argued that independent organizations, by contrast, could only focus on service delivery and not policy advocacy.²¹ A half decade later, Samantha Keech-Marx found that three well-connected women's organizations in Beijing were able to push for legal reform by utilizing their state connections and borrowing the state's language to "frame" their recommendations.²² Similarly, environmental GONGOs have assisted with government policy formation and engaged in advocacy coalitions.²³ A recent nationwide survey of 267 ENGOs found that government funding and subsequent collaboration with the government increased the likelihood of ENGOs' engagement in policy advocacy but suggested that grassroots ENGOs were not well positioned for policy advocacy because of their lack of capacity and concern about bringing trouble upon themselves.²⁴ In short, the extant literature indicates that advocacy in China by NGOs seems more likely to be found in groups that are proximate to decision makers.

As noted above, the previous literature that touched upon grassroots ENGO advocacy focused on campaigns against hydropower and other nationally or internationally famous cases, and the organizations analyzed were typically well-connected GONGOs or a few prominent autonomous ENGOs such as Beijing-based Friends of Nature. This is partly because in earlier periods there were only a small number of ENGOs that engaged in policy advocacy. But this focus on a few

18. Johnson, "Environmentalism and NIMBYism," 439; Lu, "Environmental Civil Society."

19. Zhan and Tang, "Political Opportunities."

20. Ho, "Greening without Conflict?"; Schwartz, "Environmental NGOs."

21. Jude Howell, "Women's Organizations and Civil Society in China: Making a Difference," *International Feminist Journal of Politics* 5, no. 2 (2003): 192–215.

22. Samantha Keech-Marx, "Airing Dirty Laundry in Public: Anti-domestic Violence Activism in Beijing," in *Associations and the Chinese State: Contested Spaces*, ed. Jonathan Unger (Armonk: M. E. Sharpe, 2008), 175–98.

23. Wu, "New Partners or Old Brothers?"; Maria Francesch-Huidobro and Qianqing Mai, "Climate Advocacy Coalitions in Guangdong, China," *Administration & Society* 44, no. 6 (2012): 43–64.

24. Li, Lo, and Tang, "Nonprofit Policy Advocacy."

famous, elite-led organizations has obscured the larger picture of advocacy by grassroots ENGOS. This article aims to update the literature by examining how grassroots ENGOS have made local-level advocacy a regular part of their work and also to consider what lessons their advocacy holds for our understanding of state-society relations in China.

METHOD AND DATA

Interviews were conducted in 2016 with leaders of eight grassroots ENGOS (four of whom were interviewed twice) in Guangzhou and Shenzhen, two major cities in Guangdong province (table 1). Guangdong is famous for its relatively open political environment and has been a locus of grassroots NGO activity over the past decade and a half.²⁵ The interviews were supplemented by analysis of the ENGOS' websites, blogs, written reports, and social media platforms, as well as news reports about these ENGOS and government documents. We believe the eight groups generally depict the situation of ENGOS in Guangzhou and Shenzhen. The staff of ENGOS in the same city know each other well; when asked to name other ENGOS they knew, their responses generated almost the exact same list.

All eight groups are legally registered, having registered in some form between 2012 and 2015. Two of the groups registered as membership-based nonprofit "social organizations" (*shehui tuanti* 社会团体), one as a for-profit business and the others as "nongovernmental non-commercial enterprises" (*min ban fei qiye danwei* 民办非企业单位), a nonprofit category that allows an NGO to sell products or services for revenue. Despite their relatively recent registration, all of these groups were established in an earlier period, before registration processes were somewhat liberalized. At the time of our interviews, the group that is registered as a business had tried but been unable to register as a proper NGO. Nevertheless, the group's leader believed their operations were not unduly hampered due to this legal status as a business.²⁶ The eight NGOs are mostly medium-sized grassroots groups, with six to nine full-time salaried staff, while the smallest has three full-time and two part-time staff. Their budgets range from hundreds of thousands to several million yuan, coming mostly from domestic foundations, businesses, and, to a lesser extent, government. They demonstrate a fair degree of specialization, with three working exclusively on water, one on industrial pollution prevention, one on waste, one on nature education, one on green transportation, and one on wetland conservation, water, and community engagement.

25. Anthony J. Spires, Lin Tao, and Kin-man Chan, "Societal Support for China's Grass-Roots NGOs: Evidence from Yunnan, Guangdong and Beijing," *China Journal*, no. 71 (2014): 65–90.

26. Registering as a business has been a common practice among grassroots NGOs in China (*ibid.*).

Table 1. An Overview of the Eight ENGOs

Number	Issues	Registration Status	Full-Time Staff	Budget (yuan)	Governmental Affiliation	International Ties
1	Water	<i>Mingfei</i>	3	300,000	Leader is a former Bureau of Environmental Protection official	Leader worked in a US-based NGO; has ties to a Hong Kong-based ENGO
2	Water	<i>Shetuan</i>	3	[Uncertain]	Young Volunteers Association Guangzhou	Has ties to a Hong Kong-based ENGO
3	Water	<i>Business</i>	6	3,000,000	None	Has ties to an international ENGO and a Hong Kong-based ENGO
4	Waste	<i>Mingfei</i>	6	800,000	None	None
5	Industrial pollution	<i>Mingfei</i>	8-9	300,000	None	None
6	Green transportation	<i>Mingfei</i>	8	1,000,000	None	None
7	Wetlands, water, community	<i>Shetuan</i>	7-9	500,000	Shenzhen Volunteers Association	None
8	Nature education	<i>Mingfei</i>	9-10	3,000,000	None	Has ties to an international ENGO

SHRINKING POLITICAL SPACE, FAVORABLE POLICY LINES

Though China has witnessed a surge in NGOs since the 1990s, observers believe it is now a dark time for Chinese civil society. Censorship of the mass media and of cyberspace has increased; human rights lawyers and activists have recently been detained and interrogated; and several labor NGOs in Guangdong were suddenly repressed in December 2015. The Overseas NGO Management Law, passed in April 2016, places unprecedented restrictions on international NGOs (INGOs) that operate in China and may cut off already dwindling INGO funding for domestic NGOs.²⁷ The state is also restricting NGO contacts with foreign organizations and personnel. One group rejected our interview request, citing a regulation that any interview with foreign personnel would have to be reported to the local Bureau of Civil Affairs 15 days in advance.²⁸ The space for NGOs has diminished to such an extent that little room is left for even moderate and reformist NGOs that were once able to conduct work in nonsensitive areas.²⁹ NGOs that focus on environmental protection have not been spared by the recently deteriorating political climate. In October 2016, for instance, one ENGO leader was detained for 10 days by a city-level Bureau of State Security for “leaking state secrets,” after this ENGO had collected and widely publicized pollution data.³⁰

Nevertheless, there are countercurrents in national policies and laws, many of which originated well before the recent crackdown on civil society under Xi Jinping. New official rhetoric promoting “social management innovation” has encouraged local and provincial governments to cooperate with civil society and has also led to the registration of more “social organizations” (including more GONGOs). Starting in 2012, Guangdong was the first province to reform registration regulations, allowing NGOs to register with the Ministry of Civil Affairs without first needing to be sponsored by a government-affiliated supervisory agency. As part of this reform, the earlier restriction against more than one organization representing a particular constituency was relaxed. There could now be more than one organization working on similar issues at the same administrative level, though registering as a social organization (*shehui tuanti*) remained difficult for some groups. China’s first national charity law, which came into effect in September 2016, could if fully implemented also expand space for civil society, for it relaxes

27. In our study, only one group received a small amount of money from a foreign foundation. After explaining to government inspectors that they also had multiple domestic funders and were constituted as a domestic NGO, they felt that the new law “wasn’t that big of a problem.”

28. In early 2016, the Guangzhou Bureau of Civil Affairs called NGOs to a meeting to emphasize that any activities related to foreign funding and personnel should be reported in advance.

29. Samson Yuen, “Friend or Foe? The Diminishing Space of China’s Civil Society,” *China Perspectives* 3 (2015): 51–56.

30. “Pilu wuran shuju huanbao NGO fuzeren Liu Shu beibu” [Environmental NGO leader Liu Shu detained for disclosing pollution data], October 11, 2016, <http://www.rfa.org/cantonese/news/arrest-10112016073626.html>, accessed March 27, 2017.

the requirements to register “charitable organizations” (a new legal form of organization), allows fundraising, and promises tax incentives to encourage philanthropy.

Our interviews indicate that the loosened registration in Guangdong encouraged previously “illegal” grassroots NGOs to gain legal status and also new NGOs to emerge. Taking advantage of the new regulation, seven of the eight groups registered as NGOs in or after 2012. They said that registering was relatively easy. One, originally based in Chongqing, registered as a new organization and set up an office in Guangzhou in 2015, explicitly because of the relatively open registration and political environment. However, the openness of the new regulations should not be overstated; as noted above, one group remained registered as a business, probably because of its connections with a prominent international environmental NGO.

In line with state rhetoric, the Guangzhou Bureau of Civil Affairs, which is in charge of registrations, expressly supports the development of NGOs, which in Chinese legal parlance are now called *shehui zuzhi* (social organizations). Guangzhou’s New Measures on Social Organization Regulation, which took effect at the start of 2015, stipulate that the government is to gradually transfer some government functions (*zhengfu zhineng zhuan yi*) and outsource public services to NGOs. It also stipulates that registration regulation agencies should establish bases for “nurturing” NGOs. This increased rhetorical and regulatory support for “social organizations” serves to increase their legitimacy in the eyes of the state and the public, creating space for advocacy by ENGOs and NGOs working on other issues. To make good on its promises, the Guangzhou Bureau of Civil Affairs has also organized “venture philanthropy” (*gongyi chuangtou*) activities for three years since 2014, and by the end of 2016 it claimed to have provided 52 million yuan to finance service programs proposed by NGOs.³¹ One ENGO in our study reported that the funding it received from such government-organized venture philanthropy accounted for one third of the organization’s total budget in a recent year.

As for environmental policies, the greening of the Chinese state is also well under way. The State Environmental Protection Administration was elevated to ministry level in 2008—now the Ministry of Environmental Protection (MEP). The new ministry has normally taken a favorable official stance toward ENGOs. In Guangdong, the Center for Environmental Education and Communications under the Bureau of Environmental Protection claims to be nurturing ENGOs by giving small grants and awards, with the ultimate goal of achieving “collaborative social governance” (*shehui gongzhi*) between the state and roughly 300 ENGOs

31. Guangzhou Bureau of Civil Affairs, “Gongyi chuangtou ‘Guangzhou Moshi’ yue zou yue shun” [Venture philanthropy the Guangzhou model is working out well], November 15, 2016, <http://www.gzmz.gov.cn/gzsmzj/mtgz/201611/28062ef1066548eb9b344d23246a0be5.shtml>, accessed March 2, 2017.

in the province.³² The National People's Congress, China's legislature, amended the Environmental Protection Law in 2014, strengthening the Ministry of Environmental Protection's enforcement power and emphasizing the government's responsibility to address environmental problems. Also relevant to ENGOs is the growing encouragement of and legal requirements for public participation, as the amended law adds a chapter on information disclosure and public participation. The amended Environmental Protection Law also allows for public interest litigation, and NGOs are qualified to be complainants. Overall, Chinese ENGOs work in a complex and ever changing environment, with contradictory political currents but also a general trend toward greater recognition of and participation by NGOs.

ADVOCACY STRATEGIES OF GRASSROOTS ENGOS

When asked about their work, interviewees from four of the groups spontaneously stated that policy advocacy (*zhengce changdao* 政策倡导) is an integral part of their work, while one group, though not mentioning this term, has had major accomplishments in policy advocacy and deals with the government frequently. Two groups do not consider advocacy as an integral part of their work, although they do work to expand public participation. An interviewee from the final group specifically mentioned monitoring of the government (*jiandu zhengfu* 监督政府) as their job. For these eight groups, the simplest and most common advocacy activity is to request the government to address specific environmental problems—for instance, to punish a polluting factory. Most of these ENGOs also offer policy suggestions and initiatives to the city government and promote disclosure of information by government and business. Two of the ENGOs' leaders often write newspaper columns critiquing government policies, and four of the groups have initiated or participated in campaigns against government decisions and policies.

In seeking to influence the government, ENGOs as a whole typically resort to three main strategies:

Strategy 1: Using Formal Institutional Means and Building an Interactive Relationship

The government cannot deny the legitimacy of using institutional channels and is generally obligated to follow official procedures when making responses. ENGOs publish research reports and open letters, submit proposals to the city-level People's

32. See "Guangdong niyong 5 nian shijian peiyu 300 ge huanbao shehui zuzhi" [Guangdong plans to nurture 300 environmental social organizations within five years], Chinanews, December 13, 2014, <http://www.chinanews.com/df/2014/12-13/6874228.shtml>, accessed March 3, 2017; and "Guangdong peiyu huanbao shehui zuzhi jin 300 jia longtou xiangmu ke huo zizhu" (Guangdong Nurtures Almost 300 Social Organizations, Dragonhead Projects Can Receive Funding), Chinanews, December 14, 2016, http://www.gd.xinhuanet.com/newscenter/2016-12/14/c_1120112253.htm, accessed March 3, 2017.

Congress or Political Consultative Conference, apply for information disclosure, and make use of channels that the local government has established to show its commitment to communicating with citizens, such as government “office visiting” days (*jiefang ri* 接访日), the Committee of Public Consultation and Supervision (*gongzhong zixun jiandu weiyuanhui* 公共咨询监督委员会), and the “mayor’s mailbox” in Guangzhou.

It was somewhat surprising to find that most grassroots ENGOs were able to directly communicate with the government through formal means despite few prior personal connections (*guanxi* 关系). One group sent a letter to the mayor through the “mayor’s mailbox” online and eventually had the problem resolved by the mayor’s order. Another ENGO leader commented, “If you are not familiar with certain departments, you can still send them something.” When asked how he got in touch with the government the first time, a leader who was experienced in working with local governments nationwide said, “You just go and make an appointment. You just need to find them directly.” This was not easy, though; he waited for months before meeting with the Guangzhou Bureau of Environmental Protection for a first-time, two-hour talk. Similarly, the ENGO that appealed to the mayor had previously approached several city departments that had passed the buck, and the ENGO was also ignored or turned down by city-level People’s Congress deputies.

ENGOs sometimes favor formal channels even though they also have informal talks with certain government officials. One group led by a former city-level Bureau of Environmental Protection official failed to talk formally with the bureau but emphasized “following the official procedures” and “using official channels” when advocating for information disclosure. The group had begun seeking formal meetings with the bureau, arguing “it is to let the Bureau get accustomed to dealing with ENGOs publicly, to improve their administrative efficiency . . . to learn how to face skepticism from the public.”

Personal connections are still an advantage. One ENGO leader joined the China Democratic League, which advises the Guangzhou government, “to know more people related to the government, so as to make it easier to do policy advocacy.” For the two ENGOs registered as “social organizations,” close ties with the Young Volunteers Association, a GONGO under the Communist Youth League, similarly make it easier to establish a cooperative relationship with local governments. To quote a leader: “We use its name [Young Volunteers Association] as an endorsement . . . because this relates to the problem of survival. . . . That is, if we use this identity to communicate with the Water Authority, [they will think] ‘Oh, they’re from the Young Volunteers teams,’ so they will somewhat let down their guard.”³³

33. Interview with an ENGO leader, January 29, 2016.

Although the new Environmental Protection Law entitles NGOs to file public interest litigation (*gongyi susong* 公益诉讼), it requires organizations to be registered at the city level for at least five years, which excludes grassroots groups that did not immediately register after the relaxation of regulations in 2012. Many ENGOs also cite their lack of financial resources, knowledge, and experience in public interest litigation as obstacles.³⁴

Filing an administrative appeal (*xingzheng fuyi* 行政复议) is relatively common when ENGOs apply for a local government to disclose information. A successful appeal to a superior government agency would force the subordinate agency to again review the ENGO's requests. But none of the eight ENGOs regularly resorted to administrative litigation (*xingzheng susong* 行政诉讼), meaning to sue a government agency in court. A leader of one group said they view litigation as their last resort, yet they have been carefully watching the government to identify any law violations in preparation for an administrative lawsuit if need be. In a to-date rare case, one group had filed an administrative lawsuit against a district-level bureau for its failure to publicize environmental data. The ENGO refused the bureau's request for a private settlement, and despite lacking confidence in its chances of winning, the leader emphasized the broader implications of the case—"to let the law become the most important criterion of national governance" and to clarify the Regulation on the Disclosure of Government Information.³⁵ The ENGO eventually won the case and later organized a workshop to share its experience about seeking information disclosure and administrative litigation.³⁶

Grassroots ENGOs also consciously try to cultivate a long-term, stable, and interactive relationship with local governments. Rather than relying on preexisting *guanxi*, they actively seek to nurture new relationships, pursuing frequent communication with the government with the goal of building mutual trust. Underpinning communication is the government's realization that it needs ENGOs to monitor pollution and to gather local information. For instance, one ENGO actively sought conversations with the Water Authority, while for its part the Water Authority wanted the group to set up a volunteer team to survey polluted

34. One group was nonetheless participating in litigation against a tourism development corporation and a local Forestry Bureau at the time of our interviews, for it had identified an eligible NGO that could be the plaintiff and was also supported by a GONGO.

35. Interviews with the ENGO leader; Yangyang Wang, "Yaoqiu xinxi gongkai, Guangzhou NGO tingshang ju hejie" [Demanding information disclosure, a Guangzhou NGO refuses out-of-court settlement], *Caixin*, June 2, 2016, <http://china.caixin.com/2016-06-02/100950795.html>

36. Chinese activists in a variety of fields have exploited the Open Government Information (OGI) reform to advance their causes by seeking media exposure or administrative litigation when government fails to comply with OGI requirements. Our study shows that ENGOs are also adopting this tactic. For a detailed account of how OGI can be a tool for activism, see Greg Distelhorst, "The Power of Empty Promises: Quasi-Democratic Institutions and Activism in China," *Comparative Political Studies* 50 (2015): 1–35.

rivers in Guangzhou. Another ENGO wanted the city government to purchase its monitoring services but averred that “funding is definitely not the most important reason” for participating in such a program.

One group leader who had pushed for reforms in Environmental Impact Assessment regulations explained how gaining authorities’ trust enabled efficient cooperation: “With trust . . . then it’s simple and efficient. For example, if I discover a polluting enterprise, without good communication [the government] would need to spend a lot of time to verify it. . . . But with trust, it would know that our organization’s investigation is free of problems, that we must have sufficient evidence. All it has to do is penalize [the rule breaker]. So having trust saves costs and makes both our work more efficient. The government used to handle thirty cases per month, but now it can handle sixty.”³⁷

For ENGOs that critique government policies and behavior, request information disclosure, and launch campaigns against government decisions, long-term communication with government officials avoids adversarial relations. When talking about an activity by the ENGO that the government was not happy about, the leader commented, “The government knows I’m not a radical person. I’ve always been trying to communicate with them. Without communication, they don’t know your real intentions. Without knowing your real intentions, there would be biased interpretations.”³⁸

This relationship with government is reciprocal, and the government sometimes initiates communications with ENGOs. It is relatively common for relevant city government departments to invite ENGOs to forums and meetings to ask for suggestions and feedback. Based on exposure it had received in the media, a group that registered in 2015 described how the Water Authority in Guangzhou started to contact it: “From time to time, every one or two months, the Water Authority invites us [to meetings], and the director of the bureau will come and sit there and ask if we have any questions. We then make a series of complaints. He will do what he can, assign this or that to somebody to deal with it. . . . They all diligently take notes about what we say . . . but we do not know if they can really deal with it satisfactorily.”³⁹ Another ENGO reported, “People who are concerned with politics or who are within the system, when they notice your organization . . . they take the initiative to ask if you have any proposals this year.”⁴⁰ Partly because of these invitations, this group handed in 16 policy proposals before the 2016 meetings of the National People’s Congress and Chinese People’s Political Consultative Conference.

37. Interview with an ENGO leader, February 25, 2016.

38. Interview with an ENGO leader, January 28, 2016.

39. Interview with an ENGO leader, April 22, 2016.

40. Interview with ENGO staff, March 5, 2016.

Strategy 2: Framing Issues—Not Blaming, but Assisting the Government

The ENGOs in this study are careful about the way they frame issues when communicating with the local government. They have learned through experience that aligning advocacy with central policies and local interests substantially increases the chance of success. An ENGO that advocates for green transportation wrote to the mayor and received a positive reply because, the NGO believes, the mayor supported public transportation and bicycles to alleviate traffic congestion. The group acknowledged, “When asking him to bike with us, we took advantage of his policy line.” Another group agreed that ENGOs should “keep a close eye on central policy trends and the government’s work, combine your advocacy with that and grab the opportunity.” All of the ENGOs recognized that the national government has placed increasing emphasis on environmental protection and that, as a result, environmental issues are now considered less sensitive in comparison with other rights-related issues. This allows ENGOs to frame their advocacy in line with central policies. Specifically, they frame their advocacy as a form of public participation, which the state expressly encourages and is written into the Environmental Protection Law.

Following the central policy line, however, is far from enough. Even when ENGOs report a pollution case to the Bureau for Environmental Protection, officials could interpret this as criticism of the bureau and government by a troublemaker. But ENGOs in Guangdong do more than report on pollution violations. A vital strategy is to “let the government know that we have a common goal and we are partners.” A group that met with the Water Authority, for example, presented its case in a way that did not accuse the government of wrongdoing but rather as a desire to assist in solving a particular environmental problem: “The first time we communicated with each other, both sides were nervous. . . . A deputy head attended, with the bureau’s scientists and experts, they stood in the shape of a fan, and only three of us were allowed to be there. We explained to them that we are a social organization working on environmental protection in Guangzhou who came here not to find out who is responsible for what, but just in the hope of offering assistance. We can cooperate with each other to let your work be smoother. We just hope rivers and the environment will get cleaner.”

These framing tactics mean that ENGOs avoid potentially antagonistic relations over sensitive issues. As one group put it, “Don’t say anything oppositional. You should rather focus on good aspects” of government work. When the media cover problems and negative cases, ENGOs are careful to promote positive exemplary cases, in order not to “make the public and officials pessimistic.” In a similar vein, the two ENGO leaders who regularly contribute to newspaper columns, though writing mostly critical pieces, do not forget to praise the government’s improvements or any positive policies and regulations. Other groups practice the same tactics in their websites and social media platforms.

Strategy 3: Mobilizing Social Support

In contrast to Steinhardt and Wu's analysis in a recent issue of *The China Journal* about environmental protest repertoires, none of these eight groups engaged in "street mobilization" of local citizens, not even indirectly. While some of the groups' staff and volunteers had been involved in Guangzhou's Panyu District incinerator protests of 2009,⁴¹ the ENGOs they now belong to choose to mobilize social support via the mass media and the internet to bolster their influence, to expose problems, and to exert pressure on the government when necessary.⁴² Their newspaper commentaries on the environment are a "dialogue with government at a distance," according to one ENGO's leader, for "the government reads these commentaries and collects public opinions" and sometimes publishes responses in newspapers.⁴³ In addition, social media is increasingly important in shaping public opinion in China. The self-proclaimed advocacy ENGO is adept at launching campaigns and creating polls on social media to mobilize public support and attract authorities' attention.

In some cases, when ENGOs fail to influence the government through institutional means or direct communications—for instance, when the government simply ignores the problems, their critical voices, and their policy suggestions—they resort to the media to "force the government to do something. If the government ignores us, we use more radical means to force it to attend to us."⁴⁴ For instance, an ENGO once phoned a government official to report that the red mud produced by subway construction was directly poured into a river, but an investigator from the Bureau of Environmental Protection commented, "do not call us over such a trifle." So the group "made it a big deal. We put this information online, and the mass media followed up. Because of this incident, the government adjusted its policy to 'guard the river' and reinforced its implementation. . . . Later, the construction company was penalized."⁴⁵

The "nature education" ENGO usually does not interact with the government but once used the media to force a tourist development corporation that was backed by the local government to stop building roads in the core areas of a regional nature reserve. Initially, the group wrote an open letter to the Forestry Bureau, but this did not have much effect: "In fact, we shouldered pressures and didn't receive a positive response. Our volunteers would receive phone calls saying, 'Do not do

41. Steinhardt and Wu, "In the Name of the Public," 71–73.

42. Steinhardt and Wu, like us, see the mass media as a key mobilization strategy, but in our cases none of that mobilization had a spillover into street protests. This is perhaps due to the tightened atmosphere for civil society actors, but it may also be due to the professionalization and institutionalization of ENGOs in general or other individual factors.

43. Interview with an ENGO leader, January 29, 2016.

44. Interview with an ENGO leader, April 22, 2016.

45. Interview with an ENGO leader, May 26, 2016.

this anymore.” In contrast, the pressure the non-local mass media exerted on the government was effective: “Local media was under pressure to prohibit coverage on this, so we found some news media from Beijing, and held a conference to explain the situation. After that, the media in Beijing covered the incident. After the coverage, very quickly the local government made a response. . . . The corporation promised to stop construction immediately and to start to restore vegetation.”

Another ENGO found that a sewage treatment plant, located only one kilometer upstream from a water supply facility, was failing to meet quality standards each year about 20 percent of the time. The plant’s environmental impact assessment (EIA) report was also deeply flawed, and the company that conducted the EIA had already lost its official qualification to do so because of its poor performance. Several ENGOs informed local Political Consultative Conference representatives and journalists about this, but their entreaties initially failed to generate any action or publicity. Several months later, however, a journalist finally reported on it and very soon other media pursued it, putting public pressure on the government. One ENGO leader heard from a government contact that after this incident had come to the attention of the Guangzhou mayor and the city’s Party secretary, the government organized a team to prepare a lengthy report and took action to resolve the problems.

LIMITATIONS OF ENGO ADVOCACY

The three aforementioned advocacy strategies, however useful, cannot assure success. The Chinese government’s decision-making process is seldom transparent. Especially when ENGOs advocate for change through institutional channels, a substantial portion of their suggestions are simply ignored. Delayed responses and passing the buck are common practices. Though ENGOs believe that their voices have made a difference and that some policy suggestions resulted in new government practices or were written into new regulations, they often could not tell how and why certain suggestions were accepted or rejected. Opposing government policies or decisions presents a formidable challenge, especially when the opposition is based on pure environmental reasons. Rather, ENGO advocacy is most likely to succeed when it coincides with the government’s stated goals or when it is supported by particular factions within the government. To that end, one ENGO learned to ask the Bureau of Environmental Protection if it has any needs or problems the group can help address: “Within the government, they have their problems, too. . . . They are implementers of policy. . . . Revising policy isn’t part of their bailiwick. . . . But there are some policies they realize need changing, things that maybe were OK five years ago but don’t work any more now. . . . But the government cannot readily change policies from the inside.” These are opportunities ENGOs can seize on.

Yet pursuing a stable, interactive relationship with the government can also risk diminishing the advocacy function of ENGOs; some groups might end up “work-

ing for” the government or a particular government department. One ENGO in the sample has become content with reporting pollution cases, asking businesses to disclose information, and providing some suggestions through the NPC and CPPCC. Its leaders proudly spoke of how they could bypass convoluted official procedures for complaints and directly speak to certain offices within the bureau about their investigations. While this approach may help achieve the group’s immediate goals, it has ceased making efforts to elicit any wider civic participation that engages ordinary citizens.

MOBILIZING PUBLIC PARTICIPATION

A majority of the eight ENGOs adopted the strategies outlined above; however, there do exist contending ideas about state-society relations and advocacy among our group of interviewees. In general, the ENGOs that actively seek an interactive relationship with the government tend to emphasize that pressing the government to take action and to be more competent is the most efficient way to realize environmental protection. As one leader remarked, “after all, water protection is the government’s [job]. . . . Civic forces cannot do that.”

In contrast, another group, though also seeking ties with the government, prefers more direct on-site activities, such as conducting projects to teach villagers how to help themselves by introducing convenient water-testing tools and cheap handmade water purifiers. It once worked with local villagers to build water cellars and water pipelines, meeting the daily need of 30 households. When that project proposal was initially presented, villagers immediately commented, “You should talk to the government. We peasants know nothing and we cannot solve the problem by ourselves.” In response, the ENGO led villagers to finish the project, and wrote on its website: “We are complaining about environmental problems, but who do we count on to solve the problems? . . . People take for granted that the government causes and solves environmental problems. This gives the government more reasons to collect more taxes and recruit more officials. Is that a reasonable solution?”

The leader of another ENGO had previously worked at an international advocacy ENGO but came to believe that “pure” advocacy was not the best approach, which motivated him to join a grassroots ENGO full-time:

We had to spend a lot of our time fighting [*kangzheng* 抗争] to influence government policies, but many ordinary people did not understand. They only thought about economic development, so you felt your work couldn’t get much support. . . . I want to work on public participation, to look for a way that enables more and more people to form a force for change. . . . We want to take the first step, to let families know about the environment. After that, they will be thinking, “What can I do?” Then they would start from their families, such as reducing waste and consumption, etc.

After this, they would start to pay attention to [larger] environmental issues. . . . If they see something they are not comfortable with, such as reclamation . . . they would stand out to oppose it. . . . *If you want ordinary citizens to go to the streets, they must have some prior knowledge.*⁴⁶

ENGOS encourage citizens' participation by persuading them to patrol and test rivers, by showing them environmentally harmful products in supermarkets, and by forming online discussion groups. Through online and offline activities, ENGOS teach the public how to apply for government information disclosure, how to report problems to the local Bureau of Environmental Protection, and how to write opinion letters to the bureau, even offering a letter template to build on.

To be clear, the two approaches—working with the government and promoting public participation—are not contradictory; instead, most groups claim to be working in both directions. However, the ENGOS reported that mobilizing public participation is much more difficult than expected. One ENGO emerged out of a community-based NIMBY (Not In My BackYard) protest against constructing a waste incinerator, and so casual observers might expect this group to have extensive contacts with local communities. But we found that it was distant from the local community, having close ties only with environmental activists and scholars. Another group that has been relatively successful in mobilizing public support complained that gaining it “is really a big obstacle. You want to renew their ideas, but it is a very difficult job, more difficult than sending policy proposals to the government.”

MULTIPLE ADVOCACY STRATEGIES: PROTECTING GUANGZHOU'S LIUXI RIVER

A campaign to preserve the “protected zone” designation of the lower course of the Liuxi River (流溪河), which runs through Guangzhou, is illustrative of how ENGOS deployed multiple advocacy strategies simultaneously to influence the decisions of the city and provincial governments. In January 2015, the Guangzhou Water Bureau proposed removing the protected zone designation, arguing that the water quality had fallen short of the standard for drinking water for a long time and that Guangzhou no longer relied on the river for drinking water. This proposal was supposed to be agreed upon by the Guangzhou Bureau of Environmental Protection and eventually finalized by the Guangdong provincial government.

The Water Bureau allowed only seven days for public comments on the proposal, but five water pollution ENGOS joined forces to voice their opposition and

46. As we have already noted, however, getting ordinary citizens to “go to the streets” is not a practice these ENGOS engaged in.

managed to submit opinions collected from five hundred residents along with letters by the ENGOs. They also succeeded in getting a series of news stories and opinion articles published in newspapers and social media. In published comments to the Water Bureau, they openly questioned the government's true motive for seeking to remove the protected zone designation: "Several key industrial projects are to be located in the river's water source protection zone. Is this proposal to make way for those projects?" The Water Bureau later invited several ENGOs to join a roundtable to talk about the bureau's proposal, but it was a tense meeting where both parties insisted on their own positions, and at the end of the meeting the bureau's plan remained unchanged. To press their view, the three water ENGOs identified sympathetic allies in the city-level Political Consultative Conference and sought attention for the issue at the annual meeting of the local People's Congress.

Facing constant opposition, the Water Bureau and the Bureau of Environmental Protection responded through newspapers, repeatedly promising to improve the Liuxi River's water quality even after removing the protected zone. ENGOs doubted their sincerity, and published opinion pieces. In March 2016, the Guangzhou city government announced a plan for water treatment specifically for this local river. However, ENGOs still demanded that the protected zone "not be reduced even one inch."

During the second phase of the protection zone adjustment, the city Bureau of Environmental Protection followed official administrative procedures to organize a public hearing. In June 2016, one month before the hearing, the bureau revealed that the protection zone would remain but be significantly reduced in size. When preparing for the hearing, ENGOs collected and sent thousands of people's messages to the mayor and continued to publish opinion articles, arguing for keeping the original protection zone.

In October, the provincial government made the final decision to reduce the official protection zone but promised that the original area would be maintained as a "quasi-protection" zone and thus still prohibit polluting industrial projects. In this case of protracted and collective advocacy, ENGOs were unsuccessful in their fight to preserve the original protection zone in its entirety, but the city government also made concessions. As one ENGO leader commented: "The next time they plan to develop the economy in a fashion that's unfriendly to the environment, they'll know these ENGOs are going to oppose them and form obstacles."

ASSERTIVE ADVOCATES AND GROWING CIVIC ENGAGEMENT IN AN AUTHORITARIAN STATE

The findings presented here partially support a "consultative authoritarianism" model. Local governments have adopted the idea of "social management innovation" and "collaborative governance" (*xietong zhili* 协同治理) to encourage NGOs

to alleviate social problems. The ENGOs in our study have cooperated with the state in ways that increase transparency and bring residents' voices into policy making, improving government performance and perhaps helping the state's efforts to maintain social stability.⁴⁷ However, it should be highlighted that, as in the case of protecting the Liuxi River we have just described, most of these ENGOs are not limited to playing the roles of service providers or policy participants assigned to them by the government. They also engage in critical activities to change government actions.⁴⁸

It can be argued that the state permits critical voices in order to let ENGOs serve as outlets for discontent that can be contained within the state's control. In this line of thinking, inviting civil society into the policy-making process can be a way to co-opt these groups. This may contain some truth, but it overemphasizes the omnipotence of the local state while overlooking subtle dynamics in civil society's relations with the state. Our findings suggest that the consultative authoritarianism model is more of an ideal the authoritarian state wishes to realize than a reflection of the actual dynamics between ENGOs and the government. Once the state opens up channels of communication with ENGOs, ENGOs use these channels in ways not fully under the control of the state. This demonstrates the importance of the agency of civil society, as opposed to a state-centered view. In our study, four groups out of eight managed to continue their advocacy while under government pressure to stop doing so. Though most ENGOs emphasized their major goal is environmental protection, some also argued that ENGOs should "balance" the government and "provide a societal perspective to policies" and that "policies have to be deliberated." One group was bolder, asserting that its proper role is to "monitor the government, otherwise government power is boundless." These ideas support the argument that ENGOs are promoting policy deliberation with the government as an end in itself.⁴⁹

Nevertheless, ENGO advocacy at present is cautious, piecemeal, and limited to environmental governance issues. Groups are careful to avoid fundamental political issues, and the state remains both the agenda setter and final decision maker. Moreover, few groups exclusively work on policy advocacy, and most are engaging sometimes in mutually beneficial cooperation with the government. One group's leader noted his strategy about publishing commentaries in newspapers: "I think a line does exist. Some articles cannot get published, but I keep writing so that I know where the bottom line is. The next time I try to touch that bottom line . . .

47. Teets, *Civil Society*.

48. Our analysis should also be differentiated from Lee and Zhang's model of "bargained authoritarianism" in the labor rights field. Unlike labor protests, ENGOs' advocacy aims for inclusion in the decision-making process. See Ching Kwan Lee and Yonghong Zhang, "The Power of Instability: Unraveling the Microfoundations of Bargained Authoritarianism in China," *American Journal of Sociology* 118, no. 6 (2013): 1475–1508.

49. Han, "Policy Deliberation."

if it gets published, I think I can go on writing, pushing that line a little further.” ENGOS are keenly aware of the limits and frustrations of their strategies, yet a sense of gradual success and a focus on concrete environmental governance reinforce their belief in their current advocacy strategies.

Our findings also support previous arguments that the Chinese state is becoming more open to influence from civil society, at least in the environmental field and in relatively open locations such as Guangdong.⁵⁰ But in many previous studies, GONGOS, rather than NGOs, were the groups able to engage in policy advocacy. In contrast, our findings show that proactive advocacy efforts are also being pursued by medium-sized NGOs outside the elite stratum; groups with no formal links to the state and little *guanxi* are able to establish working relationships with the local government and influence policy.

Aside from the ENGOS' own efforts, political opportunities resulting from favorable policy lines or laws and support from within environmental protection bureaucracies are important factors that have made ENGO advocacy possible. ENGOS meet fewer obstacles when their work supports the goals of certain government agencies such as environmental protection bureaucracies. Officials looking for practical solutions to environmental problems tend to give support to ENGOS to conduct investigations, monitor the behavior of industry, and reinforce policy implementation. Just as important, when environmental protection bureaucracies seek to clamp down on local polluters, they can find support from ENGOS as “representatives of the people.” This is especially helpful when the polluters are supported by local prodevelopment government agencies more powerful than the environmental protection bureaucracies. Similarly, in the antidam campaigns, the Ministry of Environmental Protection formed a coalition with ENGOS to “borrow” support when it had concerns about dam construction.⁵¹

In analyzing our data, we are struck by how many of the activities Chinese ENGOS engage in are similar to what environmental advocacy groups do in democracies, including contacting a local councillor, contacting a member of parliament, signing a petition, writing to an editor of a newspaper, attending a public meeting/consultation, focusing on pressing local issues, and participating in web-based discussions.⁵² Some ENGOS with close ties to their volunteers and local residents consciously mobilize residents to participate in environmental protection by recycling, testing river water near homes, and joining efforts to peacefully challenge government policy. As seen in the efforts to preserve the protected zone status of a local river, ENGOS not only contribute to a greater awareness of envi-

50. See, e.g., Mertha, *China's Water Warriors*.

51. Han, Swedlow, and Unger, “Policy Advocacy Coalitions”; Lu, “Environmental Civil Society.”

52. Damon Timothy Alexander, Jo Barraket, Jenny M. Lewis, and Mark Considine, “Civic Engagement and Associationalism: The Impact of Group Membership Scope versus Intensity of Participation,” *European Sociological Review* 28, no. 1 (2012): 43–58.

ronmental problems but also broaden the civic engagement repertoire of average citizens. Especially when the mass media gets involved, the local government sometimes responds in a way that shores up an ENGO's legitimacy and the evaluation of its performance in the eyes of the public (and, surely, in the eyes of local officials' superiors).

While the ENGOs in our study are predominantly not the ideal-typical voluntary associations of democratic societies—as they have few members, among other differences—in China, a country without a democratic history, the leaders and staff of these ENGOs are teaching themselves how to engage as citizens in a democracy might. To the extent that they incorporate volunteers and mobilize public opinion, they are also nurturing civic engagement. If in the future these groups attract a larger membership in support of their advocacy activities, we may anticipate that civic engagement will radiate beyond these organizations. As noted earlier, scholars tend to agree that Chinese civil society groups that cooperate with the state can improve the state's performance, which in turn can reinforce the regime's stability, especially since ENGOs only advocate to change specific environmental policies and practices while not touching upon political reform. However, the kinds of ENGO advocacy described above also constitute an increased civic engagement, one involving both organizations (the ENGOs themselves) and the public that support them.

To conclude, in our examination of ENGO advocacy in Guangdong we find that ENGOs are working to carve out space to engage with both the state and the public in new ways. Despite many challenges, these ENGOs have taken on policy advocacy as part of their core work, and are taking actions to influence government decisions and policies. Usually this is framed as supportive of government goals, but sometimes they do so even in “antagonistic” ways such as exposing government inaction, criticizing government policies and decisions, and launching public campaigns against government decisions. Their experiences are teaching them and also local residents who support them about the role civil society organizations can play in helping people voice their concerns to policy makers. Rather than simply shoring up an authoritarian regime, civil society's engagement with the state can, at the same time, facilitate the development of NGOs with the skills to exert influence through a multitude of channels.