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ON CHINESE ENVIRONMENTAL GOVERNANCE

Summary. This article determines the main political and cultural factors affecting the establishment and development of international environmental NGOs operating in China according to the existing scholarly literature. The aim of this study is to gain knowledge of the context, means and ways in which international environmental NGOs operate in China and engage with the government to influence its policies and decisions. The paper studies the operation of several environmental NGOs in China. Based on the study of the activities conducted by the international environmental NGOs in China, several key factors relevant to an NGO seeking to establish a successful presence in China are mentioned in this article. Finally, it offers suggestions that international environmental NGOs may employ while operating in China.

Keywords: China, NGO, international environmental NGOs, civil society, environmental governance.

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Шанхайський університет іноземних мовМІЖНАРОДНІ НЕУРЯДОВІ ЕКОЛОГІЧНІ ОРГАНІЗАЦІЇ
ТА ЇХ ВПЛИВ НА ЕКОЛОГІЧНЕ РЕГУЛЮВАННЯ В КИТАЇ

Анотація. За останні сорок років Китай пережив вражаючий економічний розвиток. Однак, наслідки також виявилися вражаючими: різко зросла низка екологічних проблем, пов'язаних із зміною клімату, забрудненням повітря і води, а також втратою біорізноманіття. Країна почала брати активну участь у міжнародних екологічних конференціях і демонструвати свою прихильність сталому розвитку та захисту дикої природи. Китай також почав звертатися за допомогою до міжнародних неурядових організацій з питань охорони навколишнього середовища. Ці організації відіграють важливу роль у наданні допомоги жертвам забруднення в лобюванні уряду та отриманні доступу до судів, а також у розширенні прав на захист місцевих ресурсів та управління ними. Однак, Китай – авторитарна держава, а отже якщо НУО бажає діяти на території цієї країни, вона неминуче зіткнеться з проблемою легітимності. Порівнюючи з китайськими національними НУО, міжнародні організації піддаються більш пильному вивченню з боку китайського уряду. З моменту появи на території Китаю, міжнародні неурядові організації знаходяться у суперечливому та швидко мінливому становищі: вони вважаються цінними та необхідними партнерами, оскільки володіють передовими технологіями та досвідом, але також розглядаються як носії західних демократичних цінностей, і, таким чином, стають загрозливим суб'єктом. Зростання екологічної соціальної активності та її актуальність для сучасної китайської політики привернули увагу вчених і надихнули зростаючий обсяг наукових робіт. Ця стаття визначає основні політичні та культурні фактори, що впливають на створення та розвиток міжнародних екологічних НУО в Китаї, згідно з існуючою науковою літературою. Метою цього дослідження є отримання знань про контекст, засоби та способи взаємодії міжнародних екологічних НУО в Китаї з урядом для впливу на його політику та рішення. У статті вивчається діяльність кількох екологічних НУО в Китаї. Грунтуючись на дослідженні цієї діяльності, у статті перелічуються декілька факторів, що мають значення для НУО, які прагнуть забезпечити успішну присутність у Китаї. Нарешті, у статті надаються пропозиції, які можуть бути використані міжнародними екологічними НУО, що бажають здійснювати свою діяльність на території Китаю.

Ключові слова: Китай, НУО, міжнародні дії, екологічні неурядові організації, громадянське суспільство, екологічне управління.

Problem statement. Climate change is one of the most discussable issues in the global politics. Environmentalism has also become an important matter in China. In the last 40 years China has experienced impressive economic development. However, the consequences have been impressive as well: a range of environmental problems related to climate change, air and water pollution, and biodiversity loss has increased dramatically. Almost all major rivers have become polluted; many large cities faced the problem of smog; industrial and pesticide pollution has become especially serious. In 1980s, Chinese government began to implement environmental laws. The country also began to participate actively in international environmental conferences and to show its commitment to sustainable development and wildlife protection. It also began to seek help from international non-govern-

mental organizations and bilateral and multilateral aid organizations.

Aware of the need to take alternative measures to state intervention, the government addressed non-state actors regarding environmental issues. With the help of their international partners, environmental NGOs played an important role in helping pollution victims in lobbying the government and getting access to courts, and empowering rural communications rights to protect and manage their local resources. However, China is an authoritarian state. Thus, if an NGO is willing to operate on the territory of the country, it will inevitably face the issue of legitimacy. If we compare the position of a Chinese domestic NGO and the one of an international NGO, the latter will receive more scrutiny from the Chinese government and the ruling party. China's distrust towards INGOs is increasing as well as its concerns about for-

eign threats to “national security.” Thus, INGOs are facing a dual legalization dilemma in China: the first dilemma involves authoritarian government versus “non-government” [16]; the second dilemma involves the ideological differences between a socialist country and “Western values” [11]. Since entering China, international non-governmental organizations have been in a controversial and rapidly changing position: they are considered useful and necessary partners because owners of advanced technology and expertise, and at the same time they are viewed as bearers of Western democratic values and, thus, become a threatening entity.

Analysis of recent research and publications. NGOs, civil society, as well as the “third sector” seem to have an impact on non-governmental behavior in China. Ma points out that Western culture has provided valuable models of civil society to NGOs working in China, as well as the ways to connect the domestic NGO community to their counterparts in other countries [12]. However, if an NGO plans to enter the Chinese market, it must register with the Chinese government. Therefore, the government is still the most decisive factor in the development of NGOs in China.

We can see the influence of the Chinese government as contradicting the general characteristic of NGOs as autonomous. Some researchers even doubt the legitimacy of NGOs working in China. Chinese political scientist, Kang Xiaoguang (1999), argues that most NGOs operating in China can hardly conform with the general definition of NGO accepted in the Western world [9].

Qiusha Ma analyzes the concept of NGO in China and the characteristics of official policy. He also discusses two models of Chinese NGOs. In his study he comes to a conclusion that although the Chinese government still plays the most decisive role in the development of NGOs, the state is withdrawing from its social responsibilities [13]. The researcher believes that nowadays the shift toward a market economy is increasing, and the government needs nonstate-managed intermediary mechanisms more than ever before.

Studies of a transnational presence in China have expanded. There are various works that discuss INGO interactions with the state, like Michael Gunter and Ariane Rosen in “Two-Level Games of International Environmental NGOs in China” [9]. Other scholars study transnational support for local NGOs. For example, David Brown and Hu Xing in “Building Local Support for Chinese Civil Society with International Resources” [1]. Some scholars like Chen Jie focus on democratic functions of transnational activism [8].

The rise of environmental social activism and its relevance to contemporary Chinese politics has caught academic attention, and in turn, inspired a growing body of scholarly work. Many earliest empirical research and field reports (in English language) on voluntary-based associations in post-Mao China highlighted environmental NGOs. Environmental NGOs are among the most studied Chinese NGOs (in both Chinese and English languages) with regard to the status and development of civil society organizations. It is also this sector where we see the greatest potential for Chinese NGOs to impact state policies.

The aims of this study are to examine the origins and the expansion of environmental NGOs in China; to investigate the current status of international environmental NGOs in China and to understand ways and means in which international environmental NGOs in China engage with the government to influence the policies and decisions.

Presenting main material. The expansion of non-governmental organizations has been one of the most significant phenomena in the history of Chinese civil society in the past two decades. The birth and early development of China’s ENGO were caused by many factors: the government’s gradual political reforms, the flaws in environmental governance, concerns about environmental issues, increasing international interactions, and the efforts of influential elites. In recent years, popular environmentalism, the specialization of ENGO, the rise of the Internet, and the deteriorating environment have further strengthened ENGO’s support. Environmental NGOs can also help the government promote environmental education, conduct environmental and energy conservation policy research, and carry out ground protection and sustainable development projects.

However, Chinese traditional culture and political system are the major factors shaping ENGO in China. Emerging from interaction with politics and other fields, ENGO constitutes a new field where citizens can practice political skills, organize and participate in civic actions, and test political limits.

International NGOs have achieved remarkable success in their field of activity, perhaps because they keep their concerns within a limited area and their policies for interaction with the government are non-confrontational. This article is based on a study of some international environmental NGOs in China, which may help to further understand the status of international NGOs and the complex relationship between NGOs and the Chinese government.

An Overview of NGO History in China

There are three types of NGOs in China: the governmental NGOs, grass-rooted non-governmental organizations and international non-governmental organizations. Western NGOs are viewed as non-governmental organizations although they usually rely at least in part on government funding and occasionally work closely with government agencies. Han (2003) mentions that there are four stages of the development of an INGO in China:

1. The Opium War (1840) to the 1950s. At this stage, faith organizations and NGOs with religious background were the main actors.

2. From the 1950s to the 1970s. During this period, international NGOs were considered as an “imperial resistance force” and were excluded from China’s new regime.

3. From the 1970s to the 1990s. With the end of the Cultural Revolution, several international non-governmental organizations started to do business in China again. They started to actively participate in giant panda protection and disaster relief work.

4. From 1992 to present. With China’s entry into the WTO, international non-governmental organizations began to experience fast-paced development and expanded their fields of interest from education and charity to environmental protection, domestic violence, social equality, etc.

With 1978 reform of opening up, China did not just open the door to foreign investment, but also began to encourage international community to provide assistance for China's development [14]. Its interest in joining the international community and the rapidly growing influence of international civil society on global politics have promoted the penetration of international non-governmental organizations in China [13]. In addition, China's rapid economic growth based on a large amount of coal and oil consumption and its harmful effects on the environment and climate change, attracted environmentalists and activists from all over the world [2]. All these factors have led to the rapid growth of international non-governmental organizations activity in China.

In terms of the presence of international non-governmental organizations, environment is the second most important area. According to the CDB's database, the distribution of international NGOs on the territory of China is clearly uneven: most of them are located in the southwestern region and Beijing. According to Chen, the restrictive behavior of the Chinese leadership against the civil society of the richest provinces can explain why many INGOs are concentrated in poorer provinces such as Sichuan, Yunnan, Tibet, and Qinghai, while the Beijing offices are in direct contact with the central government [2].

Passed in 2016 China's Overseas NGO Management Law was considered the culmination of "China's long-term mistrust of foreign NGOs." The new law came into effect on January 1, 2017, requiring international NGOs to register with Chinese police and the Ministry of Public Security before starting their operation. Western governments and human rights defenders consider this to be a "move to restrict the already tight space for NGO operations" [3].

The Attitude of the Chinese Government toward International NGOs

Although in the 1950s the government generally believed that foreign development groups were unnecessary and dangerous, the growing social problems in the reform era proved that the first assumption is wrong. The current government follows the belief that international social groups are potentially dangerous, but it also realizes that a well-supervised NGO sector may become beneficial to the country and the people. The government regards these social organizations as "bridges" between the people and itself. Social groups also convey information from the people to the government. State leaders firmly believe that if social groups are carefully controlled, they can provide politically safe channels for people's voices to be heard. This two-way transmission of ideas strengthens the Party's control, at least in the short term, over the rapidly pluralizing society [6].

Lastly, the Chinese government can use social groups to get legitimacy and money internationally. The existence of foreign social groups helps China to gain more influence in the eyes of international community. China has benefited a lot from its open policy. It has realized that it cannot develop in isolation from the rest of the world and its development and prosperity are interrelated and interdependent with the entire world.

International non-governmental organizations play a special role in the international community,

and cooperation with them will undoubtedly further promote China's goals of the global recognition and influence. Therefore, the Chinese government realizes that the cooperation with international NGOs is a part of its opening-up and an inevitable factor in the pursuit of globalization [13].

Although recognizing the potential contribution of foreign social groups, the government still has not given up its fear of them. The Chinese government is concerned that some group members may abuse their visas and conduct the propaganda against the ruling Party. The state is trying to cultivate certain types of foreign NGOs and quell those NGOs which have a politically sensitive agenda. Only those foreign groups which have the same interests as the ones of the government are allowed to operate relatively freely within a certain range of parameters. The Chinese government actively welcomes foreign NGOs that operate in the fields of environment, health, education and services for the disabled. China's environmental protection departments generally have positive attitude towards environmental NGOs. The government believes these NGOs are capable of inspiring a large number of volunteers to act for a common cause in non-controversial areas, such as recycling, tree planting or anti-garbage projects.

Before there was no clear legal framework for INGOs' operation in China which reflects the government's tolerant attitude towards foreign NGOs. They were regarded as useful entities to solve China's development problems as long as they did not interfere with sensitive issues. However, the situation changed after the implementation of the "Law of the People's Republic of China on the Administration of the Activities of Overseas Nongovernmental Organizations within Mainland China".

First of all, the "Overseas NGOs" law refers to non-profit non-governmental social organizations legally established outside of mainland China operating in the fields of economy, education, science and technology, culture, health, sports, environment, poverty alleviation and disaster relief [18]. According to this law, all foreign NGOs (ONGOs) should be registered in China and should set up their representative offices, while unregistered ONGOs wishing to operate temporarily in China should be filed. Besides, ONGOs that have an intention to register, shall get a consent. They are also required to submit an annual report with all projects of an ONGO every year before the December 30th [18]. This report should be inspected first by the Professional Supervisory Unit, then should be sent to the registration management authorities.

Obviously, the implementation of this law is an attempt to make up for the lack of a legal framework to regulate international NGOs. However, one of the most discussed issues is the necessity to find the Professional Supervisory Unit. As for the environmental field, it should be noted that long-established ONGOs such as WWF or TNC have already received the legal status. They cooperate with the country's government to protect the Chinese environment. The fact that they registered their representative offices proves their significance in this process and shows that China intends to promote cooperation with the international community.

International ENGOS Operation in China

The main issues of Chinese environmentalism include water and air quality, the survival of endangered animal species, the damage of natural habitats and climate change. Since their establishment, International ENGOS have begun to carry out activities in many different regions to protect land, fresh water and oceans, as well as to respond to climate change and to improve the air quality in cities. In this article we will overview the projects and different strategies adopted by two major international ENGOS: Greenpeace and Wild Aid.

Greenpeace

Greenpeace is probably one of the most well-known environmental pressure groups globally. It strives to achieve its missions by reporting and raising awareness, public education and political lobbying. Greenpeace was established in 1969 and entered China in 1997. It opened its first office first in Hong Kong in 1997, then in Beijing in 2002 and Taipei in 2010. Issues that Greenpeace is working on in China include climate change, food security, oceans protection and fighting illegal deforestation. Greenpeace International monitors the performance of the China's office through the consultative international decision-making procedures [17]. Under the leadership of the project directors, local activists are responsible for the strategies and tactics of certain social marketing activities according to the Chinese context [17]. Local assistants, interns and volunteers were selected to work on every local project. Such local recruitment makes this international NGO even more localized and it may be more adapted to local culture.

In 1995 the staff members of Greenpeace were recalled from China after they protested against the nuclear tests held by the Chinese government. Greenpeace China tried to use campaign tactics similar to those adopted by Greenpeace subsidiaries in other international departments, through direct, non-violent and creative confrontational activities. However, the public protest failed to achieve its goals in China, because the Chinese government strictly controls national media. In most cases, the Chinese public cannot access information that the government considers harmful to its interests.

Since then Greenpeace has been very cautious about its activities in mainland China. Moreover, Greenpeace organized international campaigns to support China's interests. For example, it organized protests in Hong Kong against biopiracy and the dumping of toxic waste in China by other countries.

Greenpeace's overall strategies were to carry out activities to influence national policy through sponsored research and to influence public opinion on biosafety through media campaigns [7]. Greenpeace began its media campaign against Nestle in mainland China in the end of 2002. By contacting an online news service, Greenpeace informed the Chinese media that although Nestle had promised not to sell products containing genetically engineered ingredients in Europe and the United States, it was selling these products in China. Greenpeace accused Nestle of deliberately deceiving consumers and adopting different standards to consumers in different countries.

In 2004 Greenpeace launched a campaign that successfully influenced China's wind energy pol-

icies. The most important strategy adopted by Greenpeace in this campaign is close cooperation with the government industrial association, China Renewable Energy Industrial Association (CREIA). Due to the relationship with CREIA, Greenpeace China got the permission from the Energy Bureau (the government's agency which is responsible for energy-related policies) and could participate in the decision-making process.

Based on its experience in carrying out similar activities in other countries, Greenpeace China began to educate Chinese people, especially the well-educated part, through various activities about climate change and the need to replace fossil fuels with renewable energy. In order to promote its ideas to the industry and the government, Greenpeace formed an international wind energy expert team. Then, it participated in the 2004 Asia International Renewable Energy Expo, the outstanding industrial event held in Beijing. Greenpeace's booth at this Expo attracted more attention from people from the government, academic and media representatives than Greenpeace had expected.

Following its success at the Renewable Energy Expo, Greenpeace China continued to expand its scope of activities regarding the energy issues. A five-member team was appointed and a campaign called "Wind Energy" was officially launched. Then it expanded due to its fruitful cooperation with CREIA. Greenpeace was also able to improve its participation in policy-making process. In February 2005, the Renewable Energy Law was finally approved at the 14th session of the Standing Committee of National People's Congress. For Greenpeace China this was a huge success.

To sum up, based on the experience of Greenpeace, we can make a conclusion that international NGOs can affect government policies in China, but an important condition is to get access to government officials. Another vital condition is cooperation with appropriate local industrial association. Besides, international expos and fairs may become one option for international NGOs to attract attention to their projects. They can also find ways to educate people in order to get informed supporters of their actions.

WildAid

WildAid is an international wildlife conservation group with offices in the USA, Canada, China, India, Ecuador, Indonesia and the UK. It is the only organization dedicated to consumer-oriented awareness and education activities aimed at reducing the demand for endangered and threatened wildlife products.

WildAid set up its office in China in 2004 and signed a cooperation memo with State Administration of Forestry. Since that time, the NGO carried out series of education activities on the protection of wild animals and plants in China. It also cooperated with the Agricultural Ministry to launch China National Aquatic Wildlife Conservation Awareness Month with National Aquatic Wildlife Conservation Association.

The key strategy adopted by WildAid is the communication model. It creates quality PSAs that secure partnerships with leading media, government leaders and on-screen celebrities. WildAid is committed to eliminating the demand for products from

endangered species to prevent the extinction of these species. By creating PSAs that require consumers not to buy these products, WildAid re-adopted one of the most effective means of communication. Through an established and extensive media partner network, including CCTV, PSAs are broadcasted for free throughout the Chinese market.

One of the main victories of WildAid in China is 2017 ban of domestic ivory trade. WildAid Ambassador Yao Ming was critical in pushing public and the government to implement the ban. Media campaigns often have an impact on changing public attitudes. In 2006 the similar campaign resulted in the decrease in the consumption of shark fin. With the help of Yao Ming, WildAid spread awareness of shark fin soup consumption in China. The NGO report in 2014 showed that shark fin sales in Guangzhou (the trade center) dropped by 82%, while prices also decreased significantly, indicating a drop in demand [15].

Besides, 85% of respondents in the online survey conducted by WildAid claimed that they abandoned the consumption of shark fin. Most respondents think advertising campaign was the reason for this. Thus, the use of media helped to educate the public and attract its attention to an important issue. Many Chinese consumers did not realize that shark fin soup used shark fins as a raw material. Therefore, WildAid continues to pursue public awareness and to promote empathy for animals.

Suggestions for international NGOs in China. When an international NGO enters China, it may first consider register officially as an NGO. Even if the unregistered status can protect an NGO from most Chinese government regulations, official registration will help to gain more rights and to get access to more activities which are not available otherwise. Besides, official registration will help to establish better and more trustful relations with the central government.

The next step is to establish appropriate partnerships. In order to influence the government or specific target audiences in China, an NGO should cooperate with an appropriate industrial or academic association. With the help of right partners, NGOs may obtain access to key issues, cooperate with government officials, and obtain their approval. Another effective strategy is launching a successful social marketing campaign. In order to benefit the communities, NGOs need to find innovative ways to promote public participation through various potentially useful channels, including non-traditional methods such as social media.

An international NGO in China should also strengthen partnerships with the local as well as international NGOs in order to demonstrate the

value in China and increase the impact on decision-making when appropriate.

Conclusion. Global warming and climate change are quickly becoming major issues in global politics and the top issues in the internal affairs of many countries including China. The presence of international NGOs in China has promoted renewed attention to the harmful environmental impacts of coal and oil consumption for decades, as well as improved contacts with international agencies and other organizations. For China, the presence of international NGOs means improvement of professional knowledge and the implementation of advanced technology.

Environmental NGOs have played an important role in the political structure of the Chinese government. Environmental NGOs have affected government decisions to address environmental policy initiatives. Their massive allocation of funds and connection with the international community have also helped the rise of Chinese civil society and increased public awareness. They also suggest new ways to protect the environment.

International environmental NGOs have used different strategies to operate in China. Two strategies are particularly important: cooperation with government agencies and self-censorship. Although Greenpeace protested against the Chinese government before entering mainland China, neither NGO had publicly criticized the Chinese government since they established their offices in mainland China. Besides, it is important for an international NGO operating in China to self-censor their activities by focusing them only on environmental issues and by avoiding any politically sensitive problems.

However, from the perspective of the Chinese leadership, as democratic organizations which are independent of the government, international NGOs may also pose a threat to national security and domestic interests. The implementation of the the “Law of the People’s Republic of China on the Administration of the Activities of Overseas Nongovernmental Organizations within Mainland China”, created new regulations for INGOs which wished to conduct activities in China. This obviously represents an attempt by the Chinese leadership to close the legal gap and to subject international NGOs to stricter scrutiny and controversy.

Therefore, although Western civilization has affected the vigorous development of the Chinese government, its role in the government decision-making is still limited. It is clear that international NGOs operating in China cannot perform the advocacy role played by them and their peer organizations in other countries because of China's weak civil society and political restrictions.

References:

1. Brown, D., Xing, H. (2012) Building Local Support for Chinese Civil Society with International Resources. *Voluntas*, vol. 23, no. 3, pp. 711–33.
2. Chen, J. (2010) Transnational environmental movement: impacts on the green civil society in China. *Journal of Contemporary China*, vol. 19, no. 65, pp. 503–523.
3. Feng H, Zhang Q. (2018) Legitimization Communication Tactics of Environmental NGOs in China: A Case Study of Greenpeace. *Global Media Journal*, vol. 16, no. 31, pp. 1–9.
4. Gunter, M., Rosen, A. (2012) Two-Level Games of International Environmental NGOs in China. *William and Mary Policy Review*, vol. 3, no. 270, pp. 70–94.
5. Ho, P. (2001) Greening Without Conflict? Environmentalism, NGOs and Civil Society in China. *Development and Change*, vol. 32, pp. 893–921.

6. Howell, J. (1994, June) Refashioning state-society relations in China. *European Journal of Development Research*, vol. 6, no. 1, pp. 197–215.
7. Jiang, R. (2004). *Environmental NGOs in China: the Interplay of State Controls, Agency Interests and NGO Strategies*. (PhD Thesis), Guangzhou: South China Normal University.
8. Jie, C. (2012) *Transnational Civil Society in China: Intrusion and Impact*. London: Edward Elgar.
9. Kang, X. (1999) *Power Shifting: The Change of China's Power Structure During a Time of Transition*. Zhejiang: Zhejiang People's Publishing House.
10. Knup, E. (1997) Environmental NGOs in China: An overview. *China Environment Series*, vol. 1, pp. 9–15.
11. Liu X., Wang J. (2009) The NGO Force and its Influence in Governmental Overseas Communication-an Observation on Western NGO's Permeation Effects in China. *Journalism Quarterly*, no. 1, pp. 105–109.
12. Ma, Q. (2002) The Governance of NGOs in China Since 1978: How Much Autonomy? *Nonprofit and Voluntary Sector Quarterly*, vol. 31, no. 3, pp. 305–328.
13. Ma, Q. (2006) *Non-Governmental Organizations in Contemporary China – Paving the Way to Civil Society?* New York, NY: Routledge.
14. Shieh, S. (2012) Special Report: the roles and challenges of international NGOs in China's development. *China Development Brief*. Available at: <http://chinadevelopmentbrief.cn/publications/special-report-the-roles-and-challenges-of-international-ngos-in-chinas-development/> (accessed 10 January 2021).
15. Whitcraft, S., A. Hofford, P. Hilton, M. O'Malley, V. Jaiteh, and P. Knights (2014) *Evidence of Declines in Shark Fin Demand, China*. San Francisco, CA: WildAid.
16. Yang, G. (2005) Environmental NGOs and institutional dynamics in China. *The China Quarterly*, no. 181, pp. 46–66.
17. Greenpeace East Asia (2009) *Greenpeace East Asia Annual Report 2009*. Available at: <http://www.greenpeace.org/raw/content/eastasia/press/reports/annual-report-2009.pdf> (accessed 5 February 2021).
18. Art. 2, 3, 9, 19, 31 of the "Regulations on the registration and management of social groups" and art. 11 of the "Law of the People's Republic of China on the Administration of the Activities of Overseas Nongovernmental Organizations in Mainland China".