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# Campaign-Style Enforcement and Regulatory Compliance

**Abstract:** *This article examines the recoupling mechanism of campaign-style enforcement and its effects on environmental regulatory compliance. Drawing on the policy implementation literature and institutional theory, the authors develop a conceptual model of campaign-style enforcement in which both resource mobilization and power redistribution are theorized to address decoupling problems in regulatory compliance. The two-pathway recoupling mechanism is evidenced by an empirical investigation of the implementation of China's energy conservation and emission reduction policy as part of that country's 11th Five-Year Plan. Findings suggest that campaign-style enforcement can effectively improve regulatory compliance when it addresses the efficiency/legitimacy conflict by providing policy incentives and reorganizing a clear hierarchy of political authority. The article concludes with a discussion of the strengths and limitations of campaign-style enforcement.*

## Practitioner Points

- Campaign-style enforcement is a type of policy implementation involving extraordinary mobilization of administrative resources under strong political sponsorship to effectively address the decoupling problems in regulatory enforcement and compliance.
- Campaign-style enforcement is usually adopted when regular enforcement fails and urgent tasks require timely responses.
- Effective campaign practices may have long-term legacy to accelerate the pace of political and legal involvement towards better governance structures and regulatory outcomes.
- Policy makers should understand both the strengths and the possible limitations of campaign-style enforcement for effective adoption.

How to control environmental pollution has become a pressing policy issue faced by the Chinese government. After more than 30 years of rapid economic development, the country has witnessed deteriorating environmental quality, mainly as a result of its poor performance in controlling industrial pollution (Economy 2010; Lora-Wainwright 2013). From 2001 to 2005, for example, industrial sulphur dioxide (SO<sub>2</sub>) discharge increased by 28 percent, while smoke dust emissions decreased by only 0.5 percent (the original national policy target was a 10 percent decrease of both pollutants).<sup>1</sup> Surprisingly, substantial progress was seen from 2006 to 2010, with SO<sub>2</sub> and smoke dust emissions reduced by 27 percent and 49 percent, respectively. One possible explanation for this remarkable progress, as identified in recent studies, is that adoption of campaign-style enforcement of the energy conservation and emission reduction (ECER) policy under China's 11th Five-Year Plan (FYP) significantly reduced industrial air pollution (Cao, Garbaccio, and Ho 2011; Zhao and Ortolano 2010).

As documented in the literature, various forms of enforcement campaigns have been staged in many countries to achieve pressing policy goals, such as road safety (Rundmo and Iversen 2004; Tay 2005), the war on drugs (MacCoun and Reuter 2001), anti-corruption (Wedeman 2005), and counterterrorism (May, Workman, and Jones 2008). The existing literature has identified common characteristics shared by these enforcement campaigns, namely, a high degree of urgency, a temporary initiative, a tightly coordinated operation, and a clearly defined goal (Biddulph, Cooney, and Zhu 2012; Li and Foster 2008; Van Rooij 2006; Zhou 2012). Following the literature, we define *campaign-style enforcement* as a type of policy implementation involving extraordinary mobilization of administrative resources under political sponsorship to achieve a specific policy target within a defined period of time. Such campaign practices may be either short term or sustained for a prolonged period of time, and they may even be institutionalized as routine enforcement measures at the end of the campaign. Campaign-style

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enforcement is usually adopted when regular enforcement fails because clearly defined goals are incompatible with other policy goals or when urgent policy tasks require timely responses (May, Workman, and Jones 2008; Zhou 2012). In this regard, campaign-style enforcement fits the political implementation scenario in Matland's (1995) ambiguity-conflict model of policy implementation. Unlike administrative implementation, which is largely routine based and resource determined, campaign-style enforcement achieves its goal through both resource sufficiency and power adequacy (Matland 1995). However, how these two factors affect the short- and long-term outcomes of a campaign remains unaddressed in the literature.

In China, the adoption of campaign-style enforcement can be traced back to feudal times and has retained its prevalence in today's state governance (Zhou 2012). In the reform era, examples abound of campaigns to stage fights against general criminal behavior (Strike Hard, see Tanner 2005), to address problems inside the Communist Party (anticorruption, see Manion 2004), and to rectify failures in economic and environmental regulation (Biddulph, Cooney, and Zhu 2012). Such frequent use of campaign-style enforcement is not only attributable to the aforementioned general causes, as suggested in the policy implementation literature, but also closely related to the absence of a rule of law tradition and the presence of a top-down political structure in China (Zhou 2012).<sup>2</sup> In this authoritarian setting, the effectiveness of the legal regime and the bureaucratic system depends largely on political demands rather than rules and administrative procedures (Tanner 2005). For instance, environmental governance in China usually features sporadic campaign efforts to step up loose regulatory enforcement (Li and Foster 2008). Although the existing literature has acknowledged the importance of campaign-style enforcement (Van Rooij 2006), we still know little about the ways in which it helps achieve positive policy outcomes given the aforementioned general and specific causes.

The current literature does not provide sufficient insights into the mechanisms involved in campaign-style enforcement and therefore calls for both theory building and empirical explorations. For example, in what ways do campaign efforts balance the conflict between environmental legitimacy and economic efficiency? How do administrators and regulatees perceive and respond to campaign efforts? To what extent does it leave positive legacies to improve future policy implementation instead of reinforcing the lack of a rule of law tradition? Without an understanding of the precise mechanisms of campaign-style enforcement, it is difficult to evaluate its short- and long-term efficacy.

This article seeks to address these research questions by first developing a conceptual model of campaign-style enforcement in environmental regulation. Drawing on the policy implementation literature and institutional theory, we theorize that *campaign-style enforcement* recouples loosely connected regulatory demands and enforcement and compliance practices through complementary use of resource mobilization and power redistribution. The central premise of our recoupling model is that economic efficiency in enforcement and compliance is enhanced through resource

mobilization, while both regulatees' and administrators' perceptions of environmental legitimacy are strengthened through power redistribution. We apply this model to analyze the implementation of the ECER policy in the coal-fired power sector, particularly emission reduction, between 2007 and 2010 in China. ECER can be understood as an ultimate goal in energy savings and pollution control or a policy implementation process to achieve this goal. In this article, we treat the implementation of ECER as a case of campaign-style enforcement mainly because it featured unprecedented efforts on the part of the party-state and regulatory agencies to achieve a clear environmental policy goal within a short period of time.

The rest of the article is organized as follows: We first review existing theories and develop a conceptual model of campaign-style enforcement. We then introduce the research methodology and data collection, followed by the presentation of empirical findings. The article concludes with a discussion of the research and practical implications.

### The Recoupling Mechanisms and the Effect of Campaign-Style Enforcement

In this article, we focus on the recoupling mechanisms through which campaign-style enforcement can address the decoupling problems in environmental regulatory compliance. As suggested by the "rational myth" theory, decoupling (loose coupling) is a key organizational solution to address the "legitimacy-efficiency" conflict in complying with regulations, mainly by building and maintaining gaps between symbolically adopted formal policies and actual business activities (Meyer and Rowan 1977; Tilcsik 2010). In practice, misconduct attributable to decoupling is common in environmental governance. On the one hand, polluting enterprises usually create the appearance of complying without actually doing so (Westphal and Zajac 2001). One example is the weak implementation of voluntary environmental programs. For instance, joining a program such as ISO 14001 may become a ceremonial action when an enterprise's adoption is mainly aimed at serving legitimacy purposes rather than addressing efficiency concerns (Boiral 2007).<sup>3</sup> On the other hand, local governments may tolerate or even encourage corporate decoupling behaviors (Marquis, Zhang, and Zhou 2011). In China, the priority of economic growth over pollution control has led to lax enforcement and sometimes even collusion between regulators and regulatees (Konisky 2008; Zhan, Lo, and Tang 2014).

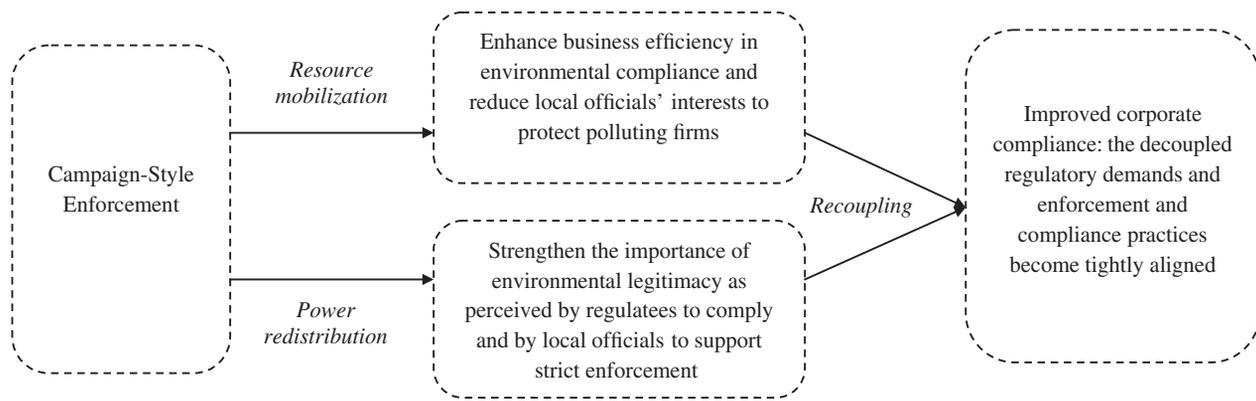
To address decoupling misconduct, a recoupling strategy can be adopted to reshape the behaviors of regulatees (Espeland 1998; Hallett 2010; Kelly and Dobbin 1998). In their study examining corporate compliance with antidiscrimination laws, for instance, Kelly and Dobbin (1998) found that the tightening up of federal enforcement effectively forced firms to hire specialists to design compliance programs. The recoupled law mandates and compliance practices were sustained even when the federal enforcement budget was later cut.

By extending the recoupling perspective to the political implementation process, we develop a conceptual model of campaign-style enforcement with two recoupling pathways (see figure 1). The first

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**Figure 1** The Recoupling Process and Effects of Campaign-Style Enforcement

pathway promotes the organizational efficiency of regulatees to improve compliance and reduces the interests of local government to protect polluting firms through massive resource mobilization. Corporate decoupling appears partly because environmental compliance activities are pure costs from the point of view of profit maximization. Meanwhile, regulatory decoupling also exists because the decentralized fiscal system in China stimulates local governments to protect polluting firms by restricting environmental bureaus' budgets and personnel and, in extreme cases, by hinting at loose environmental enforcement (Zhao and Ortolano 2010). To relieve these financial constraints, campaign-style enforcement relies on its remarkable capability to prioritize and mobilize legislative, administrative, propaganda, and fiscal resources (Moynihan 2009; Van Rooij 2006; Zhou 2012).

The second pathway strengthens the importance of environmental legitimacy as perceived by regulatees to improve firm-level compliance and by local officials to support strict enforcement within their jurisdictions through power redistribution. This pathway follows the principle of “power” in determining the outcome of political implementation when high policy conflict is present (Matland 1995). The mechanism here lies in the principal-agent theory, namely, that the greater the principal's authority (after power redistribution) to demand agent actions, the greater the likelihood that the agent's conformance will follow.

Power redistribution is of particular importance in China's environmental governance because of the dominant bureaucratic norm of respect for authority (Lockett 1988; Ma and Ortolano 2000). As an unwritten code, it is widely accepted that the higher the bureaucratic position, the more authoritative the person in that position is. For example, it has been a routine practice to increase the bureaucratic rank and commensurate size of environmental agencies to elevate their authority (Jahiel 1998). This is because a major challenge to China's environmental enforcement is the divergence in policy priorities between local governments and specialized environmental protection bureaus (EPBs) (Economy 2010). Local officials may be reluctant to support strict enforcement of pollution control regulations because of a higher priority of economic development over environmental protection. This policy divergence within the bureaucracy

is unlike what has been observed in Western democracies, where political divergence in policy implementation is usually defined as a divided legislature (Oosterwaal and Torenvlied 2012). Therefore, central political leaders' environmental commitment is critical because it affects the power balance among government agencies and signals policy priorities for local officials and business entities to follow (Harrison and Kostka 2014; Lo and Fryxell 2003).

Overall, as indicated in figure 1, through the two recoupling pathways—resource mobilization and power redistribution—the once decoupled (or loosely coupled) regulatory demands and enforcement and compliance practices can be tightly aligned in the end. This model will be used to analyze the implementation of the ECER policy in the coal-fired power industry in China.

## Research Methods

### Research Context

The failure to achieve the 10th FYP pollution control targets and falling behind schedule with regard to the 11th FYP targets in 2006 and early 2007 led to the direct involvement of the Central Committee of the Communist Party of China in environmental protection (Xu 2011). In June 2007, the State Council of the People's Republic of China promulgated the ECER guideline. One month later, a high-profile ECER team was established, headed by Premier Wen Jiabao and with all of the cabinet ministers as team members.<sup>4</sup> During the first team meeting, the premier called for intensifying efforts in an “uphill battle” to curtail energy consumption and pollution emissions over the next four years. These high-profile political actions marked the beginning of the campaign-style enforcement of ECER nationwide between 2007 and 2010.

The coal-fired power industry is an appropriate empirical setting in which to illustrate how campaign-style enforcement has brought substantial reductions in emission levels. As a major contributor to industrial SO<sub>2</sub> pollution, this industry is the most heavily targeted to achieve the emission reduction goals of ECER. In the same month that the State Council promulgated the national ECER guideline, the National Development and Reform Commission (NDRC) and the former State Environmental Protection Administration (SEPA; now the Ministry of Environmental Protection) jointly

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Local officials may be reluctant to support strict enforcement of pollution control regulations because of a higher priority of economic development over environmental protection.

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drafted a provision of “desulfurization facilities operation and price premium.” The Big Five power groups, which accounted for 30 percent of national industrial SO<sub>2</sub> emissions in 2005, were required to make reductions ranging from 27.6 percent to 44.9 percent by 2010. Both general and industry-specific campaign-style enforcement practices were adopted and achieved a tremendous effect. By the end of 2010, about 80 percent of the coal-fired power units in the country had installed desulfurization equipment (compared to a mere 12 percent in 2005). Meanwhile, the total industry SO<sub>2</sub> emissions were reduced by 29 percent, a great reduction compared to the level in 2005.

### Data Collection and Analysis

In this article, we are interested in both business and government officials’ perceptions of the process and effects of campaign-style enforcement. Therefore, we adopted a case study method and conducted interviews with both power plant managers and related central and local government officials. Data were collected primarily from two sources: archival documents and in-depth interviews. As the ECER policy was implemented nationwide, changes in policy implementation and industrial performance were closely followed by the national media. We thus consulted policies and regulations published by the government, relevant online articles from *Xinhua News* and *People’s Daily*, and hard copies of *China Environmental News* (2006–10).

Between March 2009 and January 2010, we conducted face-to-face, semistructured interviews with top executives and environmental managers at 10 selected plants. To reduce self-selection bias, we adopted several criteria to select a representative firm sample that varied in terms of organizational features and regulatory contexts. For example, we picked both large plants and small to medium-sized plants in four provinces (Guangdong, Hubei, Hunan, and Hebei), among which the coastal province of Guangdong was usually considered to have a higher degree of environmental proactiveness (Yee, Lo, and Tang 2013). We also selected plants built between the 1930s and 2007 to cover a wide range of firm vintage,

particularly given that the environmental bar had been raised for plants built after 2004. In terms of ownership, we chose to focus on state-owned enterprises but also included several other ownership types, as the power industry in China is predominantly government-controlled (accounting for around 96 percent of the total generating capacity).<sup>5</sup>

After these screening procedures, we then arranged firm interviews with the help of the authors’ personal contacts and the local EPBs. A total of 10 power plants were selected for this study, as it became evident during the data collection process that few new ideas were emerging. Table 1 summarizes the profiles of the individual power plants. For reasons of confidentiality, we refer to these facilities as firm 1 to firm 10. Each interview lasted around two hours, with questions focusing on improvements in environmental performance, compliance pressures, and motivations. We did not use the term “campaign-style enforcement” in the interview design because of its political sensitivity. Instead, we raised questions related to ECER policy implementation and asked for examples and stories whenever interviewees mentioned political interventions. To further confirm the reliability of respondents’ answers, we triangulated some plants’ answers with those from other plants in the same location.

After all of the fieldwork at the power plants was completed in early 2010, we interviewed officials in environmental agencies, including both the local environmental protection bureau (Guangzhou EPB) and the Ministry of Environmental Protection (MEP) in Beijing, as they were the leading agencies in the emission reduction campaign. In 2014, follow-up interviews were conducted with officials from the most engaged nonenvironmental authorities in ECER implementation, namely, the local and national Development and Reform Commission (Guangzhou and Beijing), as well as the local Economic Commission (Guangzhou). We asked the interviewed officials to evaluate the overall implementation of ECER and specific changes in the power industry’s emission reduction since 2007, as well as the deciding factors for improvement. Findings

**Table 1** General Profile of Interviewed Power Plants

Firms	Built Year	Size (generation capacity)	Ownership	Interviewees	Environmental Records
1	1990s	2400MW	State-owned enterprise (SOE)	Environmental manager (EM)	FGD system built between 2007–08 to reduce SO <sub>2</sub> pollution; built an ecosystem that makes full use of raw materials and by-products
2	1970s	1840MW	SOE	EM and one employee	FGD system built in 2005–06; closed down small polluting units in 2007 and 2008
3	1960s	60MW	SOE	EM	Voluntarily built FGD system and closed down small-scale units in 2000
4	2007	600MW	SOE	EM	FGD system built in 2007
5	1930s	200 MW	SOE	EM and two employees	FGD system built in 2008; closed down small-scale units in 2008
6	1990s	2400 MW	SOE	EM and the chief engineer	FGD system built in 2008; closed down small-scale units in 2007 and 2008, more than required by the local policy
7	1990s	400MW	Joint-venture	EM	FGD system built in 2004; built a wastewater treatment plant in 2004; received “green company credit” from the local EPB in 2008 and 2009
8	1980s	250MW	SOE	EM	FGD system built in 2005; received “green company credit” from the local EPB in 2007 and 2009
9	1990s	250MW	Private-owned	Vice-president (in charge of environmental issues)	Voluntarily built FGD system in 2001; the first power plant in the province to use a selective noncatalytic reduction (SNCR) approach in 2006 to reduce NO <sub>x</sub> pollution; received “green company credit” from the local EPB from 2007 to 2009
10	1980s	97MW	SOE	General manager (in charge of environmental issues)	FGD system built in 2004; SNCR built in 2010; Cleaner Production certification in 2008; received “green company credit” from the local EPB in 2007 and 2009

from a total of nine interviews with 12 government officials (including a focus group with three Economic Commission officials in Guangzhou) served to capture regulators' perspectives on the implementation of ECER and to triangulate responses from the interviewed power plants.

Data analysis consisted of coding and triangulation among different data sources. We first coded the interview data in accordance with our research focus—campaign-style enforcement and its effects on regulatory compliance. We measured a firm's compliance progress during the implementation of the ECER policy by identifying whether it had installed pollution control facilities to effectively reduce air pollutant emissions. We mainly focused on power plants' efforts to curtail pollution rather than their energy conservation measures because the target for the latter in this sector was specified in the Energy Conservation Law and the 11th Five-Year Guideline of Energy Development rather than the ECER guideline. These self-reported data were compared with official statistics from multiple sources in order to validate our findings. To capture how campaign-style enforcement contributed to this progress, we conducted a comparison of regulators' and regulatees' perceptions. Table 2 provides a summary of the comparisons.

## Findings

Overall, we identified considerable effects of campaign-style enforcement in air pollution control in power plants between 2007 and 2010. As shown in table 2, all 10 plants installed end-of-pipe facilities to deal with SO<sub>2</sub> pollution prior to 2008. Two plants (firms 1 and 6) pointed out that they had even gone beyond the regulatory requirements by installing highly efficient pollution control equipment. At the same time, proactive engagement in resource recycling and reutilization was also found. All respondents indicated either that they had achieved zero wastewater discharge or that they were on their way to accomplishing this goal. When asked how these changes had taken place, the environmental manager of firm 1 said that “our willingness to make changes does not matter; what matter are government instructions.” Firm 3 indicated that “if it were not mandated by the central government, I think it would be hard for a profit-seeking enterprise to invest hundreds of millions of RMB [renminbi] in environmental protection.” In the next section, we provide more details on the recoupling process and the effect of campaign-style enforcement, followed by how they vary across regions and firms.

## Understanding the Recoupling Process and the Effect of Campaign-Style Enforcement

To reduce pollution emissions in the power sector, the first recoupling pathway of campaign-style enforcement involves massive resource mobilization, which is an incentive approach accompanied by a strong monitoring and sanctioning mechanism. We found that the provision of an economic stimulus package, including direct subsidies and a performance bonus, greatly enhanced corporate willingness in air pollution control. For instance, the central government either waived the loan interest for corporate spending on flue gas desulfurization (FGD) projects or covered these expenses using central environmental funds. In addition, an innovative “green electricity” policy offered a 0.015 yuan (US\$0.0023) price premium per kilowatt-hour to power plants that installed an FGD system. An operational priority to get connected to the electrical grid was also promised to these plants when there is an oversupply in the electricity market.

These financial incentives in the State Council's provision of “desulfurization facilities operation and price premium” were welcomed by many plants because they relieved the financial burden of compliance (firms 1, 2, 4, 5, 6, 7, 9, and 10). The effectiveness of financial support was pinpointed by all interviewed officials, with one further suggesting that the price leverage tool appeared to work better than command and control instruments (e.g., emission standards) because “the latter may only command minimum compliance, but monetary incentives can encourage firms to go beyond compliance” (official B). In local environmental governance, because pollution control cost was now partly compensated by specified environmental funds or market adaptation (e.g., the increased market price for green electricity), local officials had weak fiscal incentives to protect polluting industries. The following description provided by official A illustrates these behavioral changes among local political leaders:

Last year we organized a special inspection program in the electroplating industry to reduce local air pollution. In response, the targeted companies invited the city mayor to visit the industry, believing that the local government would ensure the continuation of their businesses. Contrary to their expectations, the mayor unequivocally conveyed the message that all polluting plants must be shut down immediately because their GDP [gross domestic product] contribution did not compensate for the costs of environment degradation. With the support of the mayor, we have successfully closed down these polluting plants.

**Table 2** Comparison of Regulatees' and Regulators' Perceptions of Compliance Progress and Determinants

	Corporate/Industrial Compliance Progress	Recoupling Mechanisms	
		Resource Mobilization: Incentives and Strict Monitoring and Sanctions	Power Redistribution: Function within the Bureaucratic Norm of Respect for Authority
Regulated Enterprises	(1) All firms achieved considerable progress in energy saving and SO <sub>2</sub> emission reduction during the 11th FYP (2) Noticeable progress since 2007	(1) Subsidies provided by government (2) High violation risk: penalties and administrative punishment for managers	(1) Premier took charge as a result of regulatory failure during the 10th FYP (2) Local EPBs became more powerful in regulatory enforcement (3) Firms' top executives bear more responsibility for corporate environmental performance
Regulatory Officials	Remarkable progress during 2007–08 with the premier in charge of the implementation of ECER	(1) Strict and diversified enforcement (2) Implementation of legal, market, and administrative approaches (3) New policy approaches such as the “price premium”	(1) Premier was in charge and local governments were responsible for local environmental quality (2) Empowerment of SEPA and local EPBs; emerging interagency cooperation, with agency accountabilities clarified (3) At the local level, the leading role of the provincial governor and city mayor is critical

In addition to substantial financial input, the ECER campaign also mobilized considerable administrative resources in monitoring and enforcement. The aforementioned incentives were used in combination with strict monitoring and sanctioning schemes to minimize symbolic compliance. For instance, power plants were required to pay a huge pollution fee if they failed to install the FGD system. They might face a penalty five times more than the funding for FGD installation awarded by local EPBs if the amount of SO<sub>2</sub> emission reductions was found to be below 80 percent of the target. Meanwhile, reinforced on-site inspections and the installation of an online around-the-clock monitoring system also made sure that facilities were not only in place but also properly operated (officials A, B, and C). In addition to the EPB's enforcement actions, intensive joint inspections undertaken by environmental and nonenvironmental agencies took place (officials D, J, and K). Respondents in power plants indicated, "We do not cheat because various enforcement instruments have now made violations easier to detect, and we can't afford the huge fines" (firm 7).

The second recoupling pathway is built on power redistribution to strengthen both regulatees' and local officials' perceptions of environmental legitimacy. This recoupling effect is realized based on the deeply rooted bureaucratic norm of respect for authority in individual and organizational decision making. For example, when we asked one manager (firm 5) whether the plant had any plans to deal with the increasingly stricter regulation, he said, "even though we have good ideas for further improvement, it is still the instructions of government and higher-level corporate executives that actually count."

Overall, our respondents reported three major changes in the political and regulatory power structure that strengthened their perceptions of the legitimacy of environmental protection: (1) top political leaders' expressed concerns and obligations with regard to environmental issues, (2) the empowerment of environmental bureaus at different levels, and (3) the strengthening of local political leaders' accountability for jurisdictional ECER performance and business managers' accountability for their firms' environmental performance. First, top political leaders' gestures and messages on environmental protection drew serious attention from both regulated firms and local governments to battle against pollution. Unlike previous environmental campaigns, the ECER campaign started with substantial changes in the regulatory power structure. It was launched by the State Council with a guideline prepared by the highly regarded NDRC rather than the SEPA, which ranked relatively lower in the state bureaucracy. It was also the first time that the premier had served as the director of a superministerial campaign team with (vice) ministers from all cabinet ministries as team members.<sup>6</sup>

All of these unprecedented efforts sent a powerful signal that the ECER had rallied supreme political support to take serious action to combat pollution. A clear message demanding strict industrial conformance was hence passed rapidly from the central government to governments at all other levels and, ultimately, to individual power plants. On the one hand, local governments closely followed the central government's steps in launching this campaign in their jurisdictions. In the four provinces we

studied, ECER leading teams headed by provincial governors were set up within one month of the establishment of the central leading team. Meanwhile, local ECER guidelines were also drafted and promulgated promptly in order to implement the State Council's plan (officials G, E, and F). Enhanced local government effort was also manifested in an increasing number of local environmental orders and decrees after 2007 (e.g., in Hubei, this number rose to 56 in 2007–08, while only four decrees had been released annually during the 2000–2006 period).

On the other hand, regulated enterprises were also able to comprehend the authority and read the urgency of this campaign. One respondent noted that "because the premier is now in charge, we feel strongly that any resistance to the campaign would be futile" (firm 2). The EPB officials we interviewed also confirmed this cognitive change:

Environmental protection was always a tough task for us until it became a part of the central leaders' policy agenda. In 2006, the premier emphasized in his Government Work Report that the country had achieved all FYP targets except those related to pollution control. Since then, both local governments and regulated enterprises in Guangdong have begun to pay more serious attention to this issue. Therefore, there is a brand new interpretation of the "long-standing problem" today, namely that any problem can be solved if central political leaders clearly indicate their concern. (official A)

Second, respect for authority means that one has to be subservient to higher-ranking governmental authorities. The former SEPA was accorded a lower bureaucratic status in comparison with other cabinet ministries under the dominance of the development-oriented national strategy, which constrained its ability to secure cooperation from powerful commissions and ministries (Kostka and Hobbs 2012; Xu 2011). For instance, many environmental goals set in the 10th FYP were outside the jurisdiction of the SEPA because of the politically centralized and fiscally decentralized system (Zhang and Crooks 2011). In the power sector, some state-owned companies are beyond the administrative control of local EPBs because of their higher bureaucratic rank.

In 2008, the subministerial-level SEPA was elevated to the cabinet-level Ministry of Environmental Protection (MEP). This administrative upgrade has greatly helped the MEP assert its authority over environmental governance. On the one hand, the new bureaucratic structure has reduced the policy inconsistencies among cabinet ministries that regulated firms used to face. Instead of considering environmental protection a less important policy issue, as in the past, enterprise executives now attach greater importance to their firms'

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Power plants commit to compliance with the expectation that they might be subject to less frequent inspections in the future or that they will be accorded priority in the allocation of environmental funds.

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environmental legitimacy in the eyes of local EPB officials (firms 6 and 9). In addition, reciprocal expectations in compliance and enforcement have begun to emerge between regulatees and EPBs. Power plants commit to compliance with the expectation that they might be subject to less frequent inspections in the future or that they will be accorded priority in the allocation of environmental funds. This cognitive change is evidenced by this

statement by a vice president in charge of corporate environmental management (firm 9):

It is important to convince the EPB that we are doing a good job in pollution control. Our experience shows that this “good apple” image does help. For example, the pollution fee collected by the enforcement agency should be partially returned to individual enterprises for further environmental improvement. If we are grouped in the “good companies” category, there is a greater chance that our funding application will be considered favorably by the local EPB.

On the other hand, local EPBs have become more empowered than before. Provincial EPBs in the four provinces we visited were upgraded to Departments of Environmental Protection (*Huanbaoting*) by 2009. In Guangdong, the upgrade of the provincial EPB to a higher administrative level in mid-2009 resulted in the enlargement of staff establishment in city EPBs. One official we interviewed indicated that “the bureau is now far better staffed and hence more capable of conducting enforcement actions. This has never happened before in our [bureau’s] history” (official B).<sup>7</sup> As a result, official A told us that “the amount of administrative fines collected from all types of violations in 2008 is higher than the total amount collected in the previous 30 years.” In addition, the empowerment of the EPB also led to additional agency efforts and actions to leverage social support to deal with polluting enterprises by encouraging and rewarding public exposure of polluting cases (officials A and B). The key difference is that “today we are able to back up the public’s environmental claims, but not polluting companies’ GDP contributions” (official C).

Finally, the “downward-delegated accountability” approach implemented during the campaign significantly reinforced the commitment of local officials and plant managers to reducing pollution. On the one hand, local political leaders have taken up more environmental responsibilities since the premier repeatedly emphasized the importance of achieving the ECER goals, which was a factor in cadre evaluations even during the economic crisis in 2008–09 (Heilmann and Melton 2013). On the other hand, similar environmental responsibility schemes were also extended to cover individual firms. Between 2006 and 2007, the Big Five power groups signed responsibility contracts with the SEPA, committing to close down small polluting power units and to reduce SO<sub>2</sub> emissions. In these contractual arrangements, the top executives of each targeted firm were liable for punishment should any subsidiary fail to meet the reduction targets. Official statistics show that these severely targeted power groups achieved an average 44.5 percent decrease in SO<sub>2</sub> emissions during the 11th FYP, considerably higher than the average 29 percent industrial decrease.

As suggested by the interviewees, the decentralized schemes made business executives incorporate a personal risk analysis into their calculations in balancing profit making and pollution control. For example, one environmental manager said, “sometimes the general manager focuses most of his attention on environmental issues rather than on routine business and production, which was

unimaginable in the past. Given such top management efforts, environmental protection has become an essential part of the plant’s operation” (firm 4). At firm 9, the vice president showed us the ECER contract hanging on the wall behind his desk, with his name printed on it. Another manager stated that the environmental responsibility agreement with the government had raised concerns of risk management in the firm’s general strategy—environmental compliance had become critically important to the firm’s survival and future development (firm 10).

### ***Understanding Interregional and Firm-Level Divergence***

The strength of campaign-style enforcement may vary across different regulatory contexts. In the four local jurisdictions we studied, Guangdong and Hebei set their ECER targets at a 15 percent reduction of SO<sub>2</sub> emissions

instead of the 10 percent national target. By 2010, it was reported that reductions of 18.88 percent and 17.34 percent had been achieved in these two areas, respectively. The other two provinces, Hunan and Hubei, set their ECER targets relatively lower than the national ones but were still able to meet their targets by the end of the 11th FYP.

These regional variations can be partly attributed to the triggering effect of critical events that opened a “window of opportunity” (Hoffman and Ocasio 2001; Ni and Ho 2008) to intensify campaign-style enforcement.<sup>8</sup> For example, Beijing and Guangzhou (the capital city of Guangdong) were the host cities of two major international sporting events—the Olympic Games in 2008 and the Asian Games in 2010, respectively. As it had been China’s political promise to stage a “Green Olympics,” the air quality in Beijing thus emerged as the primary concern of both the central and Beijing municipal governments at that time. Consequently, considerable financial aid for pollution control was first given to power plants in the neighboring region (Hebei) and later extended to others all over the country (Chen et al. 2013).

In our study, respondents from both local EPBs and power plants (firms 5, 6, 7, 8, 9, and 10) confirmed their observation of this triggering effect. For instance, to ensure the achievement of the air quality standards required for hosting the Asian Games, the Guangzhou EPB encouraged power plants to reduce their NO<sub>x</sub> (mono-nitrogen oxide) emissions, which was not required by the national pollution control regulations at that time (officials A, B, E). Attracted by a plethora of policy incentives from the local government, the two power plants that we studied in Guangzhou did indeed install denitrification equipment (firms 9 and 10).

We also found that the recoupling effect may have been constrained by individual firm features and managerial factors. For example, large power plants generally have greater productivity and higher pollution emissions than smaller ones, indicating an economies of scale effect in pollution control. A respondent working in one of the oldest power plants in China told us that because of its small generation capacity, the firm never received additional environmental funding from the local EPB (firm 5). Meanwhile, the top management’s green attitude may have reinforced the recoupling effect. In firm 9, it was the vice president who, with a strong environmental

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The strength of campaign-style enforcement may vary across different regulatory contexts.

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vision, convinced the corporate board to invest voluntarily in pollution control facilities:

We took voluntary actions to reduce SO<sub>2</sub> and NO<sub>x</sub> emissions due to two factors. The first is my belief in corporate social responsibility to seek a proper balance between environmental performance and gaining profit. Another factor is that most of our senior managers used to work in state-owned enterprises, thus they are aware of the importance of accommodating the regulatory and political demands for the firm's survival.

Meanwhile, managers' perceptions of a given environmental policy or program may also have influenced the recoupling effect. We found that managers usually make a greater effort to comply with regulations that they perceive as legitimate or "sensible." Only superficial effort will be devoted to "useless" programs. For instance, one environmental manager expressed her reservations with regard to the effectiveness of the ISO 14001 program (firm 3):

Some policy instruments may have a good original purpose in their design, but it is hard to say whether they can help a firm to achieve positive environmental outcomes in practice. My understanding is that effective tools include the "environmental impact assessment," the "three synchronizations," the adoption of strict pollution emissions standards, and the installation of online monitoring. Instruments like the ISO programs are almost useless in improving the firm's environmental performance.

## Discussion

Environmental regulations are difficult to enforce in both developed and developing economies, and both regulatory and organizational failures take place from time to time (Harrison and Antweiler 2003; Lubell 2004; Zhan, Lo, and Tang 2014). Although China is no exception, some noticeable success has been witnessed in pollution control in recent years. The implementation of the ECER policy that began in 2007, for instance, provides an interesting context in which to understand how failures in regular enforcement can be effectively remedied by campaign-style enforcement. This implementation process is characterized by the integration of political interventions, administrative reform, economic incentives, and cultural norms to improve environmental compliance within a short period of time. The recoupling model developed in this article provides a heuristic perspective to understand how resource mobilization and power redistribution together shape the effectiveness of this political implementation approach. These two complementary mechanisms are somehow segmented in the current literature without a systematic understanding of their effects on regulatory behaviors. By theorizing the recoupling model, this article helps further our understanding of the contingent nature of political implementation.

Most of the practices involved in resource mobilization and power redistribution mechanisms discussed here were tailor-made to serve the ECER campaign purpose. For instance, the green electricity program was an innovative practice launched in the state ECER guideline to combat SO<sub>2</sub> pollution. Some other practices were not new but were reintroduced during the campaign for efficacy reasons. For instance, the State Council reintroduced a plan to phase out small polluting coal-fired power units in 2008. This initiative was first

implemented during the 9th FYP but was put on the back burner in 2003–04 due to power supply shortages at that time. A similar situation can also be seen in the implementation of the downward-delegated accountability approach. One notable exception is the upgrade of the SEPA to the MEP, which was not customized for serving the ECER campaign purpose but played an important role in facilitating local environmental enforcement and corporate compliance in the ECER campaign, as presented in our findings earlier.

The two recoupling mechanisms first addressed the decoupling problem of lax enforcement in environmental governance, with a particularly significant impact of power redistribution. Intensive efforts in power redistribution relieved the problem of "fragmented authoritarianism" (that is, weak enforcement power of environmental agencies caused by the dual command authority structure), a major obstacle to the effective implementation of environmental policy in China (Lieberthal and Oksenberg 1988; Marquis, Zhang, and Zhou 2011). Strong political support helped mobilize resources from various administrative agencies in a more coordinated and concerted manner. Establishment of the superministerial leading team helped to solve the chronic problem of poor interagency collaboration, which was largely responsible for the failure of previous environmental campaigns. In addition, environmental responsibility was effectively passed from top to bottom along the administrative hierarchy, as corresponding interagency collaborative arrangements were also established at the provincial, municipal, and even county levels. Such strong political and administrative forces had been virtually nonexistent in many of the previous campaigns. For example, the 10-year Cleaning Up the Huai River Campaign failed partly because the four provincial governments involved had an administrative rank higher than that of the SEPA (Li and Foster 2008). Therefore, it was difficult for the SEPA, as a leading agency of the campaign, to command the necessary respect from local governments and regulated entities for effective implementation.

The two complementary mechanisms also addressed environmental decoupling in individual regulated firms, both pragmatically and ideologically. The resource mobilization mechanism, featuring a combination of the carrot (incentives) and stick (punitive measures) approaches, enhanced organizational efficiency while largely deterring symbolic compliance. We also found that power redistribution within the governance structure enhanced regulatees' perception of environmental legitimacy and made them take action to achieve the policy targets. This further underlines the importance of government signaling as an important mechanism of political influence (Marquis and Qian 2013). In addition, a clearly reorganized hierarchy of authority also alleviated the policy conflicts that firms face when multiple political and administrative forces are in place.

In spite of its recoupling momentum, campaign-style enforcement may also cause side effects. For instance, abrupt interventions may be overly cumbersome for regulatees to invest in within a short period of time instead of making improvements in an efficient way (Zhao and Ortolano 2010). In the case of the ECER campaign, local governments that were laggards even took last-minute actions of temporarily interrupting power generation to meet their momentary targets (Wang 2013). Possible long-term side effects may also appear, especially when there is overuse of interim practices that are not routinized as administrative implementation measures.

Campaign-style enforcement that is shaded with political leaders' interest in achieving their political goals may reinforce the lack of a rule of law tradition. In this regard, the alteration of political leaders, the change of political calculation, and the unsustainability of resource input may make the recoupling effect short-lived and even contorted (Wang 2013). For example, although triggering events such as the goal of a Green Olympics could strengthen the recoupling process in the short term, its positive effect may fade away because it was, to some extent, a short-term (or an ad hoc) political commitment to build a green image of China.<sup>10</sup> In addition, a possible negative impact on administrative capacity-building and policy-making quality may stem from the biased priority setting in campaign-style enforcement.<sup>11</sup> Because campaigns are usually driven by a need to cope with urgent situations rather than a need to figure out a systematic solution, only a handful of highly selected policy indicators are addressed and will receive most implementation attention, while other policy goals may be systematically out of focus. In our study, we observed that NO<sub>x</sub> and PM (particulate matter) 2.5 air pollution were not targeted in the ECER campaign but have since become new (and even more challenging) environmental problems to deal with in the 12th FYP. Other examples can also be seen in food security and antiterrorism in the Chinese context.

Notwithstanding the possible side effects, campaign-style enforcement did address the most pressing policy issues effectively and efficiently. Its long-term legacy in accelerating the pace of political and legal evolution toward environmental protection can also be expected if effective campaign practices can be sustained while misconducts are discarded. In China, institutional improvement is usually based on cumulative campaign efforts over time (Biddulph, Cooney, and Zhu 2012; Van Rooij 2006). In the case of the ECER campaign, many effective practices have been institutionalized as routine administrative measures to improve policy implementation during the 12th FYP. For example, the ECER Guideline of the 11th FYP was updated and continuously enforced in the 12th FYP. Unlike superministerial teams that are set up only for temporary purposes, the ECER leading team was routinized as the Advisory and Coordinating Organs under the State Council. The team has been holding annual meetings since its establishment in 2007 and has continued its operation in the 12th FYP, with Li Keqiang, the new premier of China, in charge and one vice premier serving as the deputy director. In the power sector, the amended desulfurization facilities operation and price premium in 2014 provided improved financial schemes and mandated continuous enforcement efforts to further reduce SO<sub>2</sub> emissions and combat NO<sub>x</sub> pollution. Other notable reforms in air pollution control regulations and emission standards (e.g., the 12th Five-Year Plan on air pollution prevention and control in key regions) in the past few years are also considered to have been drawn from prior campaign experiences.

Effective campaign-style enforcement may also raise the general public's environmental awareness and increase their engagement in environmental protection. Though public engagement is beyond our empirical investigation, it is widely considered a key component of the campaign-style enforcement of the ECER policy (particularly

on energy conservation). People who have experienced considerable environmental improvements in a short period will likely be motivated to work for better environmental quality in the future. Examples can be seen in the trend of advocacy campaigns for pollution control conducted by environmental nongovernmental organization (Zhan and Tang 2013) and antidevelopment environmental movements initiated by affected citizens (Johnson 2010), as well as recent concerns raised among Chinese citizens nationwide regarding the PM 2.5 air quality rating. These lasting effects of campaign-style enforcement appear to be long term and deserve further investigation.

## Conclusions

How to ensure compliance with government laws and regulations has been a central theme in the literature on policy implementation. However, very few studies have examined the mechanisms through which campaign-style enforcement helps achieve policy targets. This research contributes to the literature on policy implementation by exploring the recoupling process and effects of campaign-style enforcement within an authoritarian context. The recoupling model we have developed helps explain how campaign-style enforcement works and why some prior environmental campaigns failed.

Conditions for the success of campaign-style enforcement lie primarily in a combination of resource mobilization and power redistribution to effectively address decoupling problems in both corporate compliance and local enforcement. In addition, with the presence of a politically powerful steering team to direct the campaign effort, interagency collaboration in campaign-style enforcement may achieve more effective regulatory outcomes than an enforcement campaign led by a single agency with relatively weak bureaucratic authority (e.g., the SEPA in previous campaigns).

A broader implication for regulatory policy implementation is that policy makers should understand the signals that sporadic political interventions are sending to regulatees and local officials and their possible limitations. Although the recoupling effect of campaign-style enforcement can be effective in the short term, how to leverage the lessons learned from previous success for future policy making and implementation requires further effort, both regulatory and organizational.

This research suggests several avenues for future work. First, our study focuses on one sector in China, in which state-owned enterprises constitute the majority and are largely sensitive to political demands. Future research may take a further step to explore the effectiveness of campaign-style enforcement across different industrial sectors and ownership types. This line of research could also be extended into other policy areas such as crisis management, anticorruption, and so on. Second, because our research focuses on a relatively short period with radical changes, the results are limited in explaining whether the recoupling process would evolve over time. On the one hand, the arbitrary power of campaign-style enforcement is usually based on the routine power of regular enforcement and hence may facilitate changes in the latter. On the other hand, decoupling itself may also trigger internal changes that lead to an ultimate erosion of decoupling at the firm level (Tilcsik

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2010). Future research could adopt a longitudinal method to specify more precisely the interplay between campaign-style enforcement and routine enforcement, as well as the interaction between external recoupling forces and internal adaptations.

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## Notes

1. Statistical information on environmental pollution in this article is taken from national and local environmental databases.
2. Because of the involvement of political power, campaign-style enforcement is somehow similar to political campaigns that prevailed during the Maoist era (which are usually considered pure political actions), yet campaign-style enforcement serves policy goals rather than political goals.
3. The literature remains inconsistent on whether the adoption of voluntary environmental program improves corporate environmental performance. The positive effect was confirmed by Potoski and Prakash (2005) in a U.S.-based study; by Darnall and Kim (2012) in an Organisation for Economic Co-operation and Development survey; and by Fryxell, Lo, and Chung (2004) in Chinese firms (modest impact). Some other researchers found that such an impact could be negative or insignificant (Antweiler and Harrison 2007; Darnall and Sides 2008). Future research should further explore the contingencies associated with the compliance strategies in adoption of voluntary environmental programs.
4. The full name of the team is the National Leading Group to Address Climate Change and Energy Conservation and Pollutant Discharge Reduction. This article focuses on its role in leading energy conservation and emission reduction.
5. The implementation of the ECER policy in the coal-fired power industry nevertheless targeted all types of ownership.
6. By now, there are more than 30 superministerial leading teams in the State Council, with those headed by the premier usually having a higher level of member configurations.
7. One may be concerned that the enlargement of local environmental bureaus is unique to Guangdong because of its environmental proactivity. In fact, similar changes have been witnessed nationwide. For example, the average staff increase at city-level EPBs between 2008 and 2010 doubled that between 2001 and 2007.
8. Eleven out of the 31 provincial jurisdictions set their ECER targets notably higher than the national targets and successfully achieved their goals. Such regional differences might also be attributable to other factors, such as local economic development, industrial structure, and prior environmental quality. Because of the sampling limits, we do not discuss these variations here.
9. This regulation mandates that pollution control facilities and new factories (or existing factories that expand or change production processes) should be designed, constructed, and operated in a synchronized manner.
10. Some post hoc studies found that 60 percent of the improvement in air pollution during the event was not sustained one year later because of resource constraints (Chen et al. 2013).
11. We want to thank an anonymous reviewer for suggesting that we consider this issue.

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