China in Transnational Extractives Governance: A Mapping Exercise

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Abstract

China became one of the biggest players in the global extractive resource supply chain, along with increasing extractive resource demand for green industries. Interestingly, over the last two decades, Chinese actors started participating in transnational extractive governance initiatives (TEGI) supporting transparency, a norm for governance-by-disclosure. This article aims to answer the question of what types of Chinese actors engage in what TEGIs regarding transparency. Based on mapping forty-eight TEGIs, this article shows a nuanced pattern of China's involvement in extractives governance beyond a dualistic approach to China in global governance—whether China is a threat or nonthreat. Importantly, China does not act as a unified monolithic actor; rather, different types of actors engage TEGIs distinctively. Chinese corporations are most actively engaging in thin transparency TEGIs lacking stringent verification rules and featuring limited multistakeholder participation. It could potentially accelerate the risk of green washing of those companies and disempower weaker actors.

The sustainability of the global extractive resource supply chain has become a significant issue in global environmental governance. This issue is exacerbated by the growing international demand for mineral resources that are critical to green industries, such as cobalt, which is used to produce lithium-ion batteries in solar panels and electric vehicles. China has become one of the biggest players in the global market for extractive sources over the last few decades—today, China controls almost 60 percent of the global lithium supply chain (*Foreign Policy* 2019, 5) and runs more than 70 percent of copper and cobalt mines in the Democratic Republic of Congo (DRC) (Prasso 2022). Moreover, the Xi regime's national grand strategy, the Belt and Road Initiative (BRI), has expanded China's influence in the global extractive sector (Organisation for Economic Co-operation and Development 2018, 24) by supporting Chinese companies seeking to develop infrastructure and operate large-scale mining projects in resource-rich countries. Despite their rapidly growing impacts on the extractive sector, previous studies in global governance have not sufficiently investigated Chinese actors' roles in governing the issue.

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Since the early 2000s, the international community has established several transnational extractive governance initiatives (TEGI), such as the Extractive Industries Transparency Initiative (EITI) (see Auld et al. 2018), which provide guidelines meant to enhance the transparency of governments and mining companies and make extractive projects more sustainable. The basic idea behind TEGIs is that enhanced transparency in the global extractive resource supply chain can mitigate negative social and environmental impacts, such as the resource curse that plagues many resource-rich countries (Alstine 2014; David-Barrett and Okamura 2016; Humphreys et al. 2007). For example, disclosing financial transactions between resource suppliers and buyers through TEGIs' transparency policies might curb corruption in those developing countries where resource extraction results in conflict and poverty (Weinthal and Luong 2006). In this way, TEGIs function as platforms for the development of international transparency norms and work as global norm entrepreneurs. On the other hand, we cannot understand the actual effects of TEGIs without reviewing China's involvement in TEGIs. If China, one of the world's biggest players in resource extraction, does not participate in transnational governance mechanisms advocating transparency norms, then TEGIs cannot effectively achieve their intended policy goals. Thus, this article explores China's engagement in TEGIs and its impact on the development of global transparency norms.

The so-called China threat debate in today's academic and policy discussions provides skeptical views on China's role in global governance. This perspective asserts that China is challenging the existing norms of "good governance"—for example, transparency, human rights, environmental rights, and democracy—advocated by traditionally powerful governance actors, such as the World Bank, the United States, and the European Union (Kopinski and Sun 2014). Some scholars have shown different characteristics of Chinese versions of global governance and highlighted how Chinese investment and business operations in resource-rich developing countries focus on so-called effective governance rather than upholding values; that is, these actors focus on the profitability of their operations (e.g., Mol 2011; Power et al. 2012; Zhang 2011). On the other hand, diverse types of Chinese actors have recently begun to participate in some TEGIs developing global transparency standards. It is noteworthy that most TEGIs are "good governance" initiatives advocating global transparency norms (Alstine et al. 2014), and China has become a part of the governance architecture. For example, Chinese government agencies and companies participated in the seventh EITI Global Conference (Cordy 2016). Furthermore, the International Council on Mining and Minerals (ICMM) and the Chinese Chamber of Commerce of Metals, Minerals, and Chemical Importers and Exporters (CCCMC) agreed, in December 2017, to promote sustainable development in Chinese overseas mining investments (International Council on Mining and Minerals 2017). Increasing Chinese involvement in such TEGIs raises the question of whether Chinese actors accept or challenge the transparency norms forwarded or supported by these governance initiatives, based on their unique values and growing international power.

Whereas some studies have examined the environmental and social impacts of Chinese investment and extractive projects overseas at the local level (González-Vicente 2013; Mol 2011), there is a lack of studies examining the role of China in the existing global extractives governance architecture. This gap exists in part because most previous studies of TEGIs employed a single case study approach. With few exceptions (e.g., Auld et al. 2018), a lack of academic research shows a comprehensive topology of the current transnational extractives governance. Furthermore, there have been no attempts to explain different types of Chinese actors' roles in developing global norms in the governance realm. Many previous studies, especially in international relations (IR), analyze China as a unified, monolithic actor so that they often provide a simplified view of whether China is a threat or a nonthreat. This study fills these gaps in the literature by conducting a mapping exercise and attempting to chart the general tendencies of Chinese actors' involvement in TEGIs where transparency norms are developed and translated into global public policies. It seeks to examine, first, which TEGIs produce and reproduce what type of transparency norms projected onto their policies; second, which Chinese actors are involved in which TEGIs; third, how these actors engage in TEGIs that emphasize transparency norms; and fourth, the distinct conditions under which Chinese actors engage in TEGIs.

The article is organized as follows. The second section provides a brief overview of transnational extractives governance, especially vis-à-vis transparency. The third section describes the current debates about China as an emerging power in transnational extractives governance. The fourth section shows the results of the study's empirical analysis of forty-eight TEGI governance platforms aimed at improving the social and environmental responsibility of the extractive sector. This section reveals different types of transparency norms within TEGIs and patterns of Chinese actors' participation in TEGIs. The last section discusses the implications of China's normative role in global extractives governance.

Transnational Extractives Governance and Transparency

Transnational extractives governance is a relatively recent phenomenon compared to other global environmental governance areas (Auld et al. 2018). Growing international demand to solve diverse issues in the global extractive resources supply chain—including corruption, the use of child labor, and water pollution at mining sites—has led to the establishment of several TEGIs in the past two decades. TEGIs function as governance platforms, developing new global policies and norms. They help stakeholders come together to develop new global policies and norms and identify common principles or voluntary standards regarding the environmental and social elements of resource extractive projects. TEGIs like EITI grew out of a sense that top-down regulations within a country's jurisdictional territory could not effectively govern various actors in the global supply chain (Haufler 2010a, 2010b). For similar reasons, many previous studies emphasize the increasing demand for transnational multistakeholder networks and have provided an abundance of theoretical terminology within the field of global environmental politics, such as global private governance (Cashore 2002; Pattberg 2005), transnational multistakeholder governance (Pattberg and Widerberg 2016), and transnational public–private governance (Andonova et al. 2009; Bäckstrand 2006).

Despite the theoretical richness of these global environmental politics perspectives, the literature lacks research that sees the TEGI as an independent realm of global governance—one distinct from other environmental concerns, such as climate change (Auld et al. 2018; exceptions include Acosta 2013; Carbonnier et al. 2011). Previous studies of TEGIs usually focus on a specific extractive sector, such as gold (Auld et al. 2018; Bloomfield 2017) or diamonds (Haufler 2010b), or they look at a single initiative as a case study. Of the latter group, most studies focus on the EITI. These studies often examine the institutional traits of the EITI in the context of the implementation of policy, the compliance of EITI members (David-Barrett and Okamura 2016; Ihugba 2016), or the local impacts of the EITI (Öge 2016; Papyrakis et al. 2017; Sovacool and Andrews 2015). In short, there is no comprehensive picture of existing TEGIs that creates globally shared norms for resource governance.

Most global governance scholars recognize norms as critical components of transnational governance systems (Bernstein and Cashore 2007). Transparency has been a principal norm in transnational extractives governance, initially advanced as a core norm to combat corruption linked to resource extraction projects by disclosing the information of financial transactions between extractive companies and governments (Alstine 2014). EITI has taken a leading role in consolidating transparency as a global norm in transnational extractive governance (Rustad et al. 2017) since it was created in 2002, after the Publish What You Pay campaign. The basic idea supporting the transparency norm in resource governance is that the public disclosure of information of powerful actors can make them accountable because other actors, particularly civil society actors, become accessible to the information and monitor them more easily (Haufler 2010a). In this sense, transparency could empower weaker agents by fixing a problem of information asymmetry among powerful and less powerful actors (Florini 2007).

On the other hand, even though most TEGIs commonly highlight transparency as a principal norm (Alstine 2014; David-Barrett and Okamura 2016), there has been no unified understanding or application of transparency among TEGIs. TEGIs appear to support transparency norms centered on different extraction-related issues, for instance, corruption, violent conflicts linked to mineral extraction (e.g., Kimberley Process), or sustainability (ICMM) (see Fonseca 2010; Sethi and Emelianova 2006). Notably, each TEGI's target of transparency has been diversified. More recently, EITI started emphasizing the necessity of disclosing members' environmental and ecological impacts (Ponsford et al. 2018). It seems to be a meaningful shift to govern transnational environmental challenges caused by resource extractions, because transparency centered on environmental aspects have been relatively marginalized in transnational extractive governance. Bleischwitz (2014) also argues that transparency norms in resource extraction need to be broadened to include environmental concerns. Despite this complex picture of transparency norms in transnational extractives governance, most of the existing literature does not reflect the full variety of transparency norms operated in TEGIs because of its heavy focus on the EITI as a single case study. Thus, by drawing a comprehensive map of different types of TEGI transparency norms, particularly examining transparency norms intersected with environmental concerns, this article makes a substantial contribution to the previous literature in the field of global environmental politics.

The Rise of China in the Extractive Sector

The rise of China has been one of the most hotly debated issues in IR scholarship in recent decades. For instance, some scholars have tried to discern whether an emergent China will attempt to challenge American hegemony and reshape norms and values in the existing world order (Brooks and Wohlforth 2016; Mearsheimer 2010). Particularly, the Belt and Road Initiative has been viewed as a symbol of China's emerging power over traditional great powers. The BRI is China's intercontinental investment program targeting infrastructure development and close economic cooperation with countries mostly in the Global South, and currently, 147 countries participate as partners.[1] The BRI's massive infrastructure projects have greatly expanded China's influence in the developing world (*Economist* 2018). Particularly, extractive sectors became a major focus in China's BRI investment due to China's domestic shortages of natural resources (Gallagher 2016, 2019). For instance, Chinese companies operate or finance fifteen of nineteen cobalt mines in the DRC, one of the BRI countries (Searcey et al. 2021). In this light, the BRI has been a useful platform for Chinese extraction companies to access mining sites around the world.

Meanwhile, many studies have emphasized potentially growing negative impacts of China's dominant influence. First, one of the major concerns is that China could "weaponize" mineral resources against foreign countries for political purposes, similar to a past event—China's military blockage of rare-earth mineral exports to Japan in 2010 (Klinger 2018). Second, increasing research and public media examine negative environmental and social impacts of China's BRI investment and growing resource extractions in resource-rich

1. https://greenfdc.org/countries-of-the-belt-and-road-initiative-bri/, last accessed January 13, 2023.

developing countries. Some previous studies have emphasized the negative impacts of China's increased investment on the environment and recipient countries (Chin 2012; Zhang 2011). For example, Kopinski and Sun (2014) explained that Chinese investment is based on project-type financing, which emphasizes profitability and is therefore distinct from the World Bank's program-type financing, which considers a project's potential environmental and social impacts as a rule. Hughes (2019) specifically argues that the BRI could lead to serious threats to biodiversity in China's BRI partner countries.

The China threat narrative often highlights Chinese actors' different behavioral patterns and explains them with reference to Chinese values and norms. Several scholars have explained how Chinese government actors and companies violate transparency norms in resource-rich developing countries. For instance, Harvey's (2014) work links Chinese investment in Africa to the low level of African development via the opaque relationship between Chinese national banks and government elites (see also Power et al. 2012). Bond and Garcia (2015) advance a similar argument that China intensifies the unfair relationship between local people and local elites through tax evasion or mispriced minerals. Furthermore, Tuman and Shirali (2017) suggested that Chinese business culture, especially social networks and guanxi,[2] can help explain the preference of Chinese firms in African countries for informal avenues as opposed to legal channels. A recent *New York Times* series on China's critical mineral extractions in the DRC showed similar transparency problems. According to the report, some Chinese mining companies bribed employees into secrecy to cover workers' injury tallies (Searcey et al. 2021). Moreover, in February 2022, a local court at Lubumbashi ruled to suspend China Molybdenum's mining activities because the company did not declare copper and cobalt reserves and royalties to the DRC government (Lipton and Searcey 2022). To mitigate China's negative effects in the global extractive supply chain, some scholars claim that China should more actively participate in TEGIs supporting transparency norms, such as EITI, and enhanced environmental reporting (Klinger 2018; Preston et al. 2016). However, there is a distinct lack of studies observing China's involvement in the global extractives governance process of creating and disseminating transparency norms at the transnational level. Indeed, the role of actors from the Global South has been overlooked in global governance studies in general (Hale and Held 2011), and only a few studies in the global extractives governance literature have focused on China. For instance, Mouan (2010) exceptionally describes how Western actors' principles and values hinder China's active participation in the EITI. Furthermore, Auld et al. (2018) pointed out the significance of examining the increasing influence of emerging economies in

2. Even though these authors do not directly mention guanxi, their argument explicitly describes how Chinese business culture and social norms influence Chinese behavior in African countries. Guanxi is a unique Chinese cultural element of business relationships, emphasizing interpersonal rather than official connections.

transnational extractives governance, such as China and India, given that their growth and emergence might cause new governance challenges. For these reasons, this article aims to reveal Chinese actors' involvement in the existing extractives governance architecture pertaining to transparency as a principal norm in the governance realm.

Research Method and Data

This research is based on an analysis of forty-eight cases of TEGIs that were active as of 2020. The forty-eight TEGIs are listed in Table 1. Cases were identified by drawing on the International Trade Centre Standards Map and several lists from the scholarly literature (Auld et al. 2018; Bauchowitz 2014). I selected the initiatives that govern extractive sectors (mining oil, gas, metals, and minerals) through "steering, rule-making, implementation, or enforcement" based on "transnational" interactions among public and private actors by following the criteria used in Auld et al. (2018, 433). To focus on examining global governance dynamics related to the extractive sectors, I excluded regional and local governance initiatives.

These lists were then cross-checked with the list of voluntary responsible mining initiatives in the 2015 white paper of the World Economic Forum and RESOLVE. The main data source was written documents—including meeting minutes, annual reports, governance guidelines, and member lists—published by each TEGI and made accessible on their official websites. Analysis of these documents was supplemented with three expert interviews: one with a senior staff member of an international nongovernmental organization, one with a director of a Chinese government agency, and one with a Chinese scholar who specializes in this topic as a target group. The expert interviews provided crucial background knowledge that helped the author to interpret the coding results and increase the credibility of the data analysis.[3] Additionally, I cross-checked the interview contents with accessible academic and policy literature for credibility.

The TEGI data were analyzed through a two-tier coding cycle (cf. Saldaña 2016) and by applying abductive analysis, which pursues "a finding of surprise, puzzle, or anomaly" (Timmermans and Tavory 2012, 180). Abductive analysis is an ongoing reasoning process that repeats cycles between analysis and data gathering (Timmermans and Tavory 2012, 175) so that a researcher can determine which anomalous cases should be highlighted. TEGI data were compiled and coded in Microsoft Excel in terms of the TEGI's approach to the issue of transparency, the types of actors involved (e.g., companies, banks, government agencies), and the nature of Chinese actors' participation. This analysis aims to show the primary characteristics of the transparency of current TEGIs and reveal

3. The interviewees' anonymity has been assured and protected for privacy reasons.

Table 1
The Forty-Eight TEGI Analyzed in the Study

TEGI	*Acronym*
Africa Mining Vision	AMV
Alliance for Responsible Mining	ARM
Alliance for Responsible Mining Fairmined Initiative	FI
Aluminum Stewardship Initiative	ASI
Better Gold Initiative	BGI
Devonshire Initiate	DI
Diamond Development Initiative International	DDI
Dow Jones Sustainability Index	DJSI
Dubai Multi Commodities Centre	DMCC
Equator Principles	EP
Equitable Origin	EO
European Partnership and Responsible Minerals	EPRM
Extractive Industries Transparency Initiative	EITI
FTSE Russell	FTSE
Global e-Sustainability Initiative	GeSI
Global Reporting Initiative	GRI
Initiative for Responsible Mining Assurance	IRMA
Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development	IGF
International Council on Mining and Metals	ICMM
International Cyanide Management Code	ICMC
International Finance Corporation	IFC
International Petroleum Industry Environmental Conservation Association Oil and Gas Industry Guidance on Voluntary Sustainable Reporting	IPIECA
International Seabed Authority Mining Code	ISA
International Tin Research Institute Tin Supply Chain Initiative	ITRI
ISO14001 Standard for Environmental Management Systems	ISO
Kellogg Innovation Network	KIN
Kimberley Process	KP
London Bullion Market Association's Program	LBMA
Mining Association of Canada–Towards Sustainable Mining	TSM

Table 1
(Continued)

TEGI	*Acronym*
The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises	OECD
Prospectors and Developers Association of Canada e3 plus	PDAC
RESOLVE Deep Seabed Mining Projects	DSM
Public-Private Alliance for Responsible Minerals Trade	PARMT
Responsible Artisanal Gold Solutions Forum	RAGS
Responsible Business Alliance	RBA
Responsible Cobalt Initiative	RCI
Responsible Jewelry Council	RJC
Responsible Minerals Initiative	RMI
Responsible Mining Foundation	RMF
Responsible Steel TM	RSTM
Social Accountability 8000 Standard	SA8000
Solutions for Hope Tantalum Project	SHTP
The International Tin Association Code of Conduct	ITS
The International Union for Conservation of Nature Global Business and Biodiversity Programme	GBBP
United Nations Global Compact	UNGC
Voluntary Principles on Security and Human Rights	VPSHR
World Economic Forum Responsible Mineral Development Initiative	RMDI
World Gold Council	WGC

various patterns in Chinese actors' involvement in the transnational extractive governance architecture. I assume that Chinese actors' active engagement in certain TEGIs reflects their adoption of primary norms projected onto the TEGIs' policies.

Transparency in TEGI

This research confirms that transparency is a primary norm of TEGIs. The disclosure of information via audits or reporting is a common policy tool for improving accountability in all forty-eight TEGIs analyzed in this study.

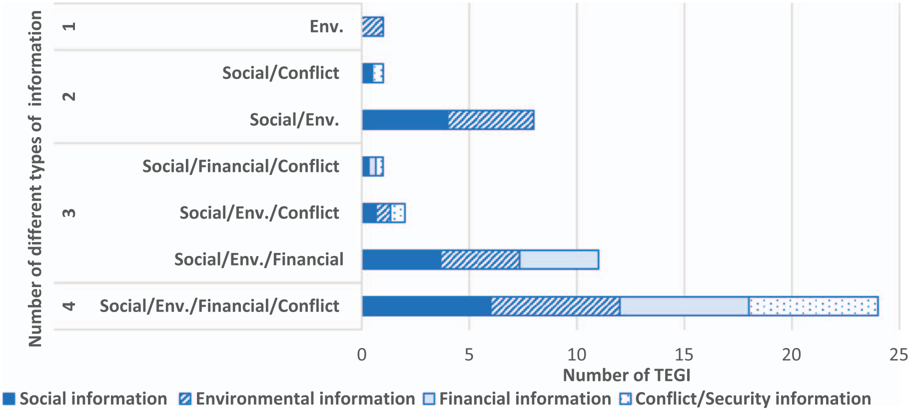

Figure 1
Different Transparency-Related Issues Among the Forty-Eight TEGIs Analyzed in the Study

Figure 1 displays the types of information members of these initiatives are required to disclose. Figure 1 also shows how TEGIs have expanded the scope of information they require and thus broadened the meaning of transparency beyond focusing on the disclosure of financial information in the extractives sector. Forty-seven of the forty-eight TEGIs asked companies to report on social issues, such as human rights, labor rights, and public health, and forty-six demanded that companies disclose information on their operations' environmental effects. Furthermore, half of the forty-eight initiatives ask participants to report on all four different types of information, while only ten initiatives focus on one or two types of transparency-related issues.

This analysis also reveals an important distinction between the thick and thin versions of the transparency projected by TEGIs. Schleifer et al. (2019) distinguish between shallow and deep transparency, and Bloomfield (2017) distinguishes between first-, second-, and third-party governance initiatives. These scholars' categories imply that there are degrees of transparency in decision-making procedures and that substantial policy outcomes are decided in part by "what information is disclosed by whom, and for whom" (Schleifer et al. 2019, 4). In short, these scholars suggest that if transparency standards are created and implemented by industrial actors alone, and compliance and verifying mechanisms are not developed and enforced by outside parties, transnational governance systems would lack legitimacy and accountability.

This article distinguishes between thick and thin transparency initiatives based on the findings of the studies mentioned earlier. It defines a thick transparent initiative as one possessing a more accountable governance mechanism and a thin transparent initiative as one lacking verifying systems—particularly those that share only a limited amount of information with the public. Applying the evaluation criteria of previous literature, the forty-eight TEGIs in this study were coded as promoting thick transparency if they met all of the following criteria (similar to deep transparency and third-party governance initiatives in Bloomfield 2017; Schleifer et al. 2019): first, they disclose information about multistakeholder rule-setting processes to the public; second, an independent third party is present in the monitoring process; and third, they disclose a substantial amount of information about their monitoring results to the public.

The coding results show that most initiatives project thin transparency through their governance mechanisms. Only eleven of the forty-eight initiatives (approximately 23%) satisfy all three thick transparency criteria (Figure 2); twenty-seven (more than 50%) met only one condition or none, and ten fulfilled two criteria. The prominence of thin transparency in these TEGIs indicates that the public has limited access to information about companies' behaviors in the extractive sector. This could in turn foster doubt regarding the credibility and efficacy of TEGIs.

Chinese Engagement in TEGI

A considerable number of Chinese actors engage with TEGIs. Chinese companies, government agencies, banks, academics, and civil society actors participate in twenty-nine of the forty-eight TEGIs examined in this study. The growing presence of Chinese actors in TEGIs indicates that China is not rejecting global transparency norms; instead, it is becoming an active player by adopting the transparency standards of transnational extractive governance mechanisms. Of these twenty-nine TEGIs featuring Chinese participants, twenty-one advanced thin transparency.

Transnational governance scholars differentiate between public, private, and hybrid initiatives based on the types of actors involved (Abbot and Snidal 2009). Figure 3 shows how Chinese actors tend to take part in more private initiatives than other types of TEGIs, that is, those regulated by companies

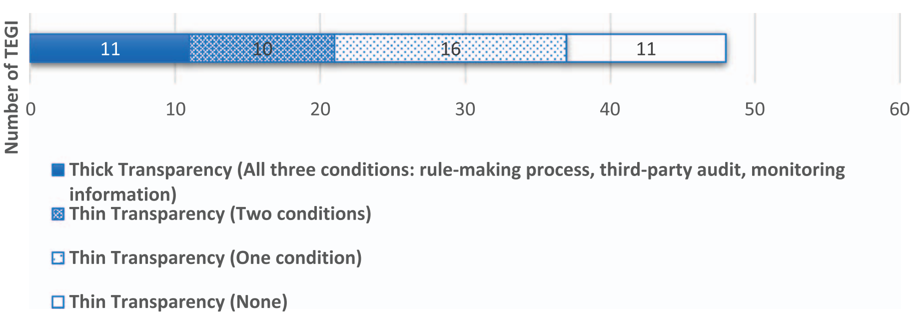

Figure 2
Thick and Thin Transparency TEGIs

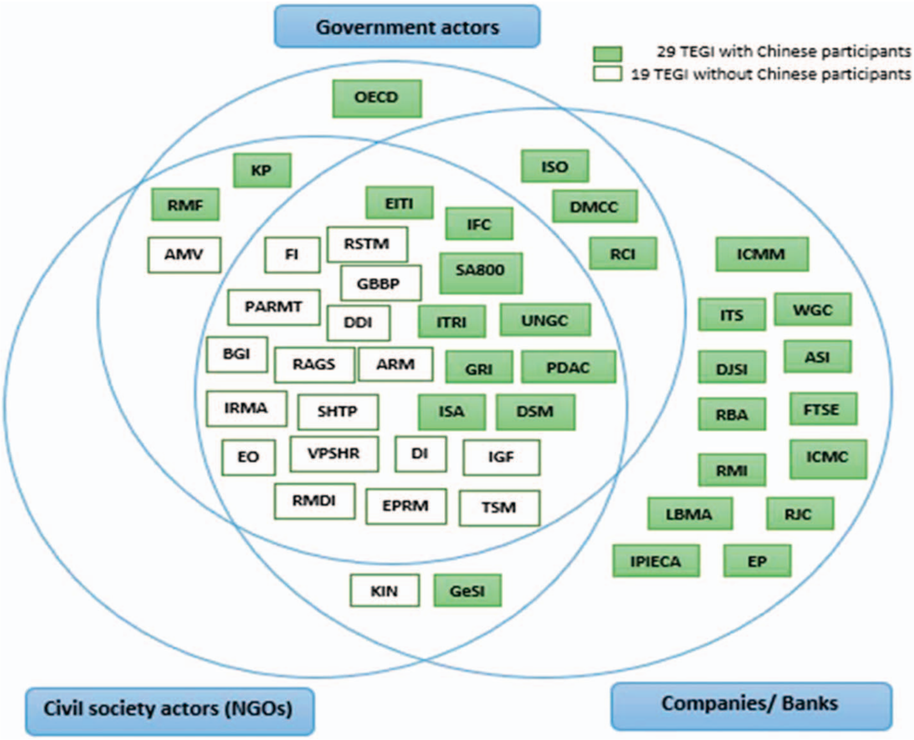

Figure 3
Mapping the Forty-Eight TEGIs by Their Main Participants, Including Chinese Participants

or banks (thirteen of the twenty-nine TEGIs with Chinese participants). This concentration is notable because the majority (twenty-six) of the forty-eight TEGIs analyzed in this study are hybrid; that is, they are led by all three types of actors (government agencies, companies, and nongovernmental organizations [NGOs]). By mapping Chinese involvement in these forty-eight TEGIs, we can see that Chinese actors seem to prefer private governance arrangements (corporation-centric mechanisms) over hybrid schemes jointly operated by companies, governments, and NGOs. Abbot and Snidal (2009) claim that such private initiatives are instances of firms' self-regulation and do not necessarily lead them to act in the public interest because of the absence of states and NGOs playing an essential role in monitoring and enforcement processes. From this perspective, China's preference for private initiatives could create accountability issues in global extractives governance generally.

It is worth acknowledging that China does not participate in TEGIs as a unified, monolithic actor to figure out major Chinese actors in the global extractives governance realm. Figure 4 demonstrates different Chinese actors' participation in TEGIs. The graph identifies the total number of TEGIs open to

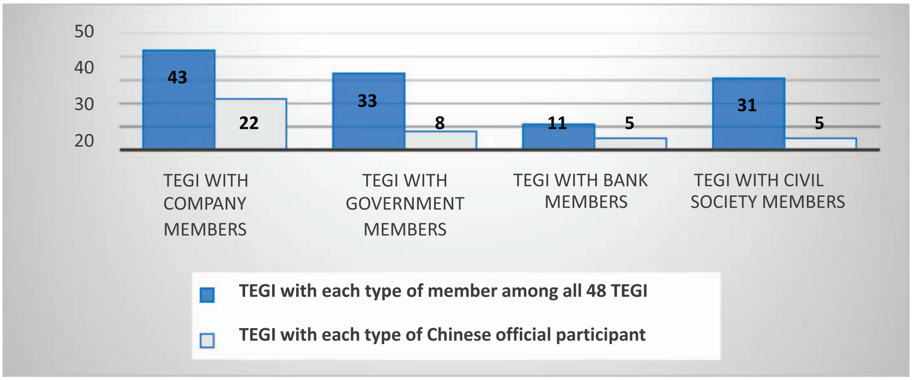

Figure 4
Types of Chinese Actors Participating in TEGIs

different kinds of actors; that is, the circle on the right indicates private TEGIs with business participants, and the center in the three bubbles represents hybrid initiatives consisting of all three types of participants. Figure 4 also shows the number of participants with direct Chinese participants—not all forty-eight TEGIs are open to all types of actors. For instance, Chinese companies are part of twenty-two of the forty-three TEGIs available to them, and Chinese banks participate in about 45 percent of the eleven TEGIs available to them. The participation rates of Chinese companies and banks are distinctly higher than those of Chinese government agencies (eight of thirty-three available TEGIs) and civil society actors (five of thirty-one available TEGIs). In other words, Chinese market actors are more active participants in the current TEGI architecture than their government or civil society counterparts. In what follows, this study details how Chinese companies and government agencies show distinctive engagement patterns.

Chinese Companies

Chinese companies are the most prominent type of Chinese participants in TEGIs. As of 2020, approximately 208 Chinese companies had joined 24 TEGIs. These companies included China's largest extractive companies—both state-owned companies, such as the China Minmetals Corporation (participating in five TEGIs: ISO, UNGC, ITS, ISA, and DSM) and China National Gold Corporation (UNGC and ICMC), and private companies, such as the Zijin Mining Group (DJSI and LBMA) and China Molybdenum (RMI and DJSI). Figure 5 shows that most Chinese companies are active participants in TEGIs; that is, they accept a formal obligation to comply with transparency requirements and can participate in decision-making processes related to transparency norm development within the initiative itself. The active participation of

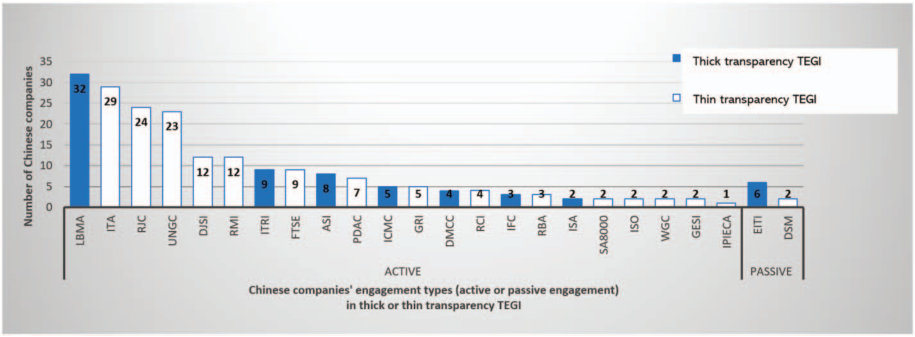

Figure 5
Numbers of Chinese Companies Participating in TEGIs and Their Engagement Types

China's largest private- and state-owned extractive companies is remarkable given their growing influence overseas. Other companies involved in these TEGIs include the electronics giants Huawei and ZTE. This latter group tends to be sensitive to the reputations of their brands, given the demands of global consumers and foreign NGOs (Drezner and Lu 2009, 188). To improve their market image, these companies put pressure on their upstream resource suppliers to follow corporate social responsibility standards of TEGI-like codes of conduct, including transparency measures.[4]

Another major characteristic of Chinese companies' participation in TEGI is that most companies are engaging with initiatives that advance thin transparency. Figure 5 shows that Chinese companies actively participated in fifteen thin transparency TEGIs and only seven thick transparency TEGIs. Overall, approximately 70 percent of the 208 Chinese companies mentioned above are involved in thin transparency TEGIs. As mentioned above, these types of initiatives usually lack governance mechanisms that make them accountable to the public, and thus raise concerns that TEGIs serve the interests of powerful companies by enhancing their reputation and not guaranteeing their actual compliance with environmental regulations (Dingwerth and Eichinger 2014, 243). Indeed, Drezner and Lu (2009) suggested that Chinese companies lean toward voluntary CSR programs that have weak enforcement mechanisms, and other experts have shown that Chinese companies are concerned that stringent global standards may restrain their business opportunities and competitiveness (Guo et al. 2013, 3). A senior director in a Chinese government agency explained that high global standards could be burdensome for Chinese companies due to their short history of learning

4. For example, Huawei published a statement regarding its cobalt supply chain requiring its upstream suppliers to avoid any social and environmental harm by using certain global governance mechanisms, such as the RCI and RBA (more information is available at: https://www.huawei.com/en/declarations/statement-on-responsible-cobalt-supply-chain, last accessed January 9, 2023).

CSR.[5] For the same reason, another expert interviewee who works in an INGO closely partnering with China also expected Chinese companies to keep reacting passively to a transparency policy with high scrutiny.[6]

On the other hand, this finding reveals a few exceptional cases showing Chinese companies' involvement in thick transparency TEGIs. It is worth mentioning that thirty-two Chinese companies are active members in the London Bullion Market Association's Program (LBMA), a thick transparency governance mechanism which oversees the largest global bullion market. The LBMA trades approximately 900 tons of gold every day and has about 150 members from more than 30 states (Hobson 2018). Its members are required to follow several transparency standards in order to maintain their membership status (LBMA 2020). For instance, Daye Nonferrous Metals Co., one of the largest Chinese copper manufacturing companies, joined the LBMA in 2007. It has since published reports which affirm its compliance with LBMA guidelines and procedures, including publishing a list of its suppliers, its third- party audit information, and the company's due diligence management policy (Deloitte 2021). LBMA membership is an entry ticket to the world's largest bullion market—in other words, access to the market depends on companies' compliance with the LBMA's transparency standards. This strong market incentive may explain Chinese companies' unusually high rate of participation in this particularly thick transparency TEGI.

In sum, Chinese companies' involvement in existing TEGIs appears to reflect their business interests. Their participation can be interpreted as a reaction to increasing international scrutiny of their corporate practices (Economy and Levi 2014, 100) and their desire to improve their reputation in global markets for the economic benefits they hope to derive from having such a reputation (Guo et al. 2013). In short, China's adoption of transparency rules seems to be aiming not at fulfilling grassroots demands for information and the right to know but rather at developing market efficiency and attracting foreign investors (Florini and Jairaj 2014).

Chinese Government Agencies

Chinese government agencies prefer thin transparency initiatives as well (see Figure 6). Compared to Chinese companies, Chinese government agencies participate in fewer TEGIs and are more passive participants—they tend to support transparency norms symbolically, for example, by signing memoranda of understanding or acting as partners on temporary projects (skirting the formal obligation to follow TEGI rules and having only limited say in decision-making processes). The Chinese government's passive engagement with TEGIs signals its limited commitment to existing transparency norms. Interestingly, Chinese governmental agencies engage actively in some TEGIs when initiatives are formed

5. In-person interview, July 21, 2019.
6. Telephone interview, July 23, 2019.

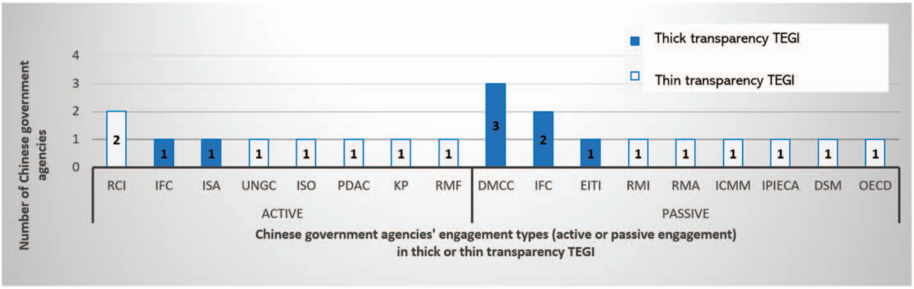

Figure 6
Chinese Government Agencies' Participation in TEGIs

by a sub-body of a traditional intergovernmental organization and the Chinese government is an official member of that organization (e.g., the International Seabed Authority).

There seem to be two explanations for the Chinese government's passive engagement with TEGIs. First, the credibility of a given TEGI partially determines the degree of the Chinese government's active engagement. According to a Chinese expert on Chinese environmental foreign policy, the Chinese government regards the United Nations as a strategic platform to strengthen China's green leadership.[7] It has been supposed that, for example, Chinese officials prefer the United Nations Global Compact (UNGC) to the EITI, which they perceive as a "Western NGO" (Economy and Levi 2014, 109). Although the Chinese government supported the EITI at the 2009 G20 Summit (Economy and Levi 2014, 108) and at least 130 Chinese companies follow the EITI's reporting process in twenty-four EITI implementing countries (Extractive Industries Transparency Initiative [EITI] 2016b), China is not currently a member state of the EITI. Instead, China participates in the EITI passively, for instance, as an invited conference participant (EITI 2016a).

Second, Chinese government agencies engage in TEGIs passively when their primary rules are already set up by foreign actors. This shows China's reluctance to be regulated by foreign institutions. Drezner and Lu (2009) claim that China does not follow international standards when it perceives that these standards are imposed by foreign countries. One of this study's expert interviewees also emphasized Chinese actors' skepticism regarding international standards created without China's input, such as the EITI.[8] According to a statement by China's Ministry of Foreign Affairs, China worries that EITI standards may violate China's noninterference principle (Economy and Levi 2014, 109). This stance emphasizes the Chinese government's autonomy and has been observed across other global governance issues (Bevir and Gaskarth 2015, 80–81).

7. In-person interview, January 14, 2020.
8. Telephone interview, July 23, 2019. See also Preston et al. (2016).

Instead of actively participating in TEGI standards imposed by foreign countries, Chinese governmental agencies have begun to develop their own domestic standards and TEGIs. For example, the CCCMC developed its Guidelines for Social Responsibility in Outbound Mining Investment in 2014 (Chinese Ministry of Commerce 2018) and Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains in 2015 (Chinese Chamber of Commerce of Metals, Minerals, and Chemical Importers and Exporters [CCCMC] 2016a), initiated the Responsible Cobalt Initiative (RCI), and published the Cobalt Refiner Supply Chain Due Diligence Standard based on the OECD Due Diligence Guidance in 2017 in collaboration with the RMI. Through these efforts, the Chinese government aims to resolve many social and environmental problems regarding cobalt production—particularly in the DRC. The RCI appears to be the first Chinese-led global governance initiative advocating for the responsible global supply of the extractive sector. Some large, well-known corporations—including Apple, Hewlett-Packard, Huawei, Samsung SDI, and LG Chemistry—participate in the RCI as official members. Significantly, the RCI did not passively adopt existing global guidelines but instead applied Chinese-derived transparency rules.

There is no clear evidence to describe the actual impact of these Chinese versions of global extractives governance rules on the global governance architecture. However, Chinese governance mechanisms seem to be supporting a thin transparency norm. Although the RCI's membership continues to increase, there is a distinct lack of publicly available RCI documents, and the RCI lacks an official website. This limited accessibility and the lack of civil society actors participating in the mechanism seem to reflect a preference for thin transparency TEGIs.

Conclusions

This mapping exercise shows some significant findings regarding transparency in current transnational extractives governance and China as one of the most influential actors in the governance realm. First, transparency is a dominant norm as a guiding principle in the existing transnational extractives governance architecture. This concept of the transparency norm has been expanded beyond its anticorruption origins to include a wide range of social and environmental aspects. From the global environmental politics perspective, it is especially worth noting that most TEGIs started setting the standards and policies that require members to disclose their environmental impacts (e.g., EITI's environmental impact assessment reporting). On the other hand, more than a majority of TEGIs are operated based on a thin version of transparency norms without sufficient verification mechanisms and information disclosure to the public. This finding resonates with critical approaches to transparency as governance-by-disclosure that question transparency for whom (Gupta 2010; Mason and Gupta 2014; Mol 2008).

Second, many Chinese actors take part in the existing transnational extractive governance landscape, mostly in TEGIs supporting a thin transparency norm. This finding seems to show that China is engaging in this governance structure and adopting a global transparency norm through its participation in TEGIs like other private business actors from North America or Europe do. Despite many concerns about China's threat to the current norm-based global order, this indicates that China is becoming incorporated into the global transparency norm architecture. This finding seems to counter the China threat narrative: China is breaking the existing world order. Meanwhile, this research reveals China's involvement in global governance in a more nuanced way than the previous IR debates about China as a threat or nonthreat in global governance.

Most importantly, it confirms that China does not act as a unified monolithic actor in global extractives governance; rather, different types of actors engage TEGIs distinctively. In the governance architecture, Chinese companies (particularly top Chinese extractive and electronic corporations that are sensitive to their market reputation risk) participate actively in thin transparency TEGIs. On the other hand, almost no Chinese civil society actors and a few very small number of Chinese government agencies are involved in TEGIs. Chinese government agencies are more passive TEGI participants than companies because they are reluctant to be bound by "foreign rules." In response, they developed Chinese versions of transparency standards and their own global initiative, RCI (CCCMC 2016b). This result suggests that Chinese companies and government agencies adopt global transparency norms to the extent to which they could uphold their uncompromising values—market interests and Chinese sovereignty, respectively.

In sum, the most common type of increasing China's presence in transnational extractives governance is that Chinese "companies" participate in thin transparency TEGIs and mostly in private governance mechanisms, consisting of market actors in the global extractive resource supply chain. These Chinese actors' preference for thin transparency TEGIs would be reinforcing a thin transparency norm through their increasing political and market influence. Thin transparency connects to market-focused accountability over democratic accountability in global civil society. Therefore, a potential risk here is that this growing Chinese company participation in private TEGIs may not foster fundamental behavioral changes due to a lack of monitoring and information disclosure to the public, thereby leading to green- or whitewashing of the companies. In such cases, the TEGIs function as unaccountable private clubs supporting private interest over public interest by excluding diverse stakeholders, particularly civil society actors, as Abbot and Snidal (2009) argue. Regarding this point, it is also important to note that Chinese civil society actors play a limited role as watchdogs to monitor Chinese companies.

This finding reconfirms the significance of examining transparency in transnational extractives governance critically by questioning transparency for whom (Mol 2008) and who knows what (Gupta 2010). A transnational governance system based on thin transparency may not lead to positive policy outcomes on the ground, especially regarding democratic values (Dingwerth and Eichinger 2014). It is highly possible that the public and the affected people couldn't access information about social and environmental impacts fairly in the system. Based on a thin transparency norm in TEGIs, companies aim to enhance their image without incurring significant costs. This often empowers large companies and other powerful actors in the market and disempowers weaker agents, such as indigenous communities in mining-affected regions. China's increasing involvement in TEGIs and China's thin transparency norm taking, in particular, could accelerate the current business-to-business transparency, captured by powerful actors like large corporations (Mason and Gupta 2014; Mol 2014). In this sense, developing a thick version of transparency norms in TEGIs and Chinese actors' participation in thick transparency TEGIs matter to empower the most affected communities, people, and nature in the global extractive resource supply chain (see, e.g., Steinberg 2019; Vijge 2018). Also, this is about "just governance" regarding the issue of who is included and excluded in the current transnational extractive governance structure.

China does not challenge the current transnational extractive governance system operated based on transparency as a norm for governance-by-disclosure. Yet this mapping exercise highlights the fact that there are more complex patterns in Chinese actors' engagement in existing TEGIs. It is beyond a dualistic approach to China in global governance—whether China is a threat or a non-threat to the existing governance order and norms. Meanwhile, several questions remain that this research is limited from answering. First, it is too early to assess the extent to which Chinese actors' participation in thin transparency TEGIs leads to negative social and environmental impacts on local mining sites. Future research should examine the correlation between the global and local levels as a multilevel analysis, for example, by exploring how Chinese extractives companies' involvement in thin transparency TEGIs affects nature in the DRC. Second, the finding is limited to confirming that non-Chinese extractive firms participate more in thick transparency TEGIs than non-Chinese companies. A further comparison between Chinese and non-Chinese actors would be a valuable future study. Third, this analysis using one-year data is limited to judging whether Chinese actors would learn transparency rules via their engagement in TEGIs and tend to follow a thick version of transparency over time.[9] Therefore future research needs to investigate potential evolutionary processes and examine what factors foster or hinder their actual behavioral changes.

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9. For instance, Berliner and Prakash (2012) emphasize companies' social learning effects.

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