

NGOs

New NGO Directory –A Brief Commentary on the *Directory of Activity Sectors, the Project Catalog, and the List of Industrial Supervisory Authorities for Foreign Non-Governmental Organizations (2019)*

On April 29, 2019, the Ministry of Public Security of the People's Republic of China (the “**Ministry of Public Security**”) published its *Directory of Activity Sectors, Project Catalog, and List of Industrial Supervisory Authorities for Foreign Nongovernmental Organizations (2019)* (together the “**2019 Directory**”) on its Service and Management Platform for Foreign NGOs¹, the first time it has amended its *Directory of Activity Sectors, Project Catalog, and List of Industrial Supervisory Authorities for Foreign Nongovernmental Organizations (2017)* (together the “**2017 Directory**”) since the 2017 Directory was released on December 20, 2016.

Pursuant to the *Law of the People's Republic of China on the Administration of Activities of Foreign Nongovernmental Organizations in the People's Republic of China* (the “**Foreign NGO Law**”) effective since January 1, 2017, any foreign non-governmental organization (NGO) planning to set up a representative office in China shall identify a competent supervisory authority according to the NGO's scope of activity, the geographical area in which it operates and the necessity of the work it undertakes. Having

acquired the approval from such competent industrial supervisory authority, the NGO shall then file an application to register a China office at a provincial public security bureau.

As perhaps the most significant implementing rule to the Foreign NGO Law, the 2019 Directory aims to further clarify the scope of operations and the categories of activity for foreign NGOs and the corresponding industrial supervisory authorities as specified in the 2017 Directory, in order to provide NGOs with more detailed guidance for their operations in China.

We hereby summarize our high-level comments on the key changes and highlights, as well as drawing our attention to some of the remaining uncertainties of the 2019 Directory.

Part I. New developments in the 2019 Directory

The 2019 Directory elaborates on and expands the categories of activity and scope of operations of foreign NGOs, and provides specific and detailed guidance for NGO operations in China.

It is indicative of the Chinese Government's intention to welcome and encourage foreign

¹ <http://ngo.mps.gov.cn/ngo/portal/index.do> (last accessed: May 30, 2019).

NGOs.

The 2017 Directory and 2019 Directory specify the same nine sectors in which foreign NGOs are permitted to operate - Economics, Education, Science and Technology, Culture, Health, Sports, Environmental Protection, as well as the sector of “Poverty Alleviation, Disaster Relief and Similar Items” and an “Other” sector. However, while the 2017 Directory listed 54 categories and 195 major projects, the 2019 Directory extends the scope to 65 categories and 237 major projects. The 2019 Directory also makes some changes in terms of the relevant industrial supervisory authorities.

1. Changes in Categories

The changes in categories introduced by the 2019 Directory include the following:

- (1) Within Economics, the category “information and telecommunication” is changed to “industrialization and informatization”;
- (2) Within Culture, “culture and arts” becomes “culture, arts and tourism”; “broadcasting, film and television” becomes “broadcasting, television, audiovisual network”; and “press publication and copyright” divides into the separate categories of “press and publication” and “copyright”;
- (3) Within Health, “food and drug” is separated into “drug management” and “food”;
- (4) Within Environmental Protection, “wildlife conservation” becomes “wildlife and its habitat conservation”, the “construction of protected categories, national parks, scenic spots and forest parks” is extended to become “construction of protected fields, national parks, scenic spots, forest parks and geological parks”;
- (5) Within “Others”, the category “legal service” becomes “legal work exchange”; “fellowship exchange in the area of foreign Chinese affairs” is

amended to “exchange in the area of foreign Chinese affairs”; “natural person movement” becomes “natural person movement research, exchange and cooperation” under the category “human resources and social security”, and the 2017 category “introduction of foreign talents research, exchange and cooperation” is deleted.

There are 11 additional categories included in the 2019 Directory:

- (1) Economy now includes “civil aviation”, “natural resources” and “market supervision”;
- (2) The Science and Technology sector includes the new category “quality basis”;
- (3) Culture now includes “films”;
- (4) Environmental protection includes five new categories: “ecological restoration”, “forestry reform”, “forestry industry development”, “grassland ecological protection”, and “watershed ecological environment protection”;
- (5) The sector of Others now includes “friendly exchanges with foreign countries”.

Most of the newly added or expanded categories are in environmental protection, which in our view reflects China’s increasing focus on this sector.

2. Changes in Major Projects

Along with the changes and additions to categories, there have been numerous associated changes in the major projects listed in the 2019 Directory. For example, within the new category “natural resources”, there are three types of main project listed, namely: “coastal zone planning, and theoretical marine planning, cooperation and exchange”; “cooperation and exchange in geographic information” and “mapping policy, technical exchange and cooperation”. Given the large number of changes,

it is beyond the scope of this summary to provide details of all the new projects listed in the latest Directory. For further details, it is recommended to refer to the 2019 Directory.²

3. Changes in Industrial Supervisory Authorities

The overall number of competent supervisory authorities has increased. In response to the increase in the scope of operations, the 2019 Directory adds new industrial supervisory authorities, including the Chinese Council for the Promotion of International Trade and its provincial counterparts, the Ministry of Natural Resources, the External Relations Department of the Central Committee of the Communist Party of China, the Civil Aviation Administration of China, the Chinese People's Association for Friendship with Foreign Countries, the National Ethnic Affairs Committee, the National Food and Materials Reserve Bureau, the Foreign Chinese Federation and the Provincial Foreign Chinese Federation. Following the 2018 institutional reform of the State Council³ and the subsequent institutional restructuring, the 2019 Directory shows some newly established national and provincial government departments taking over the responsibilities of their predecessors. Those categories that previously fell under the State Administration for Industry and Commerce have been transferred to the State Administration for Market Supervision and Management, and those that were under the Ministry of Environmental Protection are now the responsibility of the Ministry of Ecological Environment.

However, the 2019 Directory maintains a key rule established in the 2017 Directory, namely that if a foreign NGO sets up a representative office that

falls within more than one category of activity, the NGO shall have only one, single industrial supervisory authority, and it shall be based on its primary category of activity and scope of operation. For any activities beyond the scope of the supervisory authority, opinions shall be solicited from other competent authorities, and shall be coordinated to enable joint supervision and administration.

Part II. Ambiguities in the 2019 Directory

1. Pending Provincial Directory

As was the case in the 2017 Directory, the 2019 Directory authorizes provincial public security bureaus to formulate and publish their own *Provincial Directory of the List of Activity Sectors, Project Catalog, and List of Industrial Supervisory Authorities for Foreign Non-Governmental Organizations*, which shall be in line with local practices and in developed conjunction with local supervisory authorities, and which shall further provide guidance to foreign NGOs about how to lawfully undertake their activities in China.

Shanghai, Guangdong and some other provinces had already, on the basis of the 2017 Directory, previously published their own provincial Directory. It remains to be seen whether these provincial directories will be updated to reflect the changes within the 2019 Directory.

Generally speaking, it would appear that the Ministry of Public Security is continuing to allow the provincial public security bureaus with flexibility in terms of their provincial Directory.

Those provincial authorities that had already released their own Directory did not generally introduce many changes when compared to the national level Directory. Those provinces that have not developed their provincial Directory have tended to base their daily administration on the national Directory. In summary, there does not

²http://ngo.mps.gov.cn/ngo/portal/view.do?p_articleId=192153&p_topmenu=2&p_leftmenu=5 (last accessed: May 30, 2019).

³Institutional Reform Plan of the State Council (2018) (released by the National Peoples' Congress of the People's Republic of China on March 18, 2018 and coming into effect on March 18, 2018).

appear to be significant material risk in the establishment of China offices by foreign NGOs due to uncertainty over the release of any pending provincial Directory.

2. Uncertainty in Supervisory Authorities

There are three main areas of uncertainty relating to the practical implementation of the Directory by supervisory authorities, namely:

- (1) The activities of a foreign NGO may cover more than one category of activity or multiple major projects within the same activity category. The various categories of activity or major projects may fall within the responsibility of different supervisory authorities. While the *Guide on Registration and Filing for Temporary Activities of Representative Offices of Foreign Non-government Organizations* (the “**Guide**”) states that a foreign NGO shall turn to only one supervisory authority based upon its primary activity, the term “primary activity” used by the Guide is, itself, ambiguous.
- (2) According to the 2017 and the 2019 Directories, national and provincial supervisory authorities are both authorized to supervise similar activities of NGOs. As an example, the major project area of “international statistical theory research, communication and cooperation” could be supervised by the National Bureau of Statistics or by its provincial counterparts. This may lead to some uncertainty about whether the correct supervisory authority is at the national or provincial level. As already indicated, the 2019 Directory does not provide any guiding rules in this regard. Our previous discussions with supervisory authorities suggest that views and positions in this matter may vary among different kinds of supervisory authorities, and at the different

levels.

- (3) According to the 2017 and 2019 Directories, certain major projects may be supervised by multiple kinds of supervisory authorities. For example, NGO activities in respect of “international energy efficiency planning, policies, technology, standards, regulatory research, exchanges and cooperation” could be covered by the National Development and Reform Commission, the National Energy Administration or their provincial counterparts.

It is currently difficult to assess whether these uncertainties will have an overall positive or negative impact on the establishment of NGO’s China offices. On one hand, uncertainty over which is the appropriate supervisory authority may in fact prolong the application process of a foreign NGO, with the NGO unable to determine from the Directory which authority should receive its application; in such instance, the NGO may be required to communicate with each potential industrial supervisory authority, which will likely require additional resources and expenditure. On the other hand, such uncertainties may provide NGOs with some flexibility to select a supervisory authority from several possible options. The Directory lists both national and provincial industrial supervisory authorities for all projects, and for certain projects, lists a number of different kinds of supervisory authorities, which in effect broadens the range of choices. In practice, this means that even if a foreign NGO was declined by one industrial supervisory authority, that NGO could potentially turn to another supervisory authority.

Therefore, while there is some benefit – for example requiring fewer resources - in having one-to-one correspondence between a major project and just one industrial supervisory authority, this approach may also narrow the options available to foreign NGOs in choosing an

industrial supervisory authority.

Ultimately, a more effective approach for central government would be to promulgate further institutional regulations, guidance, standards, and thereby improve the effectiveness of communication and coordination between the different kinds and levels of supervisory authorities, and also lower the resources required by and application costs for NGOs.

3. Uncertainties in Multiple Offices in China and One Supervisory Authority

In terms of the category of activity as described, according to the 2019 Directory, if a foreign NGO establishes a representative office covering more than one activity category, the NGO shall identify only one industrial supervisory authority which will be determined by its primary activity category and its major operation scope.

In terms of the geographic area of its activities, according to the Guide, the China office of a foreign NGO may carry out activities in more than one province as long as the registered geographic area of the China office is consistent with its actual scope; also according to the Guide, a foreign NGO may establish two or more representative offices, but the categories of activity of each representative office shall not overlap each other.

The above rules allowing for multiple offices but only one supervisory authority may lead to complications if a foreign NGO establishes two or more representative offices in different provinces. Specifically, the issue arises whether or not such representative offices are required to be supervised by the same kind of supervisory authorities.

For example, if the Shanghai office of a foreign NGO is supervised by Shanghai Health Commission as its industrial supervisory authority,

would its Beijing office be supervised by the Beijing Health Commission or another supervisory authority as listed in the 2019 Directory, for example the civil administrative department?

As of the date of this legal update, we have not yet seen any ruling in response to this issue, and there is uncertainty about its practice among the Ministry of Public Security and its provincial counterparts.

Part III. Conclusion

As of May 2019, according to the Service and Management Platform for Overseas NGOs under Ministry of Public Security, a total of 478 overseas NGO China offices had been established, with most of the major projects in the sectors of economics, health and education. Correspondingly, the most commonly used supervisory authorities were provincial commerce, health and education authorities.⁴

Our review of the 2019 Directory indicates that most of the newly added or expanded categories are in environmental protection, which in our view is in keeping with China's increasing focus on this sector.

More generally, as described earlier, the 2017 Directory has helped play a positive, practical role, providing supporting documents for the Overseas NGO Law. We believe that the 2019 Directory will further promote such positive influence and provide more detailed guidance to overseas NGOs in their requirement to have an appropriate supervisory authority.

While there remain some uncertainties in relation to various issues of practical implementation, we believe these will gradually be clarified, resolved

⁴ <http://ngo.mps.gov.cn/ngo/portal/toInfogs.do> (last accessed: May 30, 2019).

and communicated through the joint efforts of the Ministry of Public Security and its provincial

counterparts and the relevant industrial supervisory authorities.

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NGO 法律热点问题

NGO 新名录——《境外非政府组织在中国境内活动领域和项目目录业务主管单位名录（2019）》简评

2019年4月29日，中华人民共和国公安部（简称“公安部”）于境外非政府组织办事服务平台网站上（<http://ngo.mps.gov.cn/ngo/portal/toGuideml.do>）¹公布了《境外非政府组织在中国境内活动领域和项目目录业务主管单位名录（2019）》（以下简称“《目录（2019）》”）。这是公安部自2016年12月20日首次公布《境外非政府组织在中国境内活动领域和项目目录、业务主管单位名录（2017）》（以下简称“《目录（2017）》”）以来，对原目录做出的首次修改与更新。

根据2017年1月1日起施行的《中华人民共和国境外非政府组织境内活动管理法》（以下简称“《境外 NGO 管理法》”）的规定，如境外非政府组织在中国境内申请设立代表机构，应根据业务范围、活动地域和开展活动的需要确定业务主管单位，并经业务主管单位同意后，向所设立代表机构所在地的省级人民政府公安机关申请登记。作为《境外 NGO 管理法》的配套性文件，《目录（2019）》旨在《目录（2017）》的基础上，进一步明确境外非政府组织（以下简称“境外 NGO”）可在中国境内开展活动的业务范围及活动领域，以及针对不同业务范围与活动领域的相应的业务主管单位，进一步为境外非政府组织在境内依法开展活动提供指引。以下，我们将对《目录（2019）》的主要更

新、亮点以及部分尚待明确之处作简要分析。

一、新目录中的新发展

总体而言，《目录（2019）》进一步细化和扩宽了境外 NGO 的活动领域与业务范围，为境外 NGO 在境内开展活动提供了更加明确、详实的指引，进一步体现了中国政府鼓励境外 NGO 进入中国并在中国合法合规地开展活动的意愿和决心。

《目录（2017）》规定，境外 NGO 可在共计9大领域、54个子领域、195个主要项目的范围内开展活动，而《目录（2019）》规定，境外 NGO 可在共计9大领域、65个子领域、237个主要项目范围内开展活动。

《目录（2019）》维持了原《目录（2017）》所列的9大领域（即经济、教育、科技、文化、卫生、体育、环保、济困、救灾等方面与其他），而针对“子领域”、“主要项目”和“业务主管单位”进行了一系列调整和细化。

1、子领域的变化

就“子领域”而言，一方面，《目录（2019）》针对《目录（2017）》中的部分子领域进行了适当调整：

- （1）“经济”大类下：“信息通信”扩充为“工业和信息化”；

¹ <http://ngo.mps.gov.cn/ngo/portal/index.do>（最后访问时间：2019年5月30日）。

- (2) “文化”大类下：“文化艺术”扩充为“文化艺术和旅游”，“广播影视”扩充为“广播电视和网络视听”，“新闻出版著作权”拆分为“新闻出版”和“著作权”；
- (3) “卫生”大类下：子领域“食品药品”拆分为“药品管理”和“食品”；
- (4) “环保”大类下：子领域“野生动植物保护”扩充为“野生动植物及其栖息地保护”，“保护区、国家公园、风景名胜区、森林公园建设”扩充为“保护区、国家公园、风景名胜区、森林公园、地质公园建设”；
- (5) “其他”大类下：子领域“法律服务”修改为“法律工作交流”，“侨务领域联谊性交流”修改为“侨务领域交流”，原子领域“自然人移动”变更为子领域“人力资源和社会保障”项下的主要项目“自然人移动研究、交流与合作”，以及删除了原子领域“引进外国人才研究、交流与合作”。

另一方面,《目录(2019)》相对于《目录(2017)》中增加了 11 个子领域,包括:

- (1) “经济”大类:民用航空、自然资源、市场监管;
- (2) “科技”大类:质量基础;
- (3) “文化”大类:电影;
- (4) “环保”大类:生态修复、林业改革、林业产业发展、草原生态保护、流域生态环境保护;
- (5) “其他”大类:对外友好交流。

可以发现,环保大类增加(细化)的子领域最多,我们理解这侧面反映了国家对环保领域的重视程度不断增强。

2、主要项目的变化

由于子领域的增改,子领域项下细分的主要项目也随之增改,例如在新增的子领域“自然资源”项下,分别新增了“海岸带规划、海洋规划的理论研究、合作与交流”、“地理信息领域的合作与交流”及“测绘政策、技术交流与合作”三个主要项目。鉴于主要项目的增改之处较多,此处不再一一列举,具体可参见:《目录(2019)》第三列“主要项目”一栏。²

3、业务主管单位的变化

业务主管单位的变化以增加为主。为了适应增加的活动领域,《目录(2019)》相应新增了业务主管单位,包括中国国际贸易促进会及省级人民政府主管部门、自然资源部、中共中央对外联络部、中国民用航空局、中国人民对外友好协会、国家民族事务委员会、国家粮食和物资储备局、中国侨联及省级侨联等。同时,为了与 2018 年国务院机构改革³保持一致,原先由某些国家或省级主管部门所负责的活动领域现改由机构调整后的相应国家或省级主管部门负责,例如,原国家工商行政管理总局及省级人民政府主管部门负责的活动领域现由国家市场监督管理总局及省级人民政府主管部门主管,原环境保护部负责的活动领域现由生态环境部主管。

值得注意的是,尽管存在上述修改,《目录(2019)》沿袭了《目录(2017)》的一个重要规定:境外 NGO 设立代表机构涉及多个活动领域的,应以其主要活动领域和主要业务范围确定一个业务主管单位,所涉及其他领域的活动内容,主要业务主管单位可以征求相关部门的意见,相关主管部门积极配合,共同做好服务管理工作。

二、新名录中的不确定

1、地方省级目录尚待出台或更新

² http://ngo.mps.gov.cn/ngo/portal/view.do?p_articleId=192153&p_topmenu=2&p_leftmenu=5 (最后访问时间:2019 年 5 月 30 日)。

³ 《国务院机构改革(2018)》(全国人民代表大会 2018 年 3 月 18 日发布,同日生效)。

《目录（2019）》延续了《目录（2017）》的要求，即各省级人民政府公安机关应当结合本地实际，会同有关部门，参照本目录名录，研究制定并发布本地区《境外非政府组织活动领域和项目目录、业务主管单位名录》，为境外 NGO 在境内依法开展活动提供指引。

一方面，上海、广东等省份已经依据《目录（2017）》陆续出台了相应的地方目录，这些地方目录有待于根据新出台的《目录（2019）》进行更新；另一方面，那些尚未出台地方目录的省份，其省级人民政府公安机关此次是否会根据《目录（2019）》而制定地方目录，也有待于观察。

总体而言，我们认为，公安部将继续给予省级公安机关结合本地实际制作地方目录的空间。同时根据我们观察，那些已出台地方目录的省份通常不会对公安部发布的目录进行太多改动，而那些未出台地方目录的省份，也可能主要参考公安部发布的目录版本，因而不会对代表机构的设立申请产生实质性影响。

2、业务主管单位的不确定性

实践中，业务主管单位的不确定性主要来源于以下三个方面：

其一，境外 NGO 设立代表机构有时会涉及多个活动领域或者同一活动领域内的多个主要项目，而不同活动领域或者不同主要项目对应的业务主管单位有所不同。尽管《境外非政府组织代表机构登记和临时活动备案办事指南》（以下简称“《办事指南》”）规定，境外 NGO 设立代表机构应当根据主要活动领域确定业务主管单位，但是有时“主要活动领域”本身也因具有模糊性而难以确定。

其二，无论是《目录（2017）》或是《目录（2019）》，每个主要项目均同时对应国家级业务主管单位及省级业务主管单位（例如主要项目之一“国际统计理论研究、交流与合作”对应“国家统

计局及省级人民政府主管部门”），而究竟应当由国家级还是省级业务主管单位来主管，如上所述，《目录》本身并无任何规定。根据之前我们与相关业务主管单位的沟通，不同业务主管单位及同一业务主管单位不同级别之间对于此点也无明确统一标准。

其三，无论是《目录（2017）》或是《目录（2019）》，均存在同一个主要项目对应多个业务主管单位的情况。例如，“国际能源能效规划、政策、技术、标准、监管研究、交流与合作”同时对应“国家发展改革委、国家能源局及省级人民政府主管部门”。

上述不确定性对境外 NGO 代表机构设立的影响似乎不能简单以好坏论之。一方面，业务主管单位的不确定性客观上可能延缓了境外 NGO 申请境内代表机构的进程：由于试图在中国境内设立代表机构的境外 NGO 可能无法仅凭《目录》来准确预判主管其活动的唯一的业务主管单位，该境外 NGO 实际上需要花费更多的时间与各潜在业务主管单位进行沟通。另一方面，该等不确定性也在一定程度上赋予了境外 NGO 申请业务主管单位的灵活性：《目录》对于所有项目均列出了国家级及省级业务主管单位，以及对某些项目列出了若干业务主管单位，事实上拓宽了境外 NGO 可申请的业务主管单位的选择范围。换言之，即使该境外 NGO 被其中某家业务主管单位拒绝，也可在《目录》规定的业务主管单位范围内另行申请。

因此，若要减少申请业务主管单位的不确定性而导致的额外成本，似乎并不在于进一步修改《目录》，从而使主要项目和业务主管单位实现绝对意义上的一一对应，使境外 NGO 能根据《目录》径直确认唯一的业务主管单位——事实上，这样反而可能缩小境外 NGO 设立代表机构的选择空间。更有效的办法可能在于出台制度性规定，引导、规范、加强国家级业务主管单位和省级业务主管单位、平级的各业务主管单位之间的沟通与协调。

3、设立两个以上代表机构与业务主管单位的唯一性中的不确定

一方面,根据《目录(2019)》规定,境外 NGO 设立代表机构涉及多个活动领域的,应以其主要活动领域和主要业务范围确定一个业务主管单位。另一方面,根据《办事指南》的规定,境外 NGO 代表机构可跨省开展活动,但活动地域要与其业务范围和开展活动的实际情况相符;同时一个境外 NGO 可以设立两个以上代表机构,但每个代表机构确定的活动地域之间不得相互重叠交叉。

这两项规定存在一个潜在问题:即同一境外 NGO 在不同活动地域设立的两个以上代表机构,这些代表机构是否都应由同类业务主管单位来主管。例如,某一境外 NGO 在上海市的代表机构申请由上海市卫生健康主管部门作为业务主管单位,是否意味着其北京市代表机构也应申请由北京市卫生健康主管部门作为业务主管单位,而不能申请由民政部门主管?目前在法律层面对这一问题尚无规定,可能有待于实践中公安部或省级人民政府公安机关的解释。

三、 小结

根据公安部境外非政府组织平台上的公示信息,截至目前,已成立并公示的境外非政府组织代表机构一共有 478 个⁴,主要项目较多集中于经济领域、卫生健康领域、教育领域等,而担任业务主管单位较多的是省级商务主管部门、省级卫生健康主管部门、省级教育主管部门等。

同时,《目录(2019)》中,环保领域的新增或细化的子领域最多,这一事实也表明了我国对环保领域愈加重视的态度。

《目录(2017)》作为《境外 NGO 管理法》的配套文件,在实践中对《境外 NGO 管理法》的施行确实起到了有效的引导作用。相信本次《目录(2019)》的出台将继续深化这一作用,为境外 NGO 申请业务主管单位提供更加细化、具体的指引。

与此同时,我们也注意到部分操作问题仍需要在实施过程继续总结,不断修正,通过与公安部门及其他相关部门的沟通而得到逐步澄清、解决。

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⁴ 参见: <http://ngo.mps.gov.cn/ngo/portal/toInfogs.do> (最后访问时间: 2019 年 5 月 30 日)。