

Visibility in Dilemma:

Institutional Work in the Regulatory Practices of Protestant Churches in Wenzhou, China

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ABSTRACT: Although scholars have explored the regulatory governance of Christianity at the local level, less attention has been paid to the ambiguity, tension, and inconsistency of the religious policies imposed by the central government and its challenges to local bureaucrats' regulatory practices. Offering insight into the theory of institutional work, this article intends to address this gap, revealing how local bureaucrats in Wenzhou, Zhejiang Province, employ contextual solutions (e.g., discursive work, selective implementation, and operational work) to repair the top-down policy problems they encounter. In the post-Mao era, the visibility of local Protestant organisations, in a physical and metaphorical sense, has been entangled with contradictions in religious regulations and the central-local discrepancy.

KEYWORDS: Protestantism, institutional work, informal regulation, discursive work, selective implementation, operational work, local bureaucrats.

Since the 1980s, China's central government has reversed the Maoist radical political agenda and loosened its restrictions on religious practices. Christianity has consequently gone above ground and has witnessed a conspicuous revival. Cao (2007: 46) estimated that the number of Protestants in China increased more than 85-fold between 1949 and 2007, with an estimated 60 million Protestant Christians in the country. In the 2010s, overseas observers were predicting that China would have the largest Christian population in the world in the 2020s.¹ But the authoritarian state continues to view religions as "potential rivals on ideological, organisational and financial grounds" (Lai 2006: 56). The very trends that observers cited in predicting the growth of Chinese Christianity have sparked a claim by the government that a "Protestant fever" is afflicting the country. Citing building and zoning violations, the government has instituted campaigns to remove crosses from the tops of church buildings, making their religious purpose difficult to ascertain,² and has advocated for the sinicizing of Christianity (*jidujiao Zhongguohua* 基督教中國化).³ Observers and Christian groups have viewed these moves as harbingers of the central government's potential return to the old

Maoist coercive approach of diminishing Christianity.

Both the surge and the backlash have occurred in the context of the central state attempting to routinise administrative practices affecting religious organisations and practices. It began in 1982 with Document 19⁴ and gradually incorporated more detailed administrative decrees, such as the revision of

1. Jamil Anderlini, "The Rise of Christianity in China," *Financial Times*, 7 November 2014, <https://www.ft.com/content/a6d2a690-6545-11e4-91b1-00144feabdc0> (accessed on 7 August 2022).
2. Michael Forsythe, "Chinese Province Issues Draft Regulation on Church Crosses," *The New York Times*, 8 May 2015, <https://www.nytimes.com/2015/05/09/world/asia/china-church-crosses.html> (accessed on 20 September 2022).
3. This slogan of sinicization, "officially introduced at the Central United Front Work Conference in 2015, connotes a state initiative to press religions in China to incorporate Chinese characteristics into their beliefs and practices." Because of Christianity's historical connections with the West, it has been targeted for "the initial adoption and formulation of religious sinicization" (Chang 2018: 37-8, 39).
4. Chinese Communist Party Central Committee 中國共產黨中央委員會, "關於我國社會時期宗教問題的基本觀點和基本政策" (*Guanyu woguo shehui shiqi zongjiao wenti de jiben guandian he jiben zhengce*, The basic viewpoint and policy on the religious question during China's socialist period), 31 March 1982, <http://baike.baidu.com/item/关于我国社会主义时期宗教问题的基本观点和基本政策/4900600> (accessed on 10 January 2023).

Regulations on Religious Affairs in 2017,⁵ and more specific regulatory measures.⁶ However, the guiding principles have been ambiguous, from sinicization to “reasonable allocation of churches and religious gathering spots” (*tangdian de heli buju* 堂點的合理佈局). Such uncertainties in the regulation of religion have “extended the scope of bureaucratic discretion” (Chang 2018: 38). Also, institutionalisation endeavours designed to increase the legibility of religious groups and activities, such as the acceptance and management of previously unregistered Protestant groups,⁷ is increasing the cost of implementing religious regulations even as, by providing an official count of churches, it reinforces claims of a Protestant fever gripping the population. Furthermore, inconsistency and discontinuity are not rare in the policies of the Protestant churches, creating instability in church-state relations. All this raises questions about how religious regulators on the ground apply the ambiguous institutional prescriptions to the local context, deal with the tension between legibility (Scott 1998: 2-3) and visibility, and build legitimacy into the inconsistent institutionalisation of Protestant Christianity. The ambiguity, tension, and inconsistency in the regulation of religious institutions devised by the central government have posed a challenge for local bureaucrats seeking to implement these policies and measures.

This article explores the complicated mechanisms of the post-socialist state’s regulations applied to Protestant Christianity by focusing on the concerns and practices of local bureaucrats in “China’s Jerusalem” – Wenzhou, Zhejiang Province – based on fieldwork spanning 19 years, from 2003 to 2022.⁸ Thus we take a longitudinal approach, understanding how local bureaucrats mediate and channel the tools at their disposal to create contextualised, collaborative, and effective control over the growth of the local Protestant population.

We conducted ethnographic research in the local Religious Affairs Bureau (RAB) and other administration bureaus in Aoyang County, Wenzhou.⁹ We investigated how local state agents interpret and implement religious regulations and policy directives prescribed by the central government. We also sat in on meetings of the local Protestant Three-Self Patriotic Movement (TSPM) and China Christian Council (CCC) to observe how the pastors and elders of these organisations mediated the relationship between the local government and Protestant followers.¹⁰ In addition, we visited churches with diverse positions and attitudes toward the state’s administration, to observe their interactions with local regulators. Through a close look at the interplay between lower-level bureaucrats and Protestant organisations, we intend to present complex dynamics of local religious governance.

Local bureaucrats are on the front lines of the effort to implement religious regulations and enjoy considerable discretion. Their strategies and performances have unique significance in religious regulation in China. At the local level, the officials responsible for religious regulation generally include bureaucrats from the local RAB and the United Front Work Department (UFD) and police from the local Public Security Bureau (PSB). Although in principle these entities have distinct focuses,¹¹ in practice their duties overlap. The local RAB bureaucrats and PSB police may work together to enforce regulations on religious organisations. The local UFD bureaucrats focus on the Protestant clergy, but they

also get involved in solving serious religious disputes. At the same time, even with three state agencies engaging with local religious regulation, personnel are scarce; for example, the maximum number of officials at the local RAB at any one time is five, and only one police officer at the PSB maintains routine supervision of the more than 350 Protestant churches and informal congregations in Aoyang County as his main responsibility.

To understand the rationale and practices of the local bureaucrats, we examine how their multiple responsibilities, resource-scarce environment, and practical knowledge (Scott 1998: 309-41) are entangled in the execution of their daily work. They are expected to manage and supervise the local Protestant organisations, control their rapid growth and social influence, prevent and punish any regulatory violations, suppress any political threat they pose to the regime,¹² and at the same time, avoid creating any threats to social stability. This paper further asks three questions: First, how did the local state agents distribute their efforts and determine whether to restrict or tolerate? Second, what strategies did local bureaucrats employ to handle personnel and process scarcity¹³ (Masood and Nisar 2022)? Finally, given that local bureaucrats serve to close the gap between the principles the central state provides and local realities, how has their practical response to the state’s desire to

5. State Council 國務院, “宗教事務條例” (*Zongjiao shiwu tiaoli*, Regulations on Religious Affairs), 26 August 2017, https://www.sara.gov.cn/gjzswj/2022-10/25/article_2022102521283373175.shtml (accessed on 10 January 2023). This revised central government regulation on the management of religion covers the administration of religious organisations, academies, venues, clerics, and property. Ying (2016a) has analysed the changes in the Regulations compared with the 2004 version.
6. National Religious Affairs Administration 國家宗教事務局, “宗教臨時活動地點審批管理辦法” (*Zongjiao linshi huodong didian shenpi guanli banfa*, Approval and management of temporary religious congregation sites), 22 February 2018, https://www.sara.gov.cn/gjzswj/2022-10/25/article_2022102521353597684.shtml (accessed on 10 January 2023); National Religious Affairs Administration and Ministry of Civil Affairs 國家宗教事務局, 民政部, “關於宗教活動場所辦理法人登記事項的通知” (*Guanyu zongjiao huodong changsuo banli faren dengji shixiang de tongzhi*, On registration of places for conducting religious activities as legal persons), 25 January 2019, https://www.sara.gov.cn/gjzswj/2022-10/25/article_2022102521353571503.shtml (accessed on 10 January 2023).
7. “宗教臨時活動地點審批管理辦法” (*Zongjiao linshi huodong didian shenpi guanli banfa*, Approval and management of temporary religious congregation sites) was interpreted as a sign for legal acceptance of unregistered and compliant churches or gathering spots (Ying 2016a).
8. Yujing Zhu began her first project to study Christianity in Wenzhou in 2003 (five months’ fieldwork). In 2009 she returned to Wenzhou for her PhD research (13 months’ fieldwork). Finally, in 2014, 2016, and 2022, we resumed connections with former informants in Wenzhou to update the data.
9. Pseudonyms are used throughout this article to refer to places, organisations, and informants.
10. Theoretically, the TSPM takes over the duty of supervising Protestant activities, and the CCC is responsible for ecclesiastical affairs, such as theological education and ordaining clergymen.
11. Sun (2017: 1696-7) laid out the division of responsibility among the local RAB, UFD, and PSB, but simplified their actual responsibilities. For example, PSB police get involved in the regulation of legally registered churches and house churches as well as what Sun described as “evil cults.”
12. As we will discuss later, such threats have been constructed differently in different periods. For example, according to the archive of the local RAB, in the early 1980s, unregistered churches that insisted on “the separation of church and state” and that “avoided state interference” were labelled “counterrevolutionary” religions and suffered crackdown. In our 2009 fieldwork, local bureaucrats tolerated such unregistered “independent churches.” In recent years, there has been a shift back, and even registered churches may face repression for “unlawful building.”
13. Policy directives from the central government include control of the growth of Protestantism and sinicization, but there is a lack of a “officially sanctioned menu of routines or procedures” (Masood and Nisar 2022: 256).

contain Protestant expansion avoided causing turbulence while revising the decontextualised measures imposed by the central government?

Church-state relations in postsocialist China

With the visible revival of Christian populations and churches in the early years of the post-Mao period, some overseas observers and researchers (Aikman 2003; Stark and Wang 2015) made optimistic assumptions about the future of Christianity in China. They predicted that as more educated and urban elites joined churches, Christians would embrace strong civic characteristics and play an important role in the country's democratisation in the future. This decontextualised reading of the growth of Christianity ignored the political context enabling that growth and thus overestimated the agency of Christian organisations in China.

For a better understanding of the role and performance of churches in post-Mao China, scholars should examine the structural constraints and the opportunities the state's politics create (Bays 2003). For example, Sun (2017: 1664) stipulated that the post-Mao state has "dissolved the locally entrenched social/cultural resistance to Protestant[ism]" and promoted market reform that "created an environment conducive to the expansion of Protestantism." Wang (2020) and Chow (2021) analysed how the legacy of Maoist politics influenced churches' integration into the state regulatory system while retaining internal schisms and denominationalism within Christianity in the post-Mao period. These empirical studies shed light on the way in which the state's politics have shaped the situation and characteristics of churches by exerting an effect on the competition among different religions and intra-church/inter-church politics.¹⁴

A large scholarly literature focuses on church-state relations in China (Goossaert and Palmer 2011; Koesel 2014; Sun 2017; Vala 2017; Reny 2018), going beyond the dominance-resistance paradigm and presenting the complex and dynamic interplays between authoritarian power and Protestant organisations. Researchers (Potter 2003; Leung 2005; Palmer 2009) have cautioned that the post-Mao state's institutional acceptance of the recovery of Christian churches should not be taken as indicative of the state's softened control over Christianity. On the contrary, the institutionalisation of religious regulation has worked to keep Christian organisations in check through frequent monitoring as local governments have legitimacy and legal codes. Nevertheless, the institutionalisation process is entangled with some implicit policy directives coined in new terms (Ying 2016a; Chang 2018). In recent decades, the state's growing anxiety about Christianising China (*Zhongguo jidujiaohua* 中國基督教化) has led to more restrictive attitudes towards the expansion of Christianity in China, with new concepts and measures for greater control, such as the slogan "Sinicizing Christianity." Scholars have documented how governmental actors have devised new concepts and discourses to sustain or transform the institutionalisation efforts. For instance, bureaucrats have demanded that Christians express patriotism, and thus loyalty to the Party-state (Vala 2013), and conceive of cross-removal as part of the political project to sinicize Christianity (Cao 2017: 44).

More recently, some scholars have made an analytical turn by identifying the management of Christianity as a local game and taking a closer look at the practices of religious governance at the local level. The lower-level bureaucrats who adapt institutional principles and methods to the local context are the topic of a number of studies. Liu and White (2018) have argued that the local RAB bureaucrats in Xiamen engaged in dialogue and negotiation with a Protestant elite based on the Three-Self church structure, and that frequent interactions forged positive relations between bureaucrats and these elites. Mcleister's (2013) research reported similar findings in Zhejiang. Vala (2017) attributed the existence of unregistered churches to mutual trust and information between local bureaucrats and some Christian elites. Reny (2018) argued that local bureaucrats' strategy of containment on house churches was bound and conditional on their keeping a low profile and sharing information with the PSB. Zimmerman-Liu and Wright (2013) have developed an explanation scheme that includes some variables to address the situation of "underground" churches in China, such as the location of Christian organisations and 關係 (*guanxi*, relationships or social network), as well as political and economic pressures that the local cadres face.

With a contextualised view of church-state relations, this body of localised analyses has successfully identified some key variables in the discussion of the intricate interactions between church and state. However, the existing literature has yet to theorise how local bureaucrats are often caught between the inconsistent and often conflicting formal measures imposed by the central government and the complicated local societies. Since the 1980s, the administrative frameworks of the central government have been fluctuating between tolerance and restriction towards Christian churches. Central administrations always disregard specific local contexts, and their formal measures and regulations have been full of ambiguity and contradictions, with multiple inconsistent and often conflicting logics. While some scholars have recognised that such a policy environment presents serious challenges to local governments (Ying 2016a; Chang 2018), how local agencies handle such ambiguity and contradictions in policy implementation remains understudied. In particular, the reform of religious regulation has been a trial-and-error process. Regulatory measures are revised over time, and scrapped measures can be brought back. Yet little is known about how local agencies cope with such disruptions and discontinuity while maintaining the façade of policy consistency in their bureaucratic routines, because most studies are based on short-term cases.

This article offers a longitudinal approach to understanding local bureaucratic practices. To do so, it draws on data collected over 19 years and incorporates the literature of institutional work from state theory. Institutional work refers to "the purposive action of individuals and organisations aimed at creating, maintaining, and disrupting institutions" (Lawrence, Suddaby, and Leca 2009: 215). In this article, we attempt to explore how local bureaucrats have

14. One example of inter-church politics is the competition for religious spaces among TSPM churches and unregistered churches. As for intra-church politics, one typical example is the conflict over clergy positions, which often involve competitive theological ideas.

provided contextual solutions to repair the policy problems (Masood and Nisar 2022) created by the central government. This article will analyse three types of institutional work in the regulatory practices of Protestant churches: discursive work, selective implementation, and operational work. In the current analysis, discursive work refers to local bureaucrats' efforts to initiate interpretations to conceal discontinuity and inconsistency in rules and policies and also to construct a rationale for problematising Protestant growth. Selective implementation describes how local bureaucrats selectively implement registration and other religious policies to blur the boundary between the legal and illegal in an effort to maintain Protestant groups' compliance without causing unnecessary turbulence in the local community. Operational work refers to local bureaucrats' "efforts to implement concrete actions [of institutional regulation] affecting the everyday behaviors" (Cloutier et al. 2016: 266) of local Protestant organisations. We discuss how local bureaucrats implement concrete and temporary actions to deal with the limited distribution of church quotas. The entanglement of formal institutionalisation and specific-initiative-oriented operational work charts the space in which bureaucrats can engage in negotiation and flexible acceptance while restricting the growth of Protestant organisations.

Through a close look at the interaction between local state agents and a variety of Protestant churches with distinct institutional statuses in Wenzhou, this article, from the perspective of institutional work, attempts to navigate how local bureaucrats' regulatory endeavours are applied to Protestant organisations to deal with ambiguity, tension, and inconsistency in the institutionalisation of religious regulations. To further existing academic discussions, this article attempts to illustrate three points: firstly, the daily regulatory attentions of local bureaucrats distributed among the diverse Protestant groups are independent of the groups' institutional status. By discursively producing "religious problems," local bureaucrats have persistently set up trials for Protestant organisations to prove their compliance. The "red lines" (*hongxian* 紅線) in the management of Protestant organisations, in this sense, were historically constructed. Secondly, local bureaucrats had practical knowledge about the potential challenges posed by particular Protestant groups that did not coincide with religious regulations prescribed by the higher-level government. However, seemingly poor implementation of these regulations principally echoes the state's ideological imaginary of religious problems. Finally, ambiguity in the religious regulations offered the local government discretionary room to manipulate the visibility of Protestant organisations to balance the conflicting policy directive between constraint and assimilation.

Discursive work obscures the discontinuity of religious policy

Religious policies have changed a good deal in the four decades since the post-socialist reforms, producing discontinuous religious imaginary and correspondent discourses that have significantly shaped the situation of Protestant Christianity in Wenzhou. From "China's Jerusalem" to "Protestant fever" and "unlawful building," discourses have justified the state's tightened regulations on local

churches while disguising the impact of these regulations.

During the first two decades of the reform period, the state's imaginary of modern religion greatly influenced local bureaucrats' policies designed to restore the country's social religious life. In Aoyang County, for example, Protestantism and Catholicism were the only two institutional religions¹⁵ that visibly recovered in the public sphere. State actors favoured Christianity because of its rational organisation and clearly defined boundaries.

According to RAB archives, as a policy focus in the 1980s, bureaucrats sought to build trust and connection between the state and Protestant organisations. To this end they encouraged the unification of previously diffused Protestant house congregations (*jiating juhuidian* 家庭聚會點) into an organised church that would be registered with the TSPM. The local RAB promised to help compliant Protestant groups apply for legally admitted religious venues so that they could attract Protestant followers and compete with disobedient and millenarian house churches.¹⁶ The belief pattern (Xiao 2017) of registered Protestant churches emphasised the construction of tangible space as the expression of their belief, which they distinguished from charismatic and fundamentalist representation of worship. The regime saw this as a sign of "tepid religiosity" (Goossaert and Palmer 2011: 400) that was more compatible with the state's secular ideology than that of other underground Protestant congregations. It also provided leverage to compel Protestant churches to pursue TSPM registration as a means of gaining the privilege of building churches.¹⁷ Bureaucrats in turn compromised local regulations to allow a "fever for church building" (*jian tang re* 建堂熱) among Protestant churches (Ying 2016b; Cao 2017; Xiao 2017). Tolerance was sometimes extended to registered Protestant churches that violated building and zoning codes¹⁸ to build grand churches telegraphing to potential members that they had obtained the state's official acceptance. The sight of religious symbols and imagery on church buildings was considered palatable.

The state's differential policy played a prominent role in shaping the local religious landscape into what became known as "China's Jerusalem," but it pretended otherwise by advancing the narrative that Protestantism was growing because of the spiritual and social support it provided to its followers. In the first decade of the reform, Wenzhou local newspaper and official government documents praised Christian volunteer work and donations to the communities in line with this narrative. In fact, bureaucrats authorised Protestant organisations to reclaim properties seized for purposes such as factories and schools in the Maoist period and freely granted applications for new religious venues. In sharp contrast, in the

15. Some Catholic churches remained underground in the 1980s because of their exclusive loyalty to the Roman Catholic Pope in the Vatican. From the perspective of local bureaucrats, the Catholic population has a relatively slow growth.

16. One example is the "Shouters" (*huhangpai* 呼喊派), a millenarian Protestant sect popular in Wenzhou during the early 1980s. Another type of disobedience was exemplified by the underground churches whose leaders suffered in the Maoist period, and who insisted on their denominational title and refused to join the TSPM (Chow 2021).

17. During our fieldwork in the local RAB, visits to the RAB initiated by local Protestant church leaders were mainly about issues of church building.

18. The violations were related to ambiguous operations in rural land ownership (Xiao 2017).

name of “social ownership,”¹⁹ they prevented Buddhist and Taoist groups from taking back a large portion of their temples. Moreover, the state sharply repressed local communal religions, which they deemed superstitious and backward. According to policy directives from the central government, the recovery and growth of Christianity, a religion with “relevance to the West,” was a symbol of local cosmopolitanism and the city’s openness to Western-style modernity. As a result, Christian churches were highly visible, while houses of worship for other religious groups were not.²⁰ In this sense, the understanding of the local religious landscape as “China’s Jerusalem” was a result of the state’s differential policies towards Christianity and other religions during the first two decades of reform.

However, in the late 2000s,²¹ local bureaucrats became increasingly willing to regulate Protestant churches, as the state decried the rapid growth of Protestant Christianity as a societal disease called Protestant fever. Nowadays, bureaucrats have criticised Protestantism’s polycentric structure and its aggressive “businesslike” mission work. They argue that the lack of a well-organised, vertical authority structure incentivises clergy to develop their own congregations to satisfy their egos.

In one representative example, a RAB bureaucrat argued that Protestant preachers and pastors were over-shepherding (*la yang* 拉羊):

Wenzhou people are good at doing business, and predictably, [the city’s] preachers and pastors also do well in marketing their religious business. They go to spread the gospel everywhere, especially among migrant workers and innocent young students (...). They are overenthusiastic and go out of their way (*chuge* 出格) (...). These preachers distinguish themselves from their colleagues in TSPM and are eager to shepherd more converts as their testimony. (Interview, 9 March 2009)

Whereas in earlier periods bureaucrats downplayed the state’s role in promoting the resurfacing of Protestantism from the underground, today’s narratives of Protestant fever likewise deny the government’s participation in shaping the high profile of Protestantism in the local religious landscape. All that has changed is that they now describe the attributes of Protestant organisations that have led to growth in a negative light, exaggerating the agency and capacity of Protestant churches and the weakness of other religious or cultural organisations.

Furthermore, in light of China’s ascendance as an emerging global power since the late 2000s, Christianity has been the subject of scrutiny. Its allegedly explicit connection with colonial history and Western theological underpinnings makes it suspicious and a threat to the new policy directive of sinicization, although officials are unable to articulate how this nationalist advocacy differs from the Three-Self principles previously in place.

Moreover, the well-structured organisation and clear-cut boundaries of Protestant groups that facilitated absorbing Protestant followers into the post-Mao rational regulatory system are now perceived as a potential threat. Bureaucrats cite these factors as justifications for the need to tighten control over the Protestant

churches. From official archives since the 1980s, we found that local bureaucrats began mandating reports on the total number and annual growth of church membership in order to make local Protestant groups legible in the regulatory system. Ironically, the resulting legibility supports the narrative of the “rapid growth” of Protestantism, which appears stronger because there are no similar statistics for other religions.²² A senior local RAB bureaucrat we interviewed said that based on his extensive experience in dealing with local religious affairs and frequent visits to local religious sites, he did not think that Protestantism is a threat to Chinese society. “After all,” he noted, “unlike other religious groups, Christianity is strictly organised. You do not know what the future holds for it” (interview, 27 March 2009).

The higher-level government’s mandate since the mid-2010s created religious policy aimed at symbolic control of the public face of Protestantism²³ and taming disobedient members.²⁴ Communist bureaucrats began enforcing building and zoning codes that local churches had violated at an unprecedented scale. They demolished unauthorised constructions and removed crosses from the roofs and walls of church buildings. It was an attempt to “restrict [the] public roles and expressions” of Protestantism (Cao 2017: 39). Bureaucrats condemned “unlawful building” to justify this campaign. The problematisation and targeting via “nonreligious modus” (*feizongjiao fangshi* 非宗教方式) established a firm grip on the local Protestant groups.

In this section, we have briefly reviewed the changes in religious policies in post-Mao Wenzhou. Local state agents exercised hegemony over Protestant churches that allowed them to initiate interpretations that concealed the discontinuity and inconsistency of religious policies and that constructed a rationale for problematising Protestant growth as “out of control.” The discursive construction of Protestant fever problematised the growth of Protestant churches

19. According to the religious regulation imposed by the state, since Buddhist and Taoist groups did not have clear memberships like Christianity, their ownership of property was difficult to verify, so local communities retained collective ownership of their temples.

20. Buddhism, Taoism, and communal religions did play a role in local public life in the 1980s and 1990s, but many of them lacked formally acknowledged organisations and space, and generally met in spaces disguised as old-age centres (Wang 2020).

21. In our 2009 fieldwork, we heard gossip from a local bureaucrat that the central government was astonished by a foreign observer’s (Aikman 2003) conclusion: “Christianity is transforming China,” and became alerted to the need to curb the growth of Christianity.

22. Documentation of Buddhist and Taoist followers was largely missing in the local government’s regulatory system due to their unstable membership. Local Buddhists and Taoists we interviewed, however, claim that they have stable affiliation and participation in their organised religious practices.

23. From our observation, the campaign mainly targeted crosses, a significant Christian symbol. In Lucheng District, downtown churches were barred from turning on the lights illuminating the crosses on their roofs at night, even though these were not unlawful structures. In our 2009 fieldwork, we witnessed a negotiation between a local religious regulator and Protestant clergy to discuss the rectification (*zhenggai* 整改) of a new church with an affiliated building and a rooftop cross that exceeded the approved structures. The agreement the two parties finally reached was that the construction of the affiliated building should be stopped and the rooftop cross would be tolerated. This implied that local bureaucrats tolerated the cross as a religious symbol rather than an “unlawful structure” in 2009. The situation changed in 2014, with a policy directive that included an officially sanctioned menu of procedures clearly imposed from the higher-level government.

24. The Protestant clergy who resisted the cross-removal campaign were criticised for maintaining religious privilege.

and populations, and downplayed the role of the state and its discontinuous religious imaginary in shaping the local religious landscape. The legible organisation of Protestantism, which facilitated the state's institutional regulations, is now interpreted as evidence of its potential threat. Protestants' desire for conspicuous church buildings, which bureaucrats used to incentivise their registration in the TSPM system, came under criticism for producing unlawful construction. Ultimately, the categorising of political stances of Protestant groups into compliant versus dissident was dynamically produced along with the discursive construction of religious "problems." As this section suggests, visibility was once a blessing for local Protestant organisations, but in the last decade it has become a curse.

Selective implementation responses to formal regulations

There has been persistent tension in the regulatory practices of Protestant churches. In the 1980s, the local government imposed a vertical authority based on the TSPM and CCC to centrally coordinate Protestant churches. The proposal was that the TSPM would take over responsibility for supervising Protestant activities, and the CCC would be responsible for ecclesiastical affairs such as theological education and ordaining clergy. Meanwhile, several house churches in the vicinity of the same community were required to unify and register with the TSPM as institutionally sanctioned churches. Although this formal structure would facilitate control over a large number of Protestant churches, it did not align with specific local Protestant traditions. Some Protestant clergy, influenced by their denominational traditions,²⁵ refused to join the TSPM and maintained their unregistered status; likewise, some Protestant adherents preferred to gather in small village churches instead of the large churches bureaucrats were encouraging. The state declared that Protestant churches that refused to join the TSPM were illegal, but in practice local bureaucrats have not fully implemented this regulatory system and do not see unregistered churches as a threat to their interests. They have tacitly tolerated the existence of unregistered house churches and gathering spots. Nevertheless, they have maintained control and regulation over Protestant groups in the grey area.

According to the TSPM's investigation, Aoyang County had 158 unregistered churches in 2009, and members of the community and local bureaucrats were well aware of their existence. The RAB bureaucrats had their own rationale for identifying which among these were, in the words of local bureaucrats, "potentially problematic." In the mid-2000s, Mr Wu, a RAB bureaucrat, told us that the RAB had attempted to crack down on some unregistered congregations, and that international media had reported on this as an example of China persecuting Christians. The minister of foreign affairs had responded by sending officials to Wenzhou to investigate the event, and Mr Wu's office was chastised for causing unnecessary social disputes. They therefore decided that they should develop sophisticated thinking before targeting unregistered churches.

We asked Mr Wu how the RAB determined which unregistered churches were politically sensitive, but he did not answer directly.

Rather, he gave us several typical profiles of Protestant adherents: for example, patients suffering from health problems, migrant workers converted by their bosses, and seniors and housewives going to church to kill time or find social support. He said these types were present in both registered and unregistered Protestant churches. This depiction reflected a typical official perspective and Communist understanding of religion, which is that religion has its undeniable existence in the lower level of socialism and is confined to vulnerable or marginal groups. Spreading the gospel to these social categories would thus be considered irrelevant to politics.

House churches organised by economic elites, such as so-called Boss Christians (Chen and Huang 2004), are unlikely to be targeted. We asked a junior RAB bureaucrat about their attitude toward house churches or fellowships organised by Boss Christians. He smiled and said, "They are all successful in their businesses and know how to cooperate with the government. If they have a problem, it is quite simple to send the staff of the tax office to their factories." In other words, Boss Christians are easily managed through threatening them with a tax audit, so their churches really aren't a political threat from the perspective of local bureaucrats. He illustrated the point with a story about a wealthy Christian entrepreneur whose plan to sponsor a concert of Christian hymns at the local gymnasium was regarded as a threat by RAB officials. While their efforts to persuade him that the concert constituted a violation of Article 41 of the Regulations of Religious Affairs were ineffective,²⁶ their report to the local government produced a tax audit, and the concert was not held.

RAB and PSB bureaucrats have policed some unregistered churches, however. Our 2009 fieldwork identified three unregistered house churches or gathering spots in a single neighbourhood of a newly developed urban area in Aoyang County, of which one had received an administrative penalty (*xingzheng chufa* 行政處罰) for having an unauthorised religious venue and was urged to stop its religious activities. This church belonged to a sect known as the New Urban Church. All of the sect's churches are unregistered and recruit their members among young urbanites, especially among the well-educated urban middle-class. Pastor Ying had organised the church, which was baptising new adherents at a rate of about 30 people a year. Local bureaucrats saw this as significant growth and were particularly concerned because of the high percentage of young people in the church.

Ying was the son of the first TSPM chairman and had worked in the TSPM system. He had been expelled from the Three-Self church due to a theological dispute,²⁷ and local bureaucrats understood Ying's desire to compete with the TSPM clergy who had expelled him.²⁸ On the other hand, they objected to Ying's targeting of

25. Though the state attempted to shape Protestantism as one unified post-denominational faith, churches in Wenzhou maintain their denominational traditions respectively among Methodist, Assembly Hall, and Seventh-day Adventist churches.

26. The entrepreneur refused to give up the concert and insisted it was a musical event, not a religious activity.

27. The issue was that his adoption of Reformed theology and the belief that "once saved, always saved" was not tolerated in the local TSPM system.

28. Local bureaucrats attributed the rapid growth of Ying's church to his desire to compete with the TSPM and illustrate the popularity of his theological ideas to the young, well-educated generation.

young and well-educated urbanites.²⁹ Pastor Ying told us that he was willing to register his church with the RAB³⁰ as a show of political compliance. Two months after the RAB shut down Ying's church, he reorganised in the same location. The RAB bureaucrats did not initiate a second aggressive action toward this reorganised congregation, but they warned that they would if Pastor Ying maintained his "aggressive" mission work. The police officer from the local PSB explained to us that enforcing tough regulations continuously may lead to unintended consequences, such as Protestant groups joining together in an aggressive action against the state instead of concentrating on competing among themselves. "You know, so-called suffering will bring an aura to the Christians," the PSB police officer told us. Our interviews suggest that the two other unregistered churches in the neighbourhood had interpreted the crackdown on Ying's church as a warning. They redoubled efforts to maintain a low profile in order to avoid drawing the attention of local bureaucrats, which Ying had failed to do.

In some sense, by enforcing institutional codes on less obedient churches, the local bureaucrats initiated a negotiation with the targeted churches. If the churches showed their willingness to adapt to the regulations, more or less, local bureaucrats conceived of them as being basically compliant. Moreover, applying regulations to the targeted churches would intensify the self-discipline of all the rest.

Registered churches could also draw negative attention and unwanted regulation – such as by "crossing the line" to reach out to minors, college students, and political and cultural elites.³¹ In the early 2000s, many local churches offered Sunday schools and summer camps for children. Local bureaucrats initiated restrictive actions to stop these Sunday schools and summer camps, accusing churches of encroaching on the state's school system. While our observations at that time suggested that the Sunday schools were disbanded, we did find on revisiting our field sites in the late 2000s that some churches were providing care services for young children that did not offer religious education. Later we learned that they were doing so with the full knowledge of local RAB bureaucrats, who considered it inevitable that adult Christian parents or grandparents would want such care for their young kids during Sunday services. A RAB bureaucrat told us that tolerating this care provision in religious venues facilitated government oversight. "Otherwise, if they rented a private house for Sunday school, it would be totally out of our reach."

In this section, we have described the selective implementation of religious regulation. While officials used the TSPM regulatory system against unregistered churches they considered a threat, targeting was based on local bureaucrats' practical knowledge to conceptualise the political potentiality of local churches from diverse backgrounds. Selectively implementing regulations was a realistic choice for local bureaucrats in a resource-scarce environment whose capacity for management and monitoring was limited. It also allowed them to maintain compliance among Protestant churches without enforcing extensive and persistent regulations, since targeting some churches would intensify self-discipline among the rest. Local bureaucrats' statements about why they singled out specific churches or religious activities indicated that their selection complied principally with the state's ideological

imaginary of religious problems, such as mission work to the young generations and rapid expansion.

Operation work with ambiguity in institutional regulations

One workday in 2009, we visited the TSPM office and found a group of elders and clergy of unregistered house churches from all over the county. They were seeking an opportunity to apply for legal status. We asked them why they desired to be assimilated into the TSPM system after years of independence. Indeed, among them was a pastor we had known in 2003 and who had told us that his church had deliberately resisted TSPM registration to avoid frequent interference from the local government. Six years later, he explained to us that his church had become aware of the need to cooperate with the TSPM and receive institutional status to maintain their religious space in their village. He said:

Our church, although without legal registration, is known and tolerated by the government (...). Due to village renewal, the cadre of our village committee told us that the land we had rented [as a gathering spot] would be taken back to build a residential compound for the villagers (...). We paid money to the village committee in exchange for the land several years ago (...). However, our operations are not that formal and we have no land certificate (...). No one had predicted that the situation would go this way (...). Our fellow villagers who practise idol worship pointed out that we were illegal (...). So, brothers and sisters in our church asked me to go to the TSPM to apply for registration. We could become formal by receiving legal status, and in this way, [retain control of the land we have been using]. (Interview, 20 July 2009)

There had been a shift wherein the church once saw TSPM registration as a potential source of government interference, but now saw it as a means of obtaining protection from interference at the village level.

We do not know what the outcome of the appeal for registration was at the time, but the churches were facing an obstacle in that the central state restricts the total quota of registered religious organisations in order to curb the growth of religion. Anthropologist Mayfair Yang (2004: 744) learned during her fieldwork in Wenzhou in the 1990s that registration would not be available to new applicants after 1994. The local RAB and TSPM in Wenzhou told us the same thing.

How to accept and manage previously unregistered Protestant groups while sticking to the controlled quota for registered churches creates a dilemma for local religious regulators. As the head of the local RAB, Mr Zhao, told us in 2009:

29. These types of Protestant converts, in the view of local bureaucrats, will have a significant sociocultural impact.

30. The rhetoric of "registration with the RAB" showed Ying's willingness to flexibly adapt to the regulatory system, even though acquiring formal status was impossible.

31. Recently, Communist Party members and school teachers have been required to sign a document declaring that they have no religious beliefs (data from our fieldwork in 2022).

To do religious regulation work, we should abide by both the laws [which refer to freedom of religious belief] and the policies [which call for restraining the growth of religion]. But we are confused at times: some regulatory issues would be acceptable in legal terms but not in terms of policies. Which rules should we follow? (Interview, 20 December 2009)

What constitutes “excessive” development of Protestant Christianity is unclear. Although Mayfair Yang was informed that the state would prohibit new registration of religious organisations in the mid-1990s, several communities in Wenzhou witnessed the emergence of new church buildings in the mid-2000s. The state has promoted institutionalisation attempts to increase the legibility of religious groups, such as by enacting formal management of previously unregistered Protestant groups.³² This has created a tension between legibility and visibility.

This dilemma was manifest in local bureaucrats’ approach to independent church groups that were seeking TSPM registration. Generally, adherents of these unregistered churches would not join large Three-Self churches, and the churches sought institutional status without completely sacrificing their independence. RAB bureaucrats offered applicants the option of applying for institutional status as a “church” or to apply for the more flexible identification as a “gathering spot.” Protestant organisations applying for the “church” registration with the intention of constructing legally accepted church buildings need the approval of both the Provincial Department of Land and of the Provincial Department of Housing and Urban-rural Development for their use of land for church construction. Further, prefecture-level governments approve “gathering spots” while the provincial government approves “churches,” and a RAB bureaucrat told us that the prefecture-level government was far more inclined to approve applications. In terms of the new regulative Measure for the “Approval for and Administration of Temporary Places for Religious Activities” (*“zongjiao linshi huodong didian shenpi guanli banfa” de tongzhi* “宗教臨時活動地點審批管理辦法”的通知) in 2018, Protestant groups without formal status can apply to the local RAB for status as a “temporary religious congregation site.” The “gathering spot” designation had become so accepted that the local government not only encouraged new applicants to apply for the status of “gathering spots,” but also changed the status of previously sanctioned “churches” to “gathering spots.”

Clergy opposed local bureaucrats’ amplification of the “gathering spot” designation vociferously, and they appealed to TSPM to argue against what they saw as a degradation of their organisations. Local RAB bureaucrats were dismissive, pointing out that the only privileges afforded to churches over gathering spots are such that small Protestant organisations would not want to take advantage of them in any case, such as holding large-scale religious activities and publishing brochures for members. The officials also argued that the “gathering spot” designation would entail less assessment and monitoring from higher-level government. However, clergy saw the designation as a warning sign that they would not be allowed to grow significantly and that they would get shut down if they tried, so in their view, their churches were in a precarious spot.

To some extent, central government actors rely on the official number of registered churches and symbolism such as rooftop crosses to perceive whether Protestant Christianity is growing excessively and thus whether bureaucrats are fulfilling their obligation to prevent such excess. Without violating the Constitution of 1982, which promises to protect individuals’ freedom of religious belief, the state cannot directly bar adults from becoming Christians, except for Communist Party members or some professionals such as school teachers. As for local RAB bureaucrats, they demonstrate to the central government that they are controlling Protestant “over-expansion” by reporting stable or even decreased numbers of churches. Manipulating the “church” designation would make the growth of Protestant organisations “invisible.” In some sense, this can be understood as a symbolic operation in the seemingly rational regulatory system.

Nonetheless, the RAB bureaucrats continue to employ measures to exert control over Protestant Christianity. To discourage the expansion of Protestant churches, the local RAB bureaucrats declare that a “reasonable allocation” of churches have been confirmed, and that on principle they will not approve applications by local Christians for church construction permits, although what is meant by “reasonable” remains unclarified. At the same time, they have not ruled out the possibility of building officially approved religious venues, which incentivises Protestant groups’ affiliation with the TSPM. After two years of lobbying the higher government, the TSPM declared that they had finally managed to obtain a new quota for religious venues in Aoyang’s new urban area approved in the late 2000s. TSPM clergy and local RAB bureaucrats presented this in a positive light. Churches thus exist with the understanding that opportunities may arise in the future, and that any conduct that displeases regulators may be punished with the denial of opportunities that nevertheless may never come.

Some house church leaders have considered never applying for institutional status. A clergyman of an unregistered church told a TSPM pastor in our hearing that he did not think there was any need for TSPM registration, and further that he thought rising land values would prevent his church from ever being granted land for building. His church was renting a workshop in a factory owned by a Boss Christian.

The TSPM pastor urged the clergyman to think about the future:

For now, things will be fine as long as you can handle the relationship with local cadres and others in the neighbourhood. But in the long run, you’d better apply for registration (...). One sure bet for the future is that registration will become more difficult and complicated. It’s been a general tendency – not only in religious regulations but also in other aspects of social life. The procedure will become more standardised and formal, and the government will not make any concessions. (Data collected on 18 January 2010)

32. To enact formal management of these previously unregistered churches, local bureaucrats may grant them quasi-formal status (such as affiliation with registered churches, or later the title of “temporary religious congregation site”), which is only valid within the county.

Local RAB bureaucrats expressed similar opinions about the utility of registering promptly. Intensified tension between unregistered churches and their communities (or neighbourhoods) in the 2010s³³ led them to turn to officially recognised status for certainty and security. But recent campaigns have targeted registered churches in the name of “unlawful buildings,” which implies that the advantages of registration may decrease in the future.

Echoing the central government’s ambiguous and self-contradictory policy directives, local bureaucrats are expected to restrict the growth of Protestant organisations on the one hand, while on the other hand they set out to persuade more house churches to become affiliated, formally or informally, with the TSPM, which would improve their capacity for monitoring. Thus, the daily administrative practices of local regulators (including local bureaucrats of the RAB and TSPM) would warrant balancing the conflicting intentions between constraint and assimilation. In order to meet the higher-level government’s expectations of curbing Protestant growth, local bureaucrats manipulate the number of “churches” they report to the higher-level government, which is also a symbolic operation in the seemingly rational regulatory system. While RAB bureaucrats laid out the advantages of institutional status and proposed the status of “gathering spot” or “temporary religious congregation site” as flexible and advantageous, Protestant groups rightly felt this did little to clarify ambiguities in the regulatory system or eliminate the risk they faced of exposure to future campaign governance.

Conclusion

Although scholars have explored the regulatory governance of Christianity as a local game, little attention has been paid to the ambiguity, tension, and inconsistency of the religious policies imposed by the central government and its challenges to the regulatory practices of local bureaucrats. This article has attempted to fill this void and show how local bureaucrats have provided contextual solutions to repair the policy problems instituted by the central government. With insight into institutional work (e.g., discursive work, selective implementation, and operational work), we draw four major conclusions.

Firstly, discursive work illustrates how local bureaucrats exercise hegemonic power in the regulation of Protestant churches. They have used this power to initiate interpretations of religious policies in order to conceal their discontinuity and inconsistency and also to construct a rationale for problematising Protestant growth “beyond control” from the perspective of higher-level government. By discursively producing “religious problems” and “red lines,” local bureaucrats have persistently set up trials for Protestant groups to prove compliance. In some sense, a seemingly sophisticated institutionalisation of religious regulations, though poorly implemented today, could be mobilised for future governance of “uncontrolled” expansion.

Secondly, selective implementation is the realistic choice of local bureaucrats based on their resource-scarce environment. By their practical knowledge of how to conceptualise the political

potentiality, local bureaucrats’ statements about why they single out specific churches or misconduct indicate that their selection complies principally with the state’s ideological imaginary of “religious problems.” The Protestant organisations that the local bureaucrats target for selective implementation intensify the self-discipline of Protestant groups in general.

Thirdly, through operational work, local bureaucrats have balanced the central government’s conflicting intentions of constraint and assimilation. They have enjoyed discretionary room to manipulate the number of institutionally categorised “churches” reported to the higher-level government, while at the same time convincing independent churches of the certainty and security provided by institutional status and encouraging them to flexibly adapt to the system.

Finally, visibility, in a physical and metaphorical sense,³⁴ has become entangled with contradictions in religious regulations and the distance between central and local government priorities. The state has persistently produced the dichotomy of the inclusive and the exclusive by extensively enforcing regulations and policies, and visibility could be a reward or a curse for local Protestant organisations. Frontline bureaucrats can manipulate numbers and visual signs to obscure Protestant growth, but they cannot eliminate the risk Protestant organisations face through exposure to future campaign governance.

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33. The intensified land competition and conflicts between Christianity and communal religions that have been officially accepted as “religion” were interpreted as the necessity of institutional status for previous independent Protestant groups.

34. Visibility means Protestants physically express their belief in the local community via visually impressive church buildings or rooftop crosses, and it also refers to the act of their registration, sharing information (such as population, clerics) with the government. Or, within the bureaucracy, local bureaucrats reporting the number of different categories of Protestant organisations to their high-level government is another way of creating visibility.

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