



CADERNOS DE DEREITO ACTUAL

www.cadernosdedereitoactual.es

© **Cadernos de Direito Actual** Nº 30. Núm. Ordinario (2025), pp. 153-177

·ISSN 2340-860X - ·ISSNe 2386-5229

Research on the legal issues of administrative penalty power of townships in China based on Article 24 of the administrative penalty law of the People's Republic of China

Chaoying Yu¹

Universiti Teknologi MARA

Yichun University

Norazlina Abdul Aziz^{2,*}

Universiti Teknologi MARA

Summary: 1. Introduction. 2. Related concepts and theories. 2.1. Definition of concepts. 2.2. Relevant theories. 2.2.1. Administrative law theory. 2.2.2. Governance theory. 3. Research methods. 4. Empowerment of townships with administrative penalty power. 4.1. Legal provisions on the delegation of the administrative penalties power. 4.2. Practice of empowering townships with penalty power. 5. Current status and dilemmas of the townships exercise the penalty power. 5.1. Legal deficiencies in the empowerment system affect the legitimacy of law enforcement. 5.1.1. Ambiguity in legal provisions. 5.1.2. Insufficient empowerment effectiveness of normative documents. 5.1.3. "One-size-fits-all" approach to the transfer of administrative penalty powers. 5.2. Prominent institutional and mechanism issues restricting grassroots law enforcement efficiency. 5.2.1. Uneven allocation of grassroots administrative law enforcement resources. 5.2.2. Insufficient professionalism of township-level administrative law enforcement entities. 5.2.3. Poor development of coordination mechanisms for township-level administrative law enforcement. 5.3. Poor supervision mechanisms undermine the credibility of grassroots law enforcement. 5.3.1. Inadequate external supervision leads to prominent arbitrariness in law

¹ Ph.D candidate, Faculty of Law, Universiti Teknologi MARA, Kuala Lumpur, Malaysia; Lecturer, Faculty of Marxism, Yichun University, Jiangxi, China. ORCID: <https://orcid.org/0009-0008-8891-1445>. E-mail: yuchaoying0510@gmail.com

² Dr/ Professor, Faculty of Law, Universiti Teknologi MARA, Kuala Lumpur, Malaysia. ORCID: <https://orcid.org/0000-0002-8892-1263>. E-mail: noraz397@uitm.edu.my. (corresponding author).

enforcement. 5.3.2. Incomplete internal accountability makes responsibility investigation difficult. 5.3.3. Poor cooperation among multiple subjects affects rights protection. 6. Countermeasures and suggestions for improving the exercise of administrative penalty powers by townships. 6.1. Improve legal guarantees for the delegation of administrative penalty powers. 6.1.1. refine the provisions of article 24 of the administrative penalty law. 6.1.2. Enhance the standardization of legal empowerment. 6.1.3. Optimize the allocation of powers and responsibilities for penalty powers. 6.2. Establish a hierarchical and classified operation mechanism for administrative penalty powers. 6.2.1. Explore differentiated implementation of administrative penalty powers. 6.2.2. Establish a trinity model for the operation of administrative penalty powers. 6.2.3. Establish a linkage mechanism for administrative penalty powers. 6.3. Enhance the professionalization level of township-level administrative law enforcement. 6.3.1. Improve grassroots legal personnel allocation and financial guarantee. 6.3.2. Strengthen the professionalization of grassroots law enforcement teams. 6.3.3. Promote law enforcement resource sharing and technological empowerment. 6.4. Reshape the supervision system for township-level administrative law enforcement. 6.4.1. Strengthen external supervision of the administrative system. 6.4.2. Implement internal supervision of the administrative system. 6.4.3. Foster a pattern of multi-subject co-governance at the grassroots level. 7. Conclusion. 8. Reference.

Abstract: The administrative penalty power of Chinese townships is undergoing a dynamic reform process from legal empowerment to practical adjustment. Article 24 of the Administrative Penalty Law revised in 2021 establishes the legal framework for provincial governments to delegate administrative penalty authority, providing a system foundation for the downward shift of the law enforcement focus. However, the legislative provisions are rather vague, and multiple obstacles have been encountered in specific practical implementation, such as insufficient empowerment effectiveness, shortage of law enforcement resources, poor coordination in law enforcement, lack of professional law enforcement personnel, and imperfect supervision mechanisms, which have seriously affected the law enforcement efficiency and weakened the credibility of township law enforcement. To thoroughly analyze the causes of the aforementioned problems and explore paths to resolve these dilemmas, this study comprehensively adopts methods such as data statistics, textual analysis, and field research to measure the relevant indicators of the administrative law enforcement powers of township people's governments. Meanwhile, it conducts differentiated analyses from multiple dimensions including law enforcement support, case-handling quality, and law enforcement effectiveness, so as to ensure the objectivity and validity of the research findings. Finally, the researcher intends to propose relevant countermeasures from aspects such as improving the legal system, constructing a refined administrative penalty power operation mechanism, enhancing the law enforcement capacity and level of townships, and reshaping the law enforcement supervision system, providing theoretical support and practical suggestions for improving the administrative law enforcement system at the grassroots level in China.

Keywords: Administrative Penalty Power, Township Governments, Devolution of Power, Power Allocation

1. Introduction

The delegation of administrative penalty power to township governments is an important practice in the modernization of grassroots governance. Article 24 of the Administrative Penalty Law, revised in 2021, explicitly grants provincial-level governments the authority to entrust administrative fine powers. It clarifies the

legitimacy of townships and towns undertaking penalty powers in the form of law, endows the supervisory responsibilities of townships and towns with corresponding law enforcement power support, puts an end to the unbalanced situation of "limited powers but heavy responsibilities, and having responsibilities without corresponding powers" at the grassroots level, provides a clear legal basis for law enforcement in townships and towns, fills the legal gap in grassroots law enforcement, and promotes the downward shift of the focus of law enforcement and the improvement of law enforcement efficiency. However, the legislation only offers a general description, and in the actual operation, it faces multiple challenges.

Firstly, the empowerment system has legal flaws, affecting the legitimacy of law enforcement. The Administrative Penalty Law does not specify the detailed steps and requirements for the delegation of penalty power. Most provinces have not conducted comprehensive evaluations and screenings of the townships to which the power is to be delegated. The scope of the delegated power and the conditions for undertaking it are not clearly defined in the law. There are no standards or operational assessment methods provided for what constitutes "urgent need" and "effective undertaking".³ When formulating supporting regulations, there is a large degree of discretionary space.

Secondly, the institutional and mechanism issues are prominent, restricting the efficiency of grassroots law enforcement. The distribution of grassroots administrative law enforcement resources is uneven. The delegation of penalty power has not been accompanied by sufficient material and logistical support. The professional level of law enforcement personnel is seriously inadequate, and there are frequent problems of improper application of the law and non-compliance with procedures during the law enforcement process. The construction of law enforcement coordination mechanisms is not smooth, and there is a lack of substantive coordination among departments, with low cooperation levels, still showing a situation of each doing their own thing.⁴

Finally, the supervision mechanism is not perfect, and the credibility of grassroots law enforcement is low. The external supervision system for grassroots administrative law enforcement has not been fully established, and grassroots law enforcement mainly relies on the review and guidance of the superior government. Internal accountability mechanisms generally suffer from incomplete systems, opaque procedures, and insufficient enforcement, making it difficult to implement responsibility pursuit and lacking effective internal constraints on law enforcement behavior.⁵ The supervisory role of the public and residents' self-governance has not been fully exerted, and they have not been fully involved in the law enforcement process and the supervision of administrative penalties.

In conclusion, due to the ambiguity of legal provisions, the shortage of law enforcement resources, and the imperfection of the supervision mechanism, the operation of the administrative penalty power in Chinese townships is not smooth, leading to a series of adverse consequences. It not only affects the efficiency of law enforcement but also causes the "empty rotation" of grassroots law enforcement, making it difficult to effectively implement supervision and resulting in law enforcement loopholes. The governance order in townships has become chaotic, with frequent problems of duplicate law enforcement or shirking of supervision responsibilities. Currently, also unable to solve the dilemma of "seeing but not being able to manage". This not only affects the rights and interests of the people but also

³ Guohua, J., & Zhongyuan, S. (2022). Research on the Legal Nature of the Devolution of Law Enforcement Power to Townships and Sub-Districts. *China Legal Sci.*, 10, 3.

⁴ Qi, H. (2023). A brief analysis of the theoretical logic and system operation of the downward shift of administrative law enforcement power. *Advances in Education, Humanities and Social Science Research*, 5(1), 373-373. <https://doi.org/10.56028/aehssr.5.1.373.2023>

⁵ Zhang, C., Pei, L. (2024). Research on the Chinese Government's Administrative Law Enforcement Supervision Issues in the Chinese Government. *Advances in Economics and Management Research*, 9(1), 23-23. <https://doi.org/10.56028/aemr.9.1.23.2024>

weakens the credibility of the grassroots government and hinders the modernization of grassroots governance.

2. Related concepts and theories

2.1. Definition of concepts

According to the provisions of Article 8 of the 1996 version of the *Law of the People's Republic of China on Administrative Penalties*, administrative penalties are defined as measures imposed on citizens, legal persons, or other organizations that violate administrative management order, and usually include forms such as warnings, fines, and confiscation of property. However, this definition does not provide a detailed legal interpretation of the concept of "administrative penalties".⁶ It was not until the revision of the *Administrative Penalty Law* in 2021 that we could formally derive the concept of administrative penalty power: "Administrative penalty refers to the punishment imposed by administrative organs in accordance with the law on citizens, legal persons, or other organizations that violate the administrative management order, by means of impairing their rights and interests or increasing their obligations."⁷ This revision means that the concept of administrative penalty has obtained a clearer legal definition.

The connotation of the administrative penalty power of Townships has been redefined against the background of the devolution of law enforcement power. Article 24, Paragraph 1 of the revised Administrative Penalty Law stipulates: "People's governments of provinces, autonomous regions, and municipalities directly under the Central Government may, in light of local actual conditions, decide to delegate the administrative penalty powers of the competent departments of county-level people's governments that are urgently needed for grassroots management to township-level people's governments capable of effectively undertaking such powers, and shall organize regular evaluations." Paragraph 2 provides that township-level people's governments undertaking the administrative penalty powers shall implement administrative penalties in accordance with the law within the prescribed scope. Paragraph 3 states that the relevant local people's governments and their competent departments shall strengthen organizational coordination, professional guidance, and law enforcement supervision, establish and improve a coordination and cooperation mechanism for administrative penalties, and improve the evaluation and assessment system. The article stipulates that "provinces, autonomous regions, and municipalities directly under the Central Government may decide to transfer the administrative penalty power of the departments of county-level people's governments to township and town people's governments for exercise." This provision legally endows township and town governments with administrative penalty power, marking a transfer of the subject of administrative authority. This signifies an integration of government functions and also represents a systematic shift of the focus of law enforcement to the grassroots. In the past, Townships were unable to conduct law enforcement in their own name; now, they can directly exercise penalty power, thus assuming a more proactive and independent role. Compared with county-level administrative organs, township and town governments are at the

⁶ Cai, D. (1996). Introduction to the administrative penalty law of China. *Colum. J. Asian L.*, 10, 259.

⁷ The National People's Congress. Article 2 of the Law of the People's Republic of China on Administrative Penalty (Revised in 2021). Announcement Date: January 22, 2021, Effective Date: July 15, 2021. Available at: <https://flk.npc.gov.cn/detail?id=ff8080817703add20177373df6a43e33&fileId=&type=&title=%E4%B8%AD%E5%8D%8E%E4%BA%BA%E6%B0%91%E5%85%B1%E5%92%8C%E5%9B%BD%E8%A1%8C%E6%94%BF%E5%A4%84%E7%BD%9A%E6%B3%95> (access on 26 July 2025).

grassroots level, enabling them to respond more promptly and quickly to the actual needs of the grassroots people, resolve administrative matters and disputes, and improve the efficiency of administrative management.

2.2. Relevant theories

2.2.1. Administrative law theory

Dan Corry advocates for the localization of administrative power. He argues that within the framework of national minimum standards and policy priorities, power and resources should be devolved to frontline local managers, democratic entities, consumers, and community residents—not only to local governments but also to every citizen. At the same time, he emphasizes that local governments should serve as tools to guide the political, economic, and social development of communities, rather than merely acting as public service providers.⁸

Gerry Stoker also proposes the implementation of decentralization within the framework of national policy priorities to build a multi-level governance model. He further contends that the complexity of local issues requires a broader definition of "the local" and the participation of multiple stakeholders.⁹

Vincent Ostrom believes that localities should possess the power of self-governance, supports the localization of administrative power, and promotes greater autonomy for localities in areas such as public resource management and public service provision.¹⁰

David Wilson and Chris Game also advocate for the devolution of management power, emphasizing the "freedom and flexibility" of local authorities to provide public services based on local actual needs.¹¹

Otto Mayer, the founder of German administrative law, proposed the principle of legal reservation, emphasizing the prior reservation of law, which means that administrative acts must be based on legal authorization and that administrative organs are prohibited from creating powers on their own.¹² This theory is highly consistent with the rule of law principle in China's township-level law enforcement, which states that "administrative organs must perform their legally prescribed duties and must not act without legal authorization." Hartmut Maurer further developed the principle of legal reservation, arguing that the legality of administrative acts must satisfy both formal legality (legal authorization) and substantive legality (legitimate purpose).¹³ The theory of procedural justice he proposed centers on legality,

⁸ Corry, D., & Stoker, G. (2002). New Localism: refashioning the centre-local relationship. The New Local Government Network (NLGN). Available at: <http://eprints.soton.ac.uk/id/eprint/47391> (access on 26 July 2025).

⁹ Stoker, G. (1991). The politics of local government. Bloomsbury Publishing. Available at: https://books.google.de/books?hl=en&lr=&id=uZBKEAAQBAJ&oi=fnd&pg=PR11&dq=The+Politics+of+Local+Government&ots=_s6ZXsxEj2&sig=FnnqJXE7qtB3tWmYhfS9sLtVTzM&redir_esc=y#v=onepage&q=The%20Politics%20of%20Local%20Government&f=false (access on 26 July 2025).

¹⁰ Ostrom, V. (1999). Polycentricity (part 1). Polycentricity and local public economies, 52-74. Available at: https://books.google.de/books?hl=en&lr=&id=iBZ32c7KLWUC&oi=fnd&pg=PA52&dq=Vincent+Ostrom&ots=fdEsv5XzgI&sig=suNNOuaK-GQtePn4jVaBCFQsCPk&redir_esc=y#v=onepage&q=Vincent%20Ostrom&f=false (access on 26 July 2025).

¹¹ Kenny, G. K., Wilson, D. C. (1984). The interdepartmental influence of managers: Individual and sub-unit perspectives. *Journal of Management Studies*, 21(4), 409-425. <https://doi.org/10.1111/j.1467-6486.1984.tb00236.x>

¹² Schmidt-De Caluwe, R. (1999). Der Verwaltungsakt in der Lehre Otto Mayers: staatsrechtliche Grundlagen, dogmatische Ausgestaltung und deren verfassungsbedingte Vergänglichkeit (Vol. 38). Mohr Siebeck.

¹³ Maurer, H., Waldhoff, C. (2006). *Allgemeines Verwaltungsrecht* (Vol. 16). München: CH Beck.

participation, and transparency. It emphasizes that administrative procedures are not only a tool to achieve substantive justice, but also an independent value system for protecting citizens' rights and enhancing administrative credibility. In Administrative Law, William Wade pointed out that administrative penalties must comply with the principles of "hearing the opinions of the other party" and "avoiding bias"; if township-level law enforcement violates these procedures, the court may issue a "writ of certiorari" to revoke the penalty.¹⁴ Through this principle, "arbitrary law enforcement" or "law enforcement beyond the scope" in grassroots law enforcement can be prevented. It also clarifies the responsibilities and authorities among authorities at all levels, avoiding buck-passing and disputes between different levels regarding specific matters.

The adaptive administration theory proposed by scholar Jurgen Wolfrum centers on "dynamic adjustment" and "flexible governance". It advocates that administrative power should be flexibly adjusted within the legal framework according to social needs, technological changes, and governance contexts to achieve a balance between legality and effectiveness.¹⁵ Ernst Forsthoff argued that administrative acts should balance efficiency and humanistic care. He believed that administrative work should not only maintain administrative flexibility but also reflect respect for the rights of the counterparties. Administration needs to achieve the efficient provision of public services at the lowest cost, and at the same time, it is also necessary to avoid excessive infringement on citizens' rights and interests caused by rigid law enforcement.¹⁶ This concept provides theoretical guidance for China's township-level law enforcement. As China advances the process of comprehensively governing the country according to the law, enhancing administrative efficiency, safeguarding the rights of counterparties, and striving to achieve a dynamic balance of "efficient law enforcement without overstepping boundaries and adequate protection of rights" have become one of the core components of China's efforts to build a law-based government.

2.2.2. Governance theory

Elinor Ostrom, an American scholar, proposed the theory of polycentric governance, which emphasizes the collaboration among multiple subjects including the government, the market, and society.¹⁷ Rolf Stauder, a German scholar, argues that cooperative administration can achieve resource integration through forms such as "administrative agreements" and "joint law enforcement".¹⁸ Jody Freeman advocates the theory of collaborative governance, arguing that the government should establish a collaborative network with social entities to jointly address complex governance issues.¹⁹ Township-level law enforcement needs to shift from "one-way control" to "multi-stakeholder co-governance" and establish a closed loop of "law enforcement-negotiation-supervision". Robert Dahl advocates pluralist democracy and citizen participation, and he proposes that democratic governance should be

¹⁴ Wade, W., & Forsyth, C. F. (2014). Administrative law. Oxford University Press, USA.

¹⁵ Hestermeyer, H. P., König, D., Matz-Lück, N., Röben, V., Seibert-Fohr, A., Stoll, P. T., & Vöneky, S. (2011). Coexistence, Cooperation and Solidarity (2 vols.): Liber Amicorum Rüdiger Wolfrum. Martinus Nijhoff Publishers.

¹⁶ Mannori, L., Sordi, B. (2009). Science of administration and administrative law. In A Treatise of Legal Philosophy and General Jurisprudence: Vol. 9: A History of the Philosophy of Law in the Civil Law World, 1600-1900; Vol. 10: The Philosophers' Philosophy of Law from the Seventeenth Century to our Days (pp. 225-261). Dordrecht: Springer Netherlands.. https://doi.org/10.1007/978-90-481-2964-5_6

¹⁷ Ostrom, E. (2009). Understanding institutional diversity. Princeton university press.

¹⁸ Wedde, H. F., Lischka, M. (2003). Cooperative role-based administration. In Proceedings of the eighth ACM symposium on Access control models and technologies. (pp. 21-32).

¹⁹ Freeman, J. (1997). Collaborative governance in the administrative state. UCLA L. Rev., 45, 1.

achieved through the negotiation and competition of diverse interest groups.²⁰ A multi-stakeholder participation mechanism should be established in township-level law enforcement to avoid power monopoly. Wu Huan, a Chinese scholar, proposes that a collaborative mechanism for township-level penalty power needs to be constructed to break through the single government-led model.²¹ Townships need to integrate the strengths of different departments, social organizations, and the public to form a strong joint force for law enforcement and inject more resources into resolving law enforcement difficulties.

Philip Selznick and Philip Nonet proposed the theory of responsive law in their 1978 co-authored book *Law and Society in Transition: Toward Responsive Law*.²² This theory originated in the field of law and later gradually expanded to the field of public governance, forming a systematic governance paradigm. The theory holds that law should go beyond formalized rules and proactively respond to social needs and value goals. It emphasizes problem-centeredness and goal orientation, and through holistic collaborative governance and technology-empowered governance, it flexibly and dynamically addresses interest conflicts and responsibility allocation among multiple subjects, solves practical grassroots problems, and improves the quality of public services and governance capabilities. Susan Rose-Ackerman has provided a systematic solution to address the corruption risks in the operation of township-level administrative penalty power by constructing a three-dimensional framework of "power restriction-incentive compatibility-technology empowerment". Its core logic lies in: reducing corruption incentives through institutional design, enhancing supervision effectiveness through technical means, and reshaping law enforcement ethics through cultural adaptation.²³

3. Research methods

The researchers will conduct the study using a multi-method approach, with core methodologies including legal dogmatics, regulatory compilation and analysis, and comparative analysis.

Firstly, focusing on Article 24 of the Administrative Penalty Law, and integrating it with higher-level laws such as the Constitution and the Organic Law of Local People's Governments, the study will analyze the legal nature, subject qualification, and operational boundaries of administrative penalty powers at the township level. It will clarify the interpretation logic and application rules of legal norms, and establish a solid jurisprudential framework for the research.

Secondly, the study will systematically collect relevant decisions, lists, and implementation rules formulated by various provinces in accordance with the Administrative Penalty Law. It will focus on analyzing core provisions such as the scope of delegated powers, undertaking conditions, and evaluation mechanisms in different regions, and summarize the local characteristics, common issues, and practical differences in the process of power devolution.

Thirdly, the study will compare the practical models of regions with different development levels in China, analyzing aspects such as their law enforcement capabilities, procedural standards, and supervision effectiveness, so as to identify the dilemmas in practical implementation.

²⁰ Dahl, R. A. (1956). A preface to democratic theory (Vol. 115). University of Chicago Press.

²¹ Wu Huan & Xia Ying. (2025). Vertical and Horizontal Allocation of Relatively Concentrated Administrative Penalty Power and Its Limitations. *Journal of Harbin Institute of Technology (Social Sciences Edition)*, 27(03), 26-32. <https://doi.org/10.16822/j.cnki.hitskb.2025.03.003>

²² Nonet, P., Selznick, P., & Kagan, R.A. (2001). *Law and Society in Transition: Toward Responsive Law* (1st ed.). Routledge. P18. <https://doi.org/10.4324/9780203787540>

²³ Rose-Ackerman, S., & Palifka, B. J. (2016). *Corruption and government: Causes, consequences, and reform*. Cambridge university press.

4. Empowerment of townships with administrative penalty power

4.1. Legal provisions on the delegation of the administrative penalties power

Since China's reform and opening up in 1978, local governments have played an increasingly important role in governance. As a key tool for administrative management, administrative penalty has also received growing attention. Initially, administrative penalties were the responsibility of law-enforcement-capable organs under local people's governments at or above the county level where illegal acts occurred. Unless explicitly stipulated otherwise by laws or administrative regulations, township and town people's governments did not directly possess administrative penalty power.

In 2016, the Guiding Opinions of the General Office of the Communist Party of China Central Committee and the General Office of the State Council on Further Promoting the Reform of the Administrative Management System in Economically Developed Towns clearly stated that economically developed Townships are allowed to undertake part of the administrative examination and approval and administrative penalty powers of county-level governments based on actual needs.

The revision of the Administrative Penalty Law in 2021 formally clarified that provincial-level governments have the right to delegate part of the administrative penalty powers of county-level government departments to Townships. This provides an explicit institutional basis in law for Townships to become independent law-enforcement entities. Township and town people's governments are no longer merely passive executors of superior orders, but have become active entities capable of independently exercising certain administrative penalty powers. However, the law does not directly confer administrative penalty power on township and town governments; instead, it provides a power-establishing rule through which they can obtain such power. The law stipulates qualification requirements for the subjects exercising the power of administrative penalties. Specifying that only township and town people's governments that meet the corresponding conditions can effectively undertake this function. It reflects the rigid constraints of the principle of legal reservation in administrative law theory. At this point, "effective assumption" becomes the key criterion for measuring whether a township government can truly exercise administrative penalty power. In addition, the scope of empowering Townships with penalty power mainly refers to the powers urgently needed in grassroots governance. This means that the administrative penalty power of Townships must be consistent with the actual needs of their development.

4.2. Practice of empowering townships with penalty power

Since the revision of the Administrative Penalty Law in 2021, localities across China have actively explored empowerment mechanisms in light of their actual conditions. Provinces have begun to formulate normative documents on empowering Townships with law enforcement power one after another. Nationwide, most provincial governments have developed corresponding local regulations and policy documents. Beijing issued the Decision on Canceling and Delegating a Batch of Administrative Law Enforcement Powers in April 2021; Shanghai issued the First Batch of Administrative Law Enforcement Items List for Township Governments in July 2021; Zhejiang issued the Notice on Promoting Comprehensive Administrative Law Enforcement Work in Townships in January 2022; Chongqing issued the Implementation Opinions on Deepening the Reform of Comprehensive Administrative Law Enforcement in Townships in October 2023; and Shandong issued the Guiding Catalog for Empowering Administrative Law Enforcement Powers to Townships under the Jurisdiction of Pilot Counties (Cities, Districts) in March 2024.²⁴ These documents

²⁴ General Office of the State Council. Government Information Disclosure. Official Website of

provide a legal basis for law enforcement activities at the township and town level.

The empowerment models vary across different regions, with the first being the list-based empowerment model. For example, localities such as Beijing, Shanghai, and Zhejiang have successively formulated lists for empowering Townships with administrative penalty powers, and formed an operational model that combines list management with phased implementation. Beijing has developed a power list, delegated 431 items of administrative law enforcement power, and implemented these powers in the name of Townships. The Shanghai Municipal Government has formulated a power list, delegated 423 items of administrative law enforcement power in the first batch, and implemented these powers in the name of Townships. The Zhejiang Provincial Government has formulated a power list, delegated 409 items of administrative law enforcement power, and implemented these powers in the name of Townships. The second is the targeted empowerment model. Some provinces have explored a two-way interactive mechanism of "Townships placing orders, higher-level authorities fulfilling orders" to promote the accurate matching between empowerment and grassroots capacity to undertake the delegated powers. For example, Zhengzhou City, Henan Province only delegated 78 items in the initial phase. In some pilot areas of Guizhou Province, only 41 items (of administrative law enforcement power) have been delegated. This model avoids a "one-size-fits-all" approach to empowerment. The third is the model of integrating general-purpose law enforcement with empowerment. In some regions, comprehensive law enforcement matters and penalty powers are delegated simultaneously, allowing township-level law enforcement teams to adopt a "one team managing all law enforcement tasks" approach, which enhances the integration and coordination of law enforcement efforts. Additionally, Chongqing Municipality has established a new model of comprehensive administrative law enforcement at the township level, namely "statutory law enforcement + empowered law enforcement + entrusted law enforcement". Shandong Province formulates lists of administrative law enforcement powers that townships under the jurisdiction of pilot counties shall exercise; after review by municipal governments, these lists are uniformly submitted to the Provincial Committee's Organization and Establishment Commission and the Provincial Department of Justice for filing, and then enforced in the name of townships. When delegating penalty powers, most provinces and municipalities explicitly authorize township governments to conduct law enforcement in their own name, thereby strengthening the authority and efficiency of township governments in handling illegal cases. However, a small number of regions still adopt the "entrusted law enforcement" approach; for example, Chongqing has proposed the integrated model of "statutory law enforcement + empowered law enforcement + entrusted law enforcement".²⁵

5. Current status and dilemmas of the townships exercise the penalty power

In the actual operation of township-level administrative Penalty Power, a series of in-depth obstacles are encountered. These issues not only involve legislative defects but also include institutional and mechanism problems. The current system design is disconnected from the grassroots reality, leaving many newly assigned powers in a state of failure to be implemented, and the system of delegating Penalty Power is in a state of "idle operation".²⁶

the Central People's Government of the People's Republic of China. Available at: <https://www.gov.cn/zhengce/xxgk/index.htm> (access on 26 July 2025).

²⁵ Guo, H. L., & Yu, M. (2024). Investigation on the Implementation Status of the Power List System in Township Governments in China. In Proceedings of the 2023 2nd International Conference on Public Service, Economic Management and Sustainable Development (PESD 2023) (Vol. 273, p. 4). Springer Nature.

²⁶ Chen, M. H. (2024). Why the great differences: Observations and reflections on the delegation of administrative law enforcement power. *Theory and Reform*, (04), 84-100+176.

5.1. Legal deficiencies in the empowerment system affect the legitimacy of law enforcement

5.1.1. Ambiguity in legal provisions

Paragraph 1 of Article 24 of the Administrative Penalty Law stipulates that provinces, autonomous regions, and municipalities directly under the Central Government may, in light of their local actual conditions, decide to transfer the administrative penalty powers of the department-level authorities of county-level people's governments—powers that are urgently needed for grassroots management—to the township-level people's governments that are capable of effectively undertaking such powers, and shall organize regular evaluations. However, The Administrative Penalty Law does not specify in detail the specific steps and requirements for the procedure of delegating penalty powers. When delegating administrative penalty powers across various regions, there is a lack of unified decision-making standards and processes. This makes it difficult to effectively guarantee the legitimacy and rationality of power delegation.²⁷ Meanwhile, before delegating administrative penalty powers, most provinces have not conducted comprehensive assessments and screenings of the Townships to which the powers are to be delegated, and there is a lack of corresponding standards. Most provinces merely delegate administrative penalty powers without considering the actual capacity of township and town governments to undertake such powers. Since laws and regulations do not clearly specify the form, procedure, and standards for delegation, the empowerment practices across various regions lack scientific basis, which easily leads to arbitrariness in the allocation of powers and weakens the element of the rule of law at the grassroots level. Details regarding the subject responsible for delegating penalty powers, the conditions for Townships to undertake the delegated powers, and the scope of the delegated powers have not been specified. The Administrative Penalty Law stipulates that the subject of empowerment shall be "provinces, autonomous regions, and municipalities directly under the Central Government", but it does not clearly specify whether this refers to provincial-level people's governments or people's congresses and their standing committees. This means that provincial-level people's congresses and their standing committees can also authorize (the delegation of administrative penalty powers) by formulating local regulations or making decisions. Neither the scope of the delegated powers nor the definition of "urgent need" (as a criterion for undertaking conditions) has been clearly specified. Although the legal provisions include a requirement that township governments must "be capable of effectively undertaking" the powers as a prerequisite for receiving the delegated authority, the law does not provide an evaluation standard or operable assessment method for what constitutes "effectiveness".²⁸ Due to the lack of unified and clear rules and requirements, the allocation model of local law enforcement powers has become directly chaotic. Some regions have delegated over a thousand penalty powers at one time without distinguishing between the actual governance needs and undertaking capacities of towns and townships. Taking Qingshi Town in Changshan County as an example, after undertaking 299 penalty matters, the efficiency of case handling "did not improve but declined" because law enforcement personnel were not familiar with laws and regulations in professional fields such as urban planning and environmental protection.

<https://doi.org/10.13553/j.cnki.llygg.2024.04.007>.

²⁷ Zhang, Q. B., & Tong, H. W. (2022). Risks and Countermeasures of Administrative Power Delegation in the "Streamlining Administration, Optimizing Services, and Strengthening Regulation" Reform. *Journal of Huazhong University of Science and Technology (Social Sciences Edition)*, 36(05), 49-59. <https://doi.org/10.19648/j.cnki.jhustss1980.2022.05.08>

²⁸ Wu, H., 2025. Ibid.

5.1.2. Insufficient empowerment effectiveness of normative documents

Since the institutional design for the delegation of administrative penalty powers in higher-level laws is not yet fully clear, local governments have a high degree of discretionary power when formulating supporting normative documents.²⁹ Paragraph 2 of Article 24 of the Administrative Penalty Law stipulates that township people's governments that undertake the power of administrative penalty shall impose administrative penalties in accordance with the law within the prescribed scope. However, some developed provinces tend to use local regulations to clarify the scope and boundaries of penalty power delegation, which provides relatively strong guarantees in terms of procedural legitimacy and legality. However, such regulations have the disadvantages of a long formulation cycle and strict procedures, making them unfavorable for quickly responding to emerging new situations and problems in rural governance. In contrast, central and western regions or economically underdeveloped areas often promote the delegation of penalty powers through government rules, departmental normative documents, and policy guidance opinions. These types of documents have short formulation cycles and can be updated quickly, allowing them to respond promptly to local practical needs. Their shortcomings lie in the lack of strict public participation and expert demonstration, as well as insufficient effectiveness levels and legal binding force. Once higher-level laws do not clearly stipulate the key links in penalty power delegation, normative documents may tend to "expand powers", "make flexible adjustments", or even "create new powers".³⁰ Furthermore, due to the lack of effective involvement of judicial review or supervision mechanisms, it is difficult to form a smooth feedback loop for the implementation of normative documents (ensuring information flows from the grassroots to higher-level authorities and vice versa). Public participation in and supervision of the process are also restricted, which undermines the legitimacy and authority of the delegated administrative penalty powers at the grassroots level.

5.1.3. "One-size-fits-all" approach to the transfer of administrative penalty powers

In promoting reform, many localities adopt a "one-size-fits-all" model, transferring all administrative penalty powers originally exercised by county-level departments to Townships without considering the latter's capacity to undertake such powers. This has increased the administrative burden on Townships. Additionally, some localities, when delegating penalty powers, crudely offload difficult law enforcement tasks and complex responsibilities to Townships to achieve their own "burden reduction". While this appears to be a "decentralization of powers", it is essentially a transfer of powers and responsibilities. Improper power allocation may lead to a "burden-shifting" style of transferring powers and responsibilities. The sudden surge in law enforcement pressure has made Townships more inclined to adopt non-standardized and non-procedural governance methods when exercising penalty powers, gradually diluting the element of the rule of law.³¹ This phenomenon has seriously hindered the process of law-based governance in grassroots administrative law enforcement, and the exercise of administrative penalty powers

²⁹ Qi, H. 2023. Ibid.

³⁰ Ji Fang, Chu Minghao. (2024). Governance Absorbs Law Enforcement: How Township-Level Administrative Law Enforcement Operates—An Empirical Study Based on the Experience of Comprehensive Law Enforcement Reform in Multiple Townships in Central China. *Journal of Huazhong University of Science and Technology (Social Science Edition)*, 2024, 38(03): 95-105. <https://doi.org/10.19648/j.cnki.jhustss1980.2024.03.10>

³¹ Zhu Yuantian (2024). Research on the Practical Difficulties and Response Strategies of Township Administrative Law Enforcement Power. *Open Journal of Legal Science*, 12(9), 5728-5736. <https://doi.org/10.12677/ojls.2024.129815>

has gradually deviated from the track of the rule of law.

5.2. Prominent institutional and mechanism issues restricting grassroots law enforcement efficiency

5.2.1. Uneven allocation of grassroots administrative law enforcement resources

The actual job responsibilities of township-level staff do not fully align with the needs of grassroots law enforcement. In some townships, administrative tasks are diverse and complex, which hinders the effective implementation of law enforcement tasks.³² For instance, law enforcement officers in certain townships are required to undertake a series of social management tasks; these non-law enforcement tasks occupy a large amount of their time and energy, resulting in reduced efficiency in handling law enforcement cases. Furthermore, due to uneven resource allocation, the newly transferred penalty powers have not been effectively implemented.³³ Without sufficient material foundations and logistical support, law enforcement officers are powerless when faced with complex cases. Many grassroots-level governments suffer from insufficient financial funds, poor office spaces, inadequate allocation of law enforcement vehicles, and outdated law enforcement equipment. Data management still relies on paper documents and traditional archives, lacking efficient digital information processing methods. This directly leads to a lack of data support and information comparison in the law enforcement decision-making process, let alone the use of advanced means such as big data analysis and intelligent identification to optimize and upgrade law enforcement activities. Modern administrative law enforcement increasingly relies on advanced technical means; however, due to insufficient financial investment, the development of such infrastructure in townships lags far behind actual needs.³⁴

5.2.2. Insufficient professionalism of township-level administrative law enforcement entities

Due to the severe shortage of professional law enforcement officers, law enforcers frequently encounter issues such as improper application of laws and non-standard procedures in the actual law enforcement process, which impairs the legality and impartiality of law enforcement. Meanwhile, the overall quality and professional ethics of law enforcement officers are also key factors restricting law enforcement work. Due to the particularities of township societies, there are certain kinship or geographical ties between law enforcement officers and the subjects of law enforcement. Such ties easily lead to human relationship interference in law enforcement, making it difficult for law enforcement work to be fair and transparent. Although some townships occasionally organize special training sessions, these sessions lack systematicness and targeting, and thus fail to improve the overall quality and professional capabilities of law enforcement officers. The training of township law enforcement officers still relies on the experience passed down by senior employees to cultivate new recruits. Additionally, in township law enforcement teams, officers have diverse professional

³² Zhou, Z., & Huang, Q. (2025). The causes and resolution of grassroots burden from the perspective of field theory—taking the new round of township institutional reform in L town of C city as an example. *Social Science and Management*. <https://doi.org/10.61784/ssm3052>

³³ Wu, G. (2025). A brief analysis of comprehensive enforcement power downward to towns and streets government from the perspective of the system theory. *Theory and Practice of Science and Technology*, 6(1), 133-135. <https://doi.org/10.47297/taposatWSP2633-456925.20250601>

³⁴ Liu, M., & Zhang, R. T. (2024). On the legalization of the delegation of administrative Penalty Power and its limits. *Journal of Huazhong University of Science and Technology (Social Science Edition)*, 38(02), 88-98. <https://doi.org/10.19648/j.cnki.jhustss1980.2024.02.09>

backgrounds and varying levels of law enforcement experience. Coupled with the lack of reasonable personnel allocation and assessment mechanisms, this has reduced the authority and predictability of law enforcement to a certain extent. In 2025, provincial-level administrative regions in China such as Heilongjiang, Beijing, Jiangsu, Zhejiang, Guangdong, and Shandong have recovered some administrative penalty powers that were previously delegated to lower levels. Specifically: Heilongjiang Province has reclaimed 33 items of administrative penalty powers that were delegated to towns and townships; Beijing has recovered 20 items of administrative law enforcement powers delegated to towns and townships; Zhejiang Province has reduced the number of administrative law enforcement matters undertaken by Gulin Town from 835 to 453, reclaiming professional or low-frequency law enforcement powers such as the inspection of counterfeit and shoddy seeds in the agricultural and rural fields, and the illegal production of solid clay bricks.

Guangdong Province has recovered 25 items of environmental protection penalty powers. The main reasons for the recovery across regions are the insufficient undertaking capacity at the grassroots level and the lack of professionalization in law enforcement.

5.2.3. Poor development of coordination mechanisms for township-level administrative law enforcement

Paragraph 3 of Article 24 of the Administrative Penalty Law stipulates that the relevant local people's governments and their departments shall establish and improve a coordination and cooperation mechanism for administrative penalties. Although the Administrative Penalty Law clearly stipulates the basic principles of empowerment, it fails to clearly define the responsibility boundaries between different levels of government. This results in a mismatch between the responsibilities and authorities of townships, and even the phenomenon of "responsibility-authority inversion" (where responsibilities exceed authorized powers). In practical operations, grassroots law enforcement often faces problems such as law enforcement conflicts and ineffective law enforcement. The difficulty of coordination between townships and county-level departments has increased, and law enforcement efficiency has dropped significantly. In the actual implementation of grassroots comprehensive administrative law enforcement, there is a lack of substantive coordination between various departments.³⁵ The degree of cooperation among different entities is low, and the situation of "each acting on its own" (operating independently without coordination) still persists. This situation makes comprehensive law enforcement seem integrated in form, but in reality, it remains divided in terms of functions. It fails to achieve the true transfer of powers and sharing of resources, and thus cannot meet the expected effect of coordinated law enforcement.

5.3. Poor supervision mechanisms undermine the credibility of grassroots law enforcement

5.3.1. Inadequate external supervision leads to prominent arbitrariness in law enforcement

Paragraph 3 of Article 24 of the Administrative Penalty Law further stipulates that the relevant local people's governments and their departments shall strengthen organizational coordination, professional guidance, and law enforcement supervision. At present, the external supervision system for grassroots administrative law

³⁵ Yang, X. J. (2024). A study on the team construction of comprehensive administrative law enforcement reform at the township (sub-district) level: Taking J City, Shanxi Province as an example. *Journal of Western Studies*, (14), 51-54. <https://doi.org/10.16721/j.cnki.cn61-1487/c.2024.14.036>

enforcement has not yet been fully established, and grassroots law enforcement mainly relies on review and guidance from higher-level governments. However, in practice, after some provincial-level authorities delegated law enforcement powers to lower levels, they failed to track the effectiveness of law enforcement at the township level or public feedback. It was not until a large number of law enforcement disputes arose that they passively revoked some of the delegated powers. Township-level law enforcement lacks both regular professional guidance from county-level departments and an independent legal review mechanism. Among the lost lawsuits involving Jiangsu Province, many resulted from county-level departments' failure to fulfill their guiding and supervisory responsibilities, leading to procedural irregularities or incorrect application of law in township-level law enforcement. Meanwhile, regarding state power organs, the supervision of township people's congresses over the exercise of power by township governments exhibits the phenomenon of "being broad, loose, and weak" (supervision is superficial, not strict, and lacks force). The chairpersons and vice-chairpersons of township people's congresses have a wide range of responsibilities, most of which are "liaison" and "organizational" tasks. This makes it difficult for them to focus on conducting effective supervision. In terms of judicial organs, although procuratorates, as legal supervision organs, have supervision functions, they lack systematic supervision arrangements, making it difficult to form a stable supervision mechanism.³⁶ As important legal supervision and review organs, grassroots judicial offices have not fully exerted their role in the external supervision mechanism. Although judicial offices undertake functions such as legal review, law enforcement supervision, and legal training, the implementation of these functions is not in place. In the handling of some cases, judicial offices provide insufficient guidance on law enforcement details, resulting in arbitrariness and irregularities in legal procedures.

5.3.2. Incomplete internal accountability makes responsibility investigation difficult

At present, internal accountability mechanisms generally have problems such as unsound systems, non-transparent procedures, and insufficient implementation efforts. These issues lead to difficulties in implementing responsibility investigation and a lack of effective internal constraints on law enforcement actions. Township-level law enforcement work is subject to supervision by multiple higher-level departments, yet these departments have inconsistent supervision standards and assessment requirements. This leads to the widespread phenomenon of "multiple guidance and multiple assessments." Such a "one (township) to many (departments)" supervision model not only increases the workload of township governments but also undermines the effectiveness of supervision.³⁷ Furthermore, after county-level governments delegate administrative penalty powers, their enthusiasm for supervision is also affected. It is common for township governments and county-level departments to collaborate to cope with inspections, which further results in inadequate supervision. In addition, the lack of a unified coordination mechanism among supervision subjects leads to the shifting of responsibilities between different levels and a lack of effective cooperation. At the same time, the current assessment indicators are complex and often go beyond the scope of township governments' responsibilities, forcing them to take on additional tasks. This restricts township governments, reduces law enforcement efficiency, and ultimately not only plunges the operation of administrative penalty powers into difficulties but also may even lead to the risk of

³⁶ Liu, Z. (2025). Breaking Barriers to Stimulate New Momentum for Judicial Supervision. *People's Representative Daily*, (002). <https://doi.org/10.28649/n.cnki.nrmdb.2025.000147>

³⁷ Zhu, F. H., & Hou, Y. C. (2022). Theoretical construction and practical exploration of administrative accountability from the perspective of integrated accountability. *Study and Practice*, (03), 21-28+2. <https://doi.org/10.19624/j.cnki.cn42-1005/c.2022.03.013>

abuse of power.

5.3.3. Poor cooperation among multiple subjects affects rights protection

The roles of public supervision and residents' self-governance forces have not been fully exerted, and residents have not fully participated in the law enforcement process and the supervision of administrative penalties. Most townships are "acquaintance societies," where the public's legal awareness is relatively weak, and their enthusiasm and sense of responsibility for participating in supervision are not strong.³⁸ The supervisory functions of residents' self-governance organizations are usually limited to formal participation, lacking specific operational rules and implementation plans. In many places, neighborhood committees and village committees, although participating in the supervision of administrative law enforcement to a certain extent, fail to truly engage in the entire process of administrative penalties. Particularly in the process of case investigation, evidence collection, and ruling, they are unable to effectively safeguard the parties' right to know and right to defense. Residents' supervision only remains at the level of suggestions, making it difficult to impose substantive constraints on law enforcement actions.³⁹ Grassroots law enforcement also faces the problem of poor cooperation among multiple subjects. In some cases involving cross-departmental responsibilities—such as environmental protection and market supervision—grassroots law enforcement teams need to coordinate the opinions and resources of multiple departments. Due to poor information flow and unclear division of functions, departments fail to share case information in a timely manner, leading to delays in case handling and affecting the rights of the parties involved.

6. Countermeasures and suggestions for improving the exercise of administrative penalty powers by townships

6.1. Improve legal guarantees for the delegation of administrative penalty powers

6.1.1. refine the provisions of article 24 of the administrative penalty law

At present, this clause has been implemented in all 34 provinces, autonomous regions, and municipalities directly under the Central Government of China. Due to differences in the demand for administrative penalty powers and variations in the capacity to undertake such powers across different regions, it is imperative to implement "targeted empowerment." Based on the adaptive administrative theory advocated by German scholar Jurgen Wolfrum, researchers argue that administrative penalty powers should be delegated in a targeted manner to townships that possess corresponding law enforcement experience and professional capabilities. Relevant qualification standards, such as the number of law enforcement officers and the establishment of law enforcement agencies, can be formulated to ensure that law enforcement entities have sufficient law enforcement capabilities. It is also necessary to clearly stipulate the standard procedures for power delegation: the right to apply for power delegation may be assigned to municipal-level people's governments, which shall submit applications to provincial-level people's governments after comprehensively considering the opinions of county-level governments.

³⁸ Huang, X., Cui, T., Qiu, Q. (2023). Construction of the Supervision Mechanism for Non-Criminal Disposal by Administrative Law Enforcement Agencies. *Journal of the Party School of Shanxi Provincial Committee of the Communist Party of China*, 46(04), 83-87. <https://doi.org/10.13964/j.cnki.zgsxswdx.2023.04.010>

³⁹ Wang, S. R. (2025). Citizen supervision in administrative law enforcement: Institutional arrangements and effectiveness realization. *Journal of Nanyang Institute of Technology*, 17(03), 1-8. <https://doi.org/10.16827/j.cnki.41-1404/z.2025.03.001>

Administrative penalty powers shall be formally delegated only after being reviewed and approved by provincial-level people's governments. This procedure not only ensures the legality and standardization of the delegation process but also takes into account the actual needs of local governments, thereby safeguarding the scientificity and rationality of delegation decisions.⁴⁰ Currently, some provinces are exploring a two-way interactive mechanism of "townships placing orders and higher-level authorities fulfilling orders" to promote the accurate matching between empowerment and the grassroots' capacity to undertake powers. For instance, Zhengzhou City of Henan Province only delegated 78 items in the early stage, and some pilot areas in Guizhou Province only delegated 41 items. This model avoids the "one-size-fits-all" approach to empowerment. In addition, Regarding the issue that there is a lack of a review process for the scope and content of the delegation of administrative penalty powers, researchers argue that it is necessary to add a legal review link. The review process must include the following: Assessing the law enforcement capacity of townships to ensure they have sufficient law enforcement resources and experience, Examining the rationality of the content to ensure that the delegated powers meet practical needs, Designing a supervision mechanism after delegation to ensure effective supervision of the delegated powers. In addition, provisions can be made to publicize the review results, so as to ensure the transparency and impartiality of the review process.

6.1.2. Enhance the standardization of legal empowerment

To enhance the standardization of empowerment, the first step is to improve the institutional design of higher-level laws. Researchers suggest that key links in the delegation of administrative penalty powers should be specified in detail, including the specific steps for power transfer, approval procedures, and division of responsibilities. Additionally, unified guiding documents or normative guidelines should be formulated. Regarding the issue that local governments often advance power delegation through government rules, departmental normative documents, and policy guidance opinions, researchers argue that priority should be given to clarifying the scope and boundaries of penalty power delegation through local regulations. Local regulations possess higher procedural legitimacy and legal effect; they can provide grassroots law enforcement agencies with clear legal bases and law enforcement standards, thereby reducing arbitrariness and irregularities in the law enforcement process.⁴¹ Due to the constant changes in the grassroots law enforcement environment and social governance needs, the existing normative documents need to be adjusted and updated in a timely manner. It is necessary to establish a regular assessment and revision mechanism to ensure that normative documents conform to the actual needs of grassroots law enforcement and legal requirements. Additionally, legal supervision and judicial review of normative documents should be strengthened to prevent the occurrence of "power expansion", "flexible adaptation" or "creation of new powers". Judicial organs should be allowed to review and correct local regulations and normative documents that violate higher-level laws, so as to safeguard the legality and constitutionality of the delegation of administrative penalty powers.

6.1.3. Optimize the allocation of powers and responsibilities for penalty powers

In the process of delegating penalty powers to townships, refined power allocation should be carried out to avoid the "one-size-fits-all" approach to power delegation.

⁴⁰ Baier, M. (Ed.). (2013). *Social and Legal Norms: Towards a Socio-legal Understanding of Normativity* (1st ed.). Routledge. <https://doi.org/10.4324/9781315609416>

⁴¹ Romano, S. (2017). *The Legal Order* (M. Croce, Trans.; 1st ed.). Routledge. <https://doi.org/10.4324/9781315164519>

Researchers suggest formulating detailed standards and procedures for power allocation to ensure that powers are matched with corresponding responsibilities. Based on the system of a "dynamically adjustable empowerment list", a more precise and classified authorization model should be realized.⁴² The dynamically adjustable empowerment list system consists of two parts: a "basic list" and a "customized list". The "basic list" is uniformly formulated by provincial-level governments, defining the scope of administrative penalty items that townships are generally suitable to undertake. This ensures the standardization and universal applicability of empowerment for basic items. On the basis of the basic list, each township can, in light of the governance characteristics and practical needs of its jurisdiction, put forward more personalized empowerment demands from the grassroots up to establish a "customized list". The specific empowerment items in the customized list are not completely fixed; instead, they are dynamically adjusted and updated in accordance with the economic and social development at the grassroots level, the patterns of illegal acts, and the improvement of governance capabilities. The establishment of a dynamically adjustable "dual-list" system can not only effectively respond to the needs and differences of grassroots governance but also help achieve refined and precise allocation of grassroots law enforcement powers.

6.2. Establish a hierarchical and classified operation mechanism for administrative penalty powers

6.2.1. Explore differentiated implementation of administrative penalty powers

To achieve precise governance and efficient law enforcement, administrative penalty powers should be allocated in a differentiated manner according to the type and functional positioning of townships. This ensures that grassroots governments can effectively undertake and perform the assigned functions and responsibilities.⁴³ For some functional townships—such as economically developed towns and towns with characteristic industries—a more flexible operational model for administrative penalty powers, namely the "progressive empowerment + departmental guidance + regional linkage" model, should be adopted. Township governments may first undertake basic law enforcement matters closely related to their development; after their grassroots governance experience and law enforcement capabilities are enhanced, the scope of empowerment can be gradually expanded. At the same time, relevant functional departments of county-level governments should provide daily guidance and regular professional training. Through joint law enforcement, professional counseling, information sharing, and other means, they should gradually improve the professional quality and duty-performance capabilities of township law enforcement teams. For purely agricultural towns and towns in remote areas—where economic development is backward and law enforcement resources and capabilities are relatively weak—the principle of prudent empowerment should be adopted. The focus should be on incorporating basic governance matters that are closely related to daily life and have low law enforcement difficulty into the scope of grassroots empowerment. Meanwhile, county-level departments should strengthen joint law enforcement support and professional technical assistance to grassroots levels, ensuring that townships can obtain effective support in actual law enforcement and avoiding law enforcement failure or illegal risks caused by insufficient undertaking capacity at the grassroots level.

⁴² Lawrence, M. B. (2021). Subordination and Separation of Powers. *The Yale Law Journal*, 131(1). 78-174. Available at: <https://www.jstor.org/stable/45400882> (access on 26 July 2025).

⁴³ Richards, Z. (2018). *Responsive Legality: The New Administrative Justice* (1st ed.). Routledge. <https://doi.org/10.4324/9780429489822>

6.2.2. Establish a trinity model for the operation of administrative penalty powers

After administrative penalty powers are delegated to townships, whether they can operate in a standardized manner depends on the reasonable matching between the law enforcement capabilities of grassroots governments and the delegated powers. Researchers suggest that it is necessary to establish a closed-loop power operation mechanism with the trinity of "penalty power delegation—capacity assessment—dynamic adjustment" to ensure the precise allocation and dynamic optimization of grassroots administrative law enforcement powers. It is necessary to establish a pre-empowerment capacity assessment system for the delegation of administrative penalty powers. Provincial, municipal, or county-level governments should organize experts to conduct capacity review and assessment of townships that intend to receive penalty powers. The assessment content includes: the status of law enforcement personnel in grassroots governments; the allocation of law enforcement infrastructure; the complexity and frequency of illegal acts within the jurisdiction; the handling quality of historical law enforcement cases; and feedback on public satisfaction. After the formal delegation of penalty powers, continuous tracking of grassroots governments' implementation of the powers should be conducted, including the legality, standardization, rationality, and transparency of law enforcement activities; the completion rate, timeliness, and standardization of law enforcement cases; and the degree of public recognition. Regarding the application of assessment results, a dynamic adjustment mechanism for the scope of empowerment should also be established, and a differentiated and dynamic management model for administrative penalty powers should be implemented. For townships with high law enforcement efficiency, strong professional law enforcement capabilities, high public satisfaction, and low administrative dispute rates, the scope of empowerment can be expanded in a timely manner. For areas with obviously insufficient capabilities, frequent administrative disputes, and low public satisfaction, it is necessary to promptly suspend or withdraw some empowered matters, require rectification and improvement as well as training within a time limit, and conduct precise interventions through measures such as professional guidance, personnel training, or optimized resource allocation. After the capabilities are enhanced, a re-assessment should be conducted to decide whether to restore or adjust the scope of penalty powers again, so as to ensure the precise matching between grassroots law enforcement capabilities and the delegated penalty matters.

6.2.3. Establish a linkage mechanism for administrative penalty powers

In the ongoing process of delegating administrative penalty powers, it is necessary to build a linked law enforcement mechanism with county-level governments as the overall coordination entities, townships as frontline law enforcement entities, and county-level functional departments as deep participants. This aligns with the emphasis on multi-subject collaboration in the polycentric governance theory proposed by American scholar Elinor Ostrom. First, county-level governments should assume coordination and support responsibilities in the operation of administrative penalty powers. They need to issue specific linked law enforcement systems, clarify the cooperation and support responsibilities of various functional departments for grassroots law enforcement activities, formulate linked response procedures, time-limit requirements, and specific duties for law enforcement cooperation, and form clear responsibility lists and procedural norms. Additionally, a joint county-township law enforcement meeting system can be established to strengthen collaborative research and collective decision-making on difficult issues in grassroots law enforcement. Second, an institutionalized departmental response mechanism should be established to make the participation

and collaboration of county-level functional departments more rigid and regular. After receiving a request, the county-level government shall designate a leading functional department to organize relevant departments to respond promptly and provide law enforcement resources and professional and technical support within a time limit. At the same time, for departments that fail to respond on time or perform their duties inadequately, corresponding administrative responsibilities or economic penalty measures should be clearly defined to form institutional and rigid constraints, ensuring that the law enforcement needs of the grassroots are responded to in a timely manner.

6.3. Enhance the professionalization level of township-level administrative law enforcement

6.3.1. Improve grassroots legal personnel allocation and financial guarantee

Regarding the shortage of legal personnel in grassroots law enforcement teams, researchers suggest that the government should increase efforts to allocate legal personnel at the grassroots level. Especially in areas involving relatively complex and highly professional administrative penalties, it is essential to ensure the allocation of sufficient legal personnel. These legal personnel should not only possess legal knowledge and law enforcement experience but also receive regular professional training to ensure they can provide real-time legal guidance to grassroots law enforcement officers.⁴⁴ At the same time, the job responsibilities of grassroots administrative law enforcement officers should be more clearly defined, and task allocation should align with law enforcement needs. The optimization of financial supply is an important guarantee for ensuring the effective use of administrative law enforcement resources. For townships with a relatively weak economic foundation, insufficient financial supply will restrict the allocation of law enforcement equipment and the conduct of daily work. Therefore, while delegating powers, county-level governments should transfer corresponding financial resources simultaneously to ensure the adequacy of law enforcement equipment and funds. When transferring powers, county-level government departments should also hand over necessary administrative law enforcement equipment to township law enforcement departments. This ensures that townships have sufficient financial support when exercising administrative penalties, thereby promoting the stable and effective operation of grassroots law enforcement mechanisms.

6.3.2. Strengthen the professionalization of grassroots law enforcement teams

In response to the common problems of insufficient legal literacy and low professionalism among grassroots law enforcement officers, researchers suggest that the professional entry threshold for grassroots law enforcement officers should be strengthened at the institutional level. Clear qualification standards for grassroots law enforcement officers' employment should be defined to ensure that law enforcement entities possess professional literacy and law enforcement capabilities matching their authority. Meanwhile, a sound hierarchical and classified training system for law enforcement officers should be established. For example: Conduct "pre-service training" for newly recruited personnel, Provide "specialized training" on hot issues, difficult problems, and high-frequency law enforcement matters in law enforcement practice, Offer "thematic training" on law enforcement skills and risk prevention, Finally, establish a "continuing education" system for law enforcement officers,

⁴⁴ Nakonechnyi, O. (2023). Ensuring the effectiveness of professionalization of local self-government officials. *Democratic Governance*, 1(16), 144-156. <https://doi.org/10.23939/dg2023.01.144>

implementing a regular rotation training and continuing education system for them. At least one comprehensive legal knowledge update training should be organized for grassroots law enforcement officers every year. Combined with the latest development trends of laws and regulations and typical law enforcement cases, legal experts, judges, procurators, or frontline law enforcement backbones with law enforcement experience should be invited to give lectures. This enables the continuous improvement of law enforcement officers' ability to apply laws, analyze evidence, and administer justice in accordance with the law, maintains the dynamic update and steady improvement of the professional level and rule of law literacy of grassroots law enforcement teams, and ultimately achieves the professionalization and standardization of grassroots law enforcement teams.

6.3.3. Promote law enforcement resource sharing and technological empowerment

To address practical issues such as low law enforcement efficiency and poor law enforcement effectiveness after townships undertake administrative penalty powers, researchers suggest that a county-township resource sharing mechanism for grassroots administrative law enforcement should be established. County-level governments should coordinate and integrate various law enforcement resources, build a long-term business collaboration and technical support system, and promote the efficient sinking of law enforcement forces to the grassroots level. Modern technologies should be fully utilized to promote the sharing and utilization of law enforcement information resources between counties and townships. The technical means of "Internet + Supervision" should be fully leveraged to establish a three-level integrated law enforcement information sharing platform covering counties, townships, and villages. The online creation and circulation of law enforcement processes, law enforcement documents, and penalty decisions should be improved, realizing the full-process digital management and supervision of grassroots law enforcement cases.⁴⁵ The platform should also realize multiple functions, such as real-time sharing of law enforcement data, online learning and training for law enforcement officers, and shared learning of typical law enforcement cases. This will further improve the standardization, accuracy, and transparency of grassroots law enforcement, and reduce arbitrariness and abuse of discretion in the law enforcement process. Townships can also establish long-term cooperative relationships with local colleges and universities, research institutions, social organizations, and other entities, and introduce professional and technical forces to participate in providing technical support and resource supply for grassroots law enforcement, so as to ensure the continuous improvement of the capabilities of grassroots law enforcement teams.

6.4. Reshape the supervision system for township-level administrative law enforcement

6.4.1. Strengthen external supervision of the administrative system

Strengthening the external supervision mechanism requires efforts from multiple aspects. First, enhance the supervisory role of deputies to the People's Congress in administrative law enforcement. Township-level People's Congresses should conduct regular comprehensive inspections of the administrative law enforcement activities of township governments, promptly feed back the problems identified, and promote the rectification of these problems. Second, strengthen the supervisory functions of judicial organs, particularly the legal supervision role of procuratorates. As legal supervision organs, procuratorates should proactively intervene in grassroots

⁴⁵ McCulloch, A., & McGarry, J. (Eds.). (2017). *Power-Sharing: Empirical and Normative Challenges* (1st ed.). Routledge. <https://doi.org/10.4324/9781315636689>

administrative law enforcement activities to ensure the legality of administrative law enforcement. Procuratorates can also establish a regular information sharing and case feedback mechanism with grassroots law enforcement agencies to promptly identify and correct illegal or non-compliant administrative acts.⁴⁶ Grassroots judicial offices should also play a more important role in the external supervision system. They should regularly dispatch legal personnel to join grassroots law enforcement teams, participating in case file review, law enforcement guidance, and other work to enhance their ability to supervise and guide the entire process of administrative law enforcement. Only when grassroots judicial offices have independent supervisory capabilities can the independence and authority of their supervisory functions be ensured.

6.4.2. Implement internal supervision of the administrative system

The top priority in constructing the township-level administrative law enforcement supervision mechanism is to start with strengthening internal supervision. Researchers argue that the supervisory responsibilities of governments and departments at all levels should be clarified, and the assessment system should be optimized to ensure that township governments exercise administrative penalty powers in accordance with the law and effectively. As the authority that delegates administrative penalty powers, county-level governments bear the responsibilities of supervision and guidance. Entrusting powers does not mean abandoning supervision; county-level departments shall provide continuous professional guidance and supervision over the law enforcement activities of township governments. Township-level self-supervision and higher-level supervision must complement each other. It is also necessary to strengthen administrative reforms and clarify the responsibilities of different supervisory entities.⁴⁷ Meanwhile, the evaluation and assessment of administrative law enforcement is a key measure for self-regulation by administrative organs. The assessment shall cover the entire process of law enforcement—from pre-enforcement preparation and in-process implementation to post-enforcement summary and evaluation—and adjustments shall be made when necessary. In terms of setting assessment indicators, classified indicators and quantifiable standards should be established based on the functional characteristics of different townships. The implementation of the assessment shall adopt a multi-level mechanism: monthly, quarterly, and annual assessment cycles shall be set, and special assessments shall also be established for emergency incidents.

6.4.3. Foster a pattern of multi-subject co-governance at the grassroots level

To enhance the fairness and transparency of grassroots administrative law enforcement, it is essential to improve the multi-subject co-governance and supervision system, promote the joint participation of all parties, and achieve effective supervision. First, increasing the participation of residents' self-governance organizations is crucial. A standardized resident supervision process needs to be established to ensure that residents can participate in all links of administrative penalties, especially in the process of case investigation, evidence collection, and ruling. Second, a sound feedback mechanism should be established to ensure that the supervision opinions put forward by residents can be promptly handled and responded

⁴⁶ Jin, H. (2023). The path to improve the procuratorial suggestion working mechanism in the new era. *Global Academic Frontiers*, 1(1), 39-44. <https://doi.org/10.5281/zenodo.11079583>

⁴⁷ Qi, Y. (2023). A Chinese model of cross-control of administrative power: a case study based on the reform of administrative reconsideration and the non-lawsuit administrative execution system. *Peking University Law Journal*, 11(1), 127-148. <https://doi.org/10.1080/20517483.2023.2224640>

to. This will enhance residents' trust in the administrative penalty process and improve their enthusiasm for participation and sense of supervision responsibility. Third, strengthen collaboration and information sharing among grassroots administrative law enforcement departments. Relying on big data platforms, a digital law enforcement management system should be built to realize real-time uploading and dynamic recording of the entire law enforcement process, thereby improving law enforcement transparency. In addition, a linkage mechanism between grassroots comprehensive law enforcement and community dispute mediation can be established, integrating grassroots administrative penalties with community self-governance and civil mediation. This will enhance the humanization of grassroots law enforcement and its social acceptance. Finally, make full use of online platforms and public participation mechanisms, encourage multiple forces such as social organizations and the media to jointly participate in supervision, and promote the formation of a joint supervision force involving all sectors of society.

7. Conclusion

Article 24 of the Administrative Penalty Law revised in 2021 established the legal framework for provincial governments to delegate administrative penalty powers, providing an institutional foundation for the downward shift of law enforcement focus. This provision has been implemented in all 34 provinces, autonomous regions, and municipalities directly under the Central Government of China. The delegation of administrative penalty powers to townships in China is not a simple transfer of power, but rather the conferral of such powers from county-level government departments to townships within the existing legal framework, legally endowing township governments with administrative penalty powers. Its core lies in breaking the misalignment of powers and responsibilities under the traditional bureaucratic system where "those who can see (the problems) cannot manage them, and those who can manage them cannot see (the problems)". Through the dynamic balance between legal authorization and local practice, it aims to construct a law enforcement system characterized by "rigid constraints of the legal framework, flexible adaptation of governance mechanisms, and precise empowerment through technical means", forming a new paradigm of grassroots governance featuring "law-based law enforcement, collaborative governance, technological support, and social co-governance". The delegation of administrative penalty powers has not only strengthened the grassroots government's capabilities in overall coordination, public service provision, social management, and law enforcement supervision, but also promoted the transformation of the national governance system from "top-down hierarchical management" to "vertical and horizontal collaborative flat governance". This shift brings governance resources closer to actual needs and enhances the overall effectiveness of national governance. This paper cites the theories of administrative power localization proposed by Dan Corry, Gerry Stoker, and other scholars to advocate for law enforcement powers for China's township-level administrations. Meanwhile, Otto Mayer's principle of legal reservation defines the power boundaries for township-level law enforcement in China, Hartmut Maurer's theory of procedural justice promotes the standardization of law enforcement, and Elinor Ostrom's polycentric governance theory provides institutional support for multi-stakeholder co-governance. However, township-level governments in China currently face numerous difficulties and obstacles in exercising administrative law enforcement powers. These include legal flaws in the empowerment system, institutional and mechanism imbalances that restrict grassroots law enforcement efficiency, and inadequate supervision mechanisms that undermine the credibility of grassroots law enforcement. This paper analyzes the current situation of township-level administrative penalty power exercise in China from the perspectives of legal norms and their implementation, identifying several key issues: ambiguous legal provisions,

insufficient effectiveness of empowerment through normative documents, a "one-size-fits-all" approach to the transfer of administrative penalty powers, uneven distribution of grassroots law enforcement resources, inadequate professionalization of township-level law enforcement subjects, poor development of collaborative mechanisms for township-level law enforcement, insufficient external supervision, imperfect internal accountability systems, and disharmonious cooperation among multiple stakeholders. In response to these problems, the researchers propose corresponding improvement suggestions. Firstly, improve the legal guarantee for the delegation of administrative penalty powers. For example, refine the provisions of Article 24 of the Administrative Penalty Law to enhance the standardization of legal empowerment and optimize the allocation of powers and responsibilities related to penalty powers. Secondly, construct a hierarchical and classified operation mechanism for administrative penalty powers. This includes exploring differentiated implementation of administrative penalty powers, establishing a trinity model for the operation of such powers, and establishing a linkage mechanism for administrative penalty powers. Thirdly, enhance the professionalization level of township-level administrative law enforcement. This involves improving the allocation of legal resources and financial guarantees at the grassroots level, strengthening the professional development of grassroots law enforcement teams, and promoting the sharing of law enforcement resources and technical empowerment. Finally, reshape the supervision system for township-level administrative law enforcement. Measures include strengthening external supervision of the administrative system, implementing internal supervision within the administrative system, and fostering a pattern of multi-stakeholder co-governance at the grassroots level. It is hoped that these suggestions will contribute to the legalization of grassroots law enforcement powers in China.

8. Reference

- Baier, M. (Ed.). (2013). *Social and Legal Norms: Towards a Socio-legal Understanding of Normativity* (1st ed.). Routledge. <https://doi.org/10.4324/9781315609416>
- Cai, D. (1996). Introduction to the administrative penalty law of China. *Colum. J. Asian L.*, 10, 259.
- Chen, M. H. (2024). Why the great differences: Observations and reflections on the delegation of administrative law enforcement power. *Theory and Reform*, (04), 84-100+176. <https://doi.org/10.13553/j.cnki.llygg.2024.04.007>.
- Corry, D., & Stoker, G. (2002). *New Localism: refashioning the centre-local relationship*. The New Local Government Network (NLGN). Available at: <http://eprints.soton.ac.uk/id/eprint/47391> (access on 26 July 2025).
- Dahl, R. A. (1956). *A preface to democratic theory* (Vol. 115). University of Chicago Press.
- Freeman, J. (1997). Collaborative governance in the administrative state. *UCLA L. Rev.*, 45, 1.
- General Office of the State Council. *Government Information Disclosure*. Official Website of the Central People's Government of the People's Republic of China. Available at: <https://www.gov.cn/zhengce/xxgk/index.htm> (access on 26 July 2025).
- Guo, H. L., & Yu, M. (2024). Investigation on the Implementation Status of the Power List System in Township Governments in China. In *Proceedings of the 2023 2nd International Conference on Public Service, Economic Management and Sustainable Development (PESD 2023)* (Vol. 273, p. 4). Springer Nature.
- Guohua, J., & Zhongyuan, S. (2022). Research on the Legal Nature of the Devolution of Law Enforcement Power to Townships and Sub-Districts. *China Legal Sci.*, 10, 3.
- Hestermeyer, H. P., König, D., Matz-Lück, N., Röben, V., Seibert-Fohr, A., Stoll, P. T., & Vöneky, S. (2011). *Coexistence, Cooperation and Solidarity* (2 vols.): *Liber Amicorum Rüdiger Wolfrum*. Martinus Nijhoff Publishers.
- Huang, X., Cui, T., Qiu, Q. (2023). Construction of the Supervision Mechanism for Non-Criminal Disposal by Administrative Law Enforcement Agencies. *Journal of the Party School of Shanxi Provincial Committee of the Communist Party of China*, 46(04), 83-87. <https://doi.org/10.13964/j.cnki.zgsxswdx.2023.04.010>
- Ji Fang, Chu Minghao. (2024). Governance Absorbs Law Enforcement: How Township-Level

- Administrative Law Enforcement Operates—An Empirical Study Based on the Experience of Comprehensive Law Enforcement Reform in Multiple Townships in Central China. *Journal of Huazhong University of Science and Technology (Social Science Edition)*, 2024, 38(03): 95-105. <https://doi.org/10.19648/j.cnki.jhustss1980.2024.03.10>
- Jin, H. (2023). The path to improve the procuratorial suggestion working mechanism in the new era. *Global Academic Frontiers*, 1(1), 39-44. <https://doi.org/10.5281/zenodo.11079583>
- Kenny, G. K., Wilson, D. C. (1984). The interdepartmental influence of managers: Individual and sub-unit perspectives. *Journal of Management Studies*, 21(4), 409-425. <https://doi.org/10.1111/j.1467-6486.1984.tb00236.x>
- Lawrence, M. B. (2021). Subordination and Separation of Powers. *The Yale Law Journal*, 131(1). 78-174. Available at: <https://www.jstor.org/stable/45400882> (access on 26 July 2025).
- Liu, M., & Zhang, R. T. (2024). On the legalization of the delegation of administrative Penalty Power and its limits. *Journal of Huazhong University of Science and Technology (Social Science Edition)*, 38(02), 88-98. <https://doi.org/10.19648/j.cnki.jhustss1980.2024.02.09>
- Liu, Z. (2025). Breaking Barriers to Stimulate New Momentum for Judicial Supervision. *People's Representative Daily*, (002). <https://doi.org/10.28649/n.cnki.nrmdb.2025.000147>
- Mannori, L., Sordi, B. (2009). Science of administration and administrative law. In *A Treatise of Legal Philosophy and General Jurisprudence: Vol. 9: A History of the Philosophy of Law in the Civil Law World, 1600-1900; Vol. 10: The Philosophers' Philosophy of Law from the Seventeenth Century to our Days* (pp. 225-261). Dordrecht: Springer Netherlands.. https://doi.org/10.1007/978-90-481-2964-5_6
- Maurer, H., Waldhoff, C. (2006). *Allgemeines verwaltungsrecht* (Vol. 16). München: CH Beck.
- McCulloch, A., & McGarry, J. (Eds.). (2017). *Power-Sharing: Empirical and Normative Challenges* (1st ed.). Routledge. <https://doi.org/10.4324/9781315636689>
- Nakonechnyi, O. (2023). Ensuring the effectiveness of professionalization of local self-government officials. *Democratic Governance*, 1(16), 144-156. <https://doi.org/10.23939/dg2023.01.144>
- Nonet, P., Selznick, P., & Kagan, R.A. (2001). *Law and Society in Transition: Toward Responsive Law* (1st ed.). Routledge. P18. <https://doi.org/10.4324/9780203787540>
- Ostrom, E. (2009). *Understanding institutional diversity*. Princeton university press.
- Ostrom, V. (1999). Polycentricity (part 1). *Polycentricity and local public economies*, 52-74. Available at: https://books.google.de/books?hl=en&lr=&id=iBZ32c7KLWUC&oi=fnd&pg=PA52&dq=Vincent+Ostrom&ots=fdEsv5XzgI&sig=suNNOuaK-GQtePn4jVaBCFQsCPk&redir_esc=y#v=onepage&q=Vincent%20Ostrom&f=false (access on 26 July 2025).
- Qi, H. (2023). A brief analysis of the theoretical logic and system operation of the downward shift of administrative law enforcement power. *Advances in Education, Humanities and Social Science Research*, 5(1), 373-373. <https://doi.org/10.56028/aeHSSR.5.1.373.2023>
- Qi, Y. (2023). A Chinese model of cross-control of administrative power: a case study based on the reform of administrative reconsideration and the non-lawsuit administrative execution system. *Peking University Law Journal*, 11(1), 127-148. <https://doi.org/10.1080/20517483.2023.2224640>
- Richards, Z. (2018). *Responsive Legality: The New Administrative Justice* (1st ed.). Routledge. <https://doi.org/10.4324/9780429489822>
- Romano, S. (2017). *The Legal Order* (M. Croce, Trans.; 1st ed.). Routledge. <https://doi.org/10.4324/9781315164519>
- Rose-Ackerman, S., & Palifka, B. J. (2016). *Corruption and government: Causes, consequences, and reform*. Cambridge university press.
- Schmidt-De Caluwe, R. (1999). *Der Verwaltungsakt in der Lehre Otto Mayers: staatsrechtliche Grundlagen, dogmatische Ausgestaltung und deren verfassungsbedingte Vergänglichkeit* (Vol. 38). Mohr Siebeck.
- Stoker, G. (1991). *The politics of local government*. Bloomsbury Publishing. Available at: https://books.google.de/books?hl=en&lr=&id=uZBKEAAQBAJ&oi=fnd&pg=PR11&dq=The+Politics+of+Local+Government&ots=_s6ZXsxEj2&sig=FnnqJXE7qtB3tWmYhfS9sLTVtZM&redir_esc=y#v=onepage&q=The%20Politics%20of%20Local%20Government&f=false (access on 26 July 2025).
- The National People's Congress. Article 2 of the Law of the People's Republic of China on Administrative Penalty (Revised in 2021). Announcement Date: January 22, 2021, Effective Date: July 15, 2021. Available at: <https://flk.npc.gov.cn/detail?id=ff8080817703add20177373df6a43e33&fileId=&type=&title=%E4%B8%AD%E5%8D%8E%E4%BA%BA%E6%B0%91%E5%85%B1%E5%92%8C>

- %E5%9B%BD%E8%A1%8C%E6%94%BF%E5%A4%84%E7%BD%9A%E6%B3%95 (access on 26 July 2025).
- Wade, W., & Forsyth, C. F. (2014). *Administrative law*. Oxford University Press, USA.
- Wang, S. R. (2025). Citizen supervision in administrative law enforcement: Institutional arrangements and effectiveness realization. *Journal of Nanyang Institute of Technology*, 17(03), 1-8. <https://doi.org/10.16827/j.cnki.41-1404/z.2025.03.001>
- Wedde, H. F., Lischka, M. (2003). Cooperative role-based administration. In *Proceedings of the eighth ACM symposium on Access control models and technologies*. (pp. 21-32).
- Wu Huan & Xia Ying. (2025). Vertical and Horizontal Allocation of Relatively Concentrated Administrative Penalty Power and Its Limitations. *Journal of Harbin Institute of Technology (Social Sciences Edition)*, 27(03), 26-32. <https://doi.org/10.16822/j.cnki.hitskb.2025.03.003>
- Wu, G. (2025). A brief analysis of comprehensive enforcement power downward to towns and streets government from the perspective of the system theory. *Theory and Practice of Science and Technology*, 6(1), 133-135. <https://doi.org/10.47297/taposatWSP2633-456925.20250601>
- Yang, X. J. (2024). A study on the team construction of comprehensive administrative law enforcement reform at the township (sub-district) level: Taking J City, Shanxi Province as an example. *Journal of Western Studies*, (14), 51-54. <https://doi.org/10.16721/j.cnki.cn61-1487/c.2024.14.036>
- Zhang, C., Pei, L. (2024). Research on the Chinese Government's Administrative Law Enforcement Supervision Issues in the Chinese Government. *Advances in Economics and Management Research*, 9(1), 23-23. <https://doi.org/10.56028/aemr.9.1.23.2024>
- Zhang, Q. B., & Tong, H. W. (2022). Risks and Countermeasures of Administrative Power Delegation in the "Streamlining Administration, Optimizing Services, and Strengthening Regulation" Reform. *Journal of Huazhong University of Science and Technology (Social Sciences Edition)*, 36(05), 49-59. <https://doi.org/10.19648/j.cnki.jhustss1980.2022.05.08>
- Zhou, Z., & Huang, Q. (2025). The causes and resolution of grassroots burden from the perspective of field theory—taking the new round of township institutional reform in L town of C city as an example. *Social Science and Management*. <https://doi.org/10.61784/ssm3052>
- Zhu Yuantian (2024). Research on the Practical Difficulties and Response Strategies of Township Administrative Law Enforcement Power. *Open Journal of Legal Science*, 12(9), 5728-5736. <https://doi.org/10.12677/ojls.2024.129815>
- Zhu, F. H., & Hou, Y. C. (2022). Theoretical construction and practical exploration of administrative accountability from the perspective of integrated accountability. *Study and Practice*, (03), 21-28+2. <https://doi.org/10.19624/j.cnki.cn42-1005/c.2022.03.013>