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Posted Date: 29 December 2025

doi: 10.20944/preprints202512.2483.v1

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Article

From Procedural Completeness to Audit-Proof Security: The Public Disclosure Gap in Rules Governing the Disclosure of Foreign-Related Impacts and Agency Relationships by Legislative Proposal Submitters to the National People's Congress

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Abstract

This paper employs the OSINT evidence auditing methodology for normative texts, using publicly available and verifiable normative documents as the evidentiary boundary. It examines the configuration of disclosure rules governing foreign influence and agency relationships of proposal entities during the legislative proposal stage of the National People's Congress and its Standing Committee. Through clause-by-clause verification of authoritative texts including the Legislation Law and the Rules of Procedure of the NPC/NPCSC, this study finds that current disclosure rules adequately address meeting procedures and the structure of attached materials versus exceptions. However, they fail to codify provisions concerning disclosure of foreign influence/agency relationships, the entities and standards for tiered verification, and the closed-loop audit trail field. Guided by the principle of proportionality, this paper proposes a minimal closed-loop solution comprising 'minimum disclosure set—tiered verification—audit trail—security exceptions/remedies'. It provides a set of trigger conditions, threshold calibration mechanisms, and an audit field dictionary directly embeddable into regulations to support the upgrade of legislative security through auditability. Furthermore, the Explanatory Notes on the Draft Amendment to the Legislation Law of the People's Republic of China indicate that the amendment seeks to strengthen disclosure of 'explanatory statements and reports' alongside constitutional review information: For instance, it mandates that explanatory notes to draft laws include relevant opinions concerning constitutionality issues. It further requires timely publication of legal texts, announcements, draft explanatory notes, deliberation outcome reports, and other materials in the Gazette of the Standing Committee of the National People's Congress and on the NPC website, thereby providing institutional interfaces for establishing 'audit-safe' rule-based traceability. However, this explanatory note itself does not constitute a mandatory provision for disclosing and verifying 'proposing entities' foreign-related impacts/agency relationships'. The Rules of Procedure of the National People's Congress of the People's Republic of China further stipulate: When a delegation or 30 or more deputies jointly propose a bill, the Presidium shall decide whether to include it in the agenda. For bills included in the agenda, the proposers and relevant institutions 'shall provide relevant materials,' and the proposers 'shall submit an explanatory statement on the bill.' Concurrently, meetings shall be held publicly as a principle, with closed sessions permitted when necessary, establishing an 'open-as-a-rule, closed-as-an-exception' institutional framework.

Keywords: legislative procedure; OSINT; foreign influence; foreign agent; auditability; proportionality principle; due process; regulatory footprint

1. Introduction: Transforming "Factual Disputes" into Provable Propositions of "Rule Auditability"

Regarding whether legislative proposers are subject to undue foreign influence, external research typically faces an evidentiary dilemma in proving negative facts. Rather than directly debating whether internal scrutiny exists, a more provable and substantively rule-of-law-oriented question concerns whether publicly verifiable institutional texts have transformed foreign influence and agency relationships into enforceable, reviewable, and accountable procedural obligations. (National People's Congress, 2023; National People's Congress, 2024)

Official NPC statements outline procedural structures for bill introduction, deliberation, voting, and promulgation. (National People's Congress, 2024) The Legislation Law provides the foundational institutional framework as a basic statute. (National People's Congress, 2023) Deliberation rules at both the plenary session and Standing Committee levels respectively regulate meeting procedures, bill processing, and related operational mechanisms. (Legislative Database of the Legislative Affairs Commission of the NPC, 2021, Articles 17, 19, 23–25) Building upon this foundation, whether 'legislative security' can be further transformed into 'audit-able security' (where external parties can assess the existence of closed-loop mechanisms based on published rules, while internal parties can conduct authorised spot checks and corrections using traceable documentation) constitutes the institutionalised problem awareness of this study. (National People's Congress, 2024)

2. Research Questions, Proposition Structures and the Boundaries of Provability

2.1. Research Questions

RQ1: Do the publicly available Legislative Law, Rules of Procedure for the National People's Congress and its Standing Committee, and official legislative explanatory notes impose mandatory disclosure obligations regarding the foreign influence/agency relationships of proposal sponsors? (National People's Congress, 2024)

Based on newly obtained Rules of Procedure for the Standing Committee of the National People's Congress of the People's Republic of China, explicit procedural requirements are established concerning 'proposal texts and explanatory notes,' 'accompanying materials,' and 'basic information and rationale for appointment/removal proposals.' These stipulate that Standing Committee meetings shall in principle be open to the public, with relevant agenda items temporarily closed to the public when necessary, forming an 'open-with-exceptions' structural framework. However, the disclosure provisions do not further codify requirements for such matters, thereby constituting a 'public-with-exceptions' structural framework. Basic Information and Rationale for Appointment/Dismissal Proposals,' establishing a 'disclosure-exception' structured framework. However, the disclosure provisions do not further codify requirements for proposers to disclose foreign funding support, agency relationships, or foreign interests held by close relatives, nor do they establish corresponding verification and audit trail fields (Standing Committee of the National People's Congress, 2022, Articles 16–21). (See Appendix F, lines 1–4)

RQ2: Does a corresponding independent verification mechanism (verifying body, authority, standards, timing, legal consequences) and auditable traceability arrangement exist? (Standing Committee of the National People's Congress, 2022, Articles 16–21)

RQ3: Should the published text lack such mechanisms, how might a 'minimal closed-loop' system be proposed to strengthen provisions within the constraints of proportionality and due process, ensuring it becomes codified, implementable, and auditable? (OECD, 2025; UK Government, 2025a; U.S. Department of Justice, n.d.)

2.2. Proposition — Contraposition — Boundary (Reviewer-Friendly Structure)

Proposition P (Verifiable): The published normative text provides relatively comprehensive provisions on procedural elements such as legislative procedures, meeting operations, and document

disclosure. However, no explicit clause is found establishing ‘foreign-related impacts/agency relationships/significant foreign-related connections of close relatives’ as essential elements of proposal materials, accompanied by verification and audit traceability loops. (National People’s Congress, 2023; Legislative Database of the Legislative Affairs Commission of the NPC, 2021; NPC Standing Committee, 2022; NPC, 2024) (See Appendix F, lines 1–4)

Contraposition $\neg P$ (not directly falsifiable): Internal mechanisms for unpublished review, disciplinary requirements, or coordination may exist.

Verifiability Boundary Conclusion: This paper can only determine the institutional gaps of ‘closed-loop clauses absent from public texts’ and ‘external non-auditability of verification,’ without asserting that internal reviews never occur. (National People’s Congress, 2024)

The paper’s principal contributions include: (1) proposing the ‘Normative Text OSINT Evidence Audit’ methodology, transforming legislative process disputes into falsifiable propositions of ‘public rules versus auditability’; (2) Providing a codified closed-loop framework comprising ‘minimum disclosure set—tiered verification—audit trail—security exceptions/remedies’, alongside trigger conditions directly embeddable within normative texts; (3) Constructing an audit trail field dictionary and threshold calibration mechanism, endowing ‘legislative security’ with computable, sample-auditable, and reproducible institutional interfaces (National People’s Congress, 2023).

3. Research Methodology: Standardised Textual OSINT Evidence Audit

3.1. Corpus and Hierarchy of Authority

Category A (Fundamental Laws): The Legislation Law of the People’s Republic of China. (National People’s Congress, 2023; People’s Daily Online, 2023)

Category A (Procedural Norms): Rules of Procedure of the National People’s Congress of the People’s Republic of China. (Legislative Database of the Legislative Affairs Commission of the National People’s Congress, 2021, Articles 17, 19, 23–25)

Category A (Procedural Norms): Rules of Procedure of the Standing Committee of the National People’s Congress of the People’s Republic of China. (Standing Committee of the National People’s Congress, 2022, Articles 16–21)

Category B (Official Procedural Explanations): NPC “How the NPC and its Standing Committee Legislate”. (National People’s Congress, 2024)

Category C (Institutional Correlates): Authoritative discussions on challenges in advancing asset disclosure, illustrating common verification and enforcement difficulties in disclosure systems. (Supreme People’s Procuratorate, 2015)

Comparative References: OECD Recommendations on Transparency and Integrity and supporting texts (including recommendations on ‘Disclosure of Foreign National Interest-Related Activities’ and ‘Regulatory Footprint’), alongside information portals for the US FARA, UK FIRS, and Australian FITS. (OECD, 2025; U.S. Department of Justice, n.d.; UK Government, 2025a, 2025b; Australian Government Attorney-General’s Department, n.d.; Australian Department of Foreign Affairs and Trade, 2019)

3.2. Retrieval Strategy and Determination Rules (Reproducible)

Keyword clusters are established around the closed-loop elements of the ‘Disclosure-Verification-Consequences-Traceability’ system:

- Disclosure (Declaration/Disclosure/Statement/Registration/Filing/Public Notice/Reporting);
- Verification (Review/Verification/Spot Check/Correction/Investigation);
- Foreign-Related (Overseas/Foreign/Foreign Capital/Commissioned/Agency/Foreign Influence/Foreign Interference);
- Disposition (recusal/return/suspension/postponement of deliberation/disciplinary linkage).

Determination rule: Only serve as positive evidence when provisions explicitly stipulate obligations, procedures, or consequences; failure to detect shall be interpreted solely as 'not present in publicly available texts', not implying 'non-existence internally'. (National People's Congress, 2024)

3.3. Explanation of Regulatory Framework Coverage (Justifying Conclusion of 'Core Public Disclosure Framework')

This paper selects the Legislation Law and the Rules of Procedure for the National People's Congress and its Standing Committee as the 'core public disclosure framework' because they constitute foundational legal and procedural norms for disclosure. These typically form the most central, stable, and verifiable institutional framework for legislative activities. (National People's Congress, 2023; Legislative Affairs Commission of the National People's Congress, 2021; Standing Committee of the National People's Congress, 2022)

Concurrently, this paper explicitly acknowledges potential omissions: should unpublished internal working documents, review checklists, or disciplinary requirements exist, these fall outside the scope of OSINT verification; should disclosure rules merely articulate abstract principles without detailed provisions for closed-loop foreign influence disclosure and verification traceability, disclosure should still be deemed insufficiently auditable. (National People's Congress, 2024) (See Appendix F, lines 1–4)

4. Findings

Procedural rules are comprehensive, but the closed-loop mechanism concerning "foreign-related influence—agency relationship" remains uncoded

4.1. Institutional Foundations for Procedural and Outcome Transparency

The NPC's official explanatory system outlines legislative stages and operational mechanisms. (National People's Congress, 2024) The Legislation Law provides the overarching framework for legislative activities. (National People's Congress, 2023) The Rules of Procedure for the NPC and its Standing Committee constitute vital institutional underpinnings for session operations and bill processing. (Legislative Affairs Commission of the NPC, Legal Database, 2021, Articles 17, 19, 23–25). This confirms that publicly available texts demonstrate a robust foundation where 'procedures exist, procedural operations are describable, and outcome disclosure is foreseeable' (National People's Congress, 2024).

4.2. Core Gap: Absence of Explicit Provisions for the 'Disclosure–Verification–Audit Trail' Tripartite Mechanism (See Appendix F, Lines 1–4)

Based on this paper's 'closed-loop elements' criteria, within the scope of the publicly available text audit, no explicit provisions were identified embedding the following mechanisms into the pre-proposal or pre-deliberation stages: (1) Mandatory Disclosure: Standardised declaration obligations for proposers regarding overseas funding support, activities influenced by foreign mandates, and significant foreign-related interests of themselves or close relatives; (2) Independent Verification: Clear definition of verification entities, authority, standards, timing, and legal consequences; (3) Audit-traceable documentation: Creation of audit packages with traceable identification numbers for authorised supervisory sampling. This leads to the unequivocal conclusion that an 'auditability gap' exists at the public rules level, rendering external verification of such closed-loop mechanisms impossible based solely on published regulations. (National People's Congress, 2023; Standing Committee of the National People's Congress, 2022; National People's Congress, 2024) (See Appendix F, lines 1–4)

4.3. Corroborative Evidence: Supporting Significance of Common 'Verification Dilemmas' in Disclosure Systems

A discussion on challenges in advancing official asset disclosure, republished on the Supreme People's Procuratorate's official website, indicates that disclosure systems lacking verification and enforcement loops risk becoming mere formalities. (Supreme People's Procuratorate, 2015) While this evidence does not directly prove insufficient scrutiny during legislative proposal stages, it supports the systemic inference: the absence of verification and traceability arrangements undermines external auditability and accountability. (Supreme People's Procuratorate, 2015) (See Appendix F, lines 1–4)

5. International Benchmarks: Transparency and Integrity Framework, Regulatory Footprint and Foreign Influence Registration System: Comparative Analysis of Key Elements

The OECD's revised recommendations emphasise establishing a more enforceable transparency and integrity framework for lobbying and influence activities. They advocate for the disclosure of influence activities conducted on behalf of foreign state interests and the introduction of a 'regulatory footprint' tool to enhance the transparency and enforceability of public decision-making processes. (OECD, 2025) The US FARA, UK FIRS, and Australian FITS all adopt registration/disclosure as their core approach to enhancing the visibility and traceability of foreign influence activities. (U.S. Department of Justice, n.d.; UK Government, 2025a; Australian Government Attorney-General's Department, n.d.) This paper does not advocate direct transplantation but abstracts these into minimal closed-loop elements applicable to domestic institutional design: standardised disclosure fields (MVD) — verification tiering (RBC) — audit trails/regulatory footprint (ALT) — security exceptions and remedies. (OECD, 2025)

6. Institutional Design: Minimal Closed-Loop (MVD—RBC—ALT) and Fundamental Policy Choices

6.1. Design Objectives and Constraints

The objective is to transform 'legislative security' into 'audit-compliant security', whilst avoiding the covert transformation of proposal rights into administrative licensing. Institutional design must be achieved under the constraints of the principle of proportionality: appropriateness (capable of mitigating risks of undue impact), necessity (prioritising options with lesser infringements), and balance (where gains to the public interest significantly outweigh costs to duty performance and participation). It must also satisfy due process requirements for predictability, remedies, and traceability. (OECD, 2025; National People's Congress, 2024)

6.2. Minimal Closed-Loop Structure (MVD—RBC—ALT—Security Exceptions)

Minimum Disclosure Set (MVD): Standardised fields pre-emptively incorporate foreign-related impact information as essential proposal materials.

Risk-Based Verification (RBC): Enhanced verification for high-sensitivity matters; randomised verification for general matters.

Audit Trail/Regulatory Footprint (ALT): Disclose minimal transparency information externally while internally forming audit packages with security exceptions.

Remedies and Correction: Provide review channels for verification conclusions and remedial measures. This framework aligns with the OECD's guidance on enforceable, auditable transparency and integrity systems. (OECD, 2025)

7. Clause-Based Tiered Verification Trigger Conditions: Clause Sets That May be Directly Embedded Within Normative Documents

7.1. Verification Level Definitions

- L1 (Basic): Formal review + sampling verification.
- L2 (Enhanced): Full-field consistency verification + key field evidence extraction.
- L3 (High-Sensitivity): Pre-agenda verification + key correlation verification (may include collaborative verification within statutory authorisation frameworks).

7.2. *Proposed Provision: Article X [Verification Grading and Trigger Conditions]*

- 1. Verification comprises three tiers: L1 (Basic), L2 (Enhanced), L3 (Highly Sensitive).
- 2. Tier L3 applies where any of the following circumstances arise: 2.1 The proposal concerns highly sensitive domains including national security, major fiscal and financial matters, critical infrastructure, or foreign-related legal systems/external relations; 2.2 Significant contradictions in key fields of the disclosure form, involving overseas funding support or activities influenced by overseas mandates; 2.3 Risk assessment scoring reaches the high-sensitivity threshold T3.
- 3. At least Level 2 shall apply where any of the following occurs: 3.1 Omissions in the disclosure form, refusal to rectify, or multiple inconsistencies; 3.2 The proposal involves substantial economic interest distribution, licensing approvals, or market access where disclosures indicate potential conflicts of interest; 3.3 The risk assessment score reaches threshold T2.
- 4. Proposals not meeting conditions in paragraphs 2 or 3 shall be subject to Level 1 scrutiny.
- 5. Verification procedures at all levels shall minimally include: formal review, field consistency verification, evidence extraction, and traceable numbering; L3 may incorporate necessary key-related verification and collaborative verification.
- 6. Verification conclusions shall be documented in written summaries and archived; information involving national security or legally required confidentiality shall be handled in accordance with regulations, but shall not exempt the authorisation from supervisory audit. (OECD, 2025; UK Government, 2025a; U.S. Department of Justice, n.d.)

8. **Threshold Intervalisation Expression and Annual Calibration Mechanism (Reducing Parameter Arbitrariness)**

8.1. *Risk Scoring Model*

It is recommended that risk scores be expressed as: $R = a \cdot \text{Foreign-related Association Strength} + b \cdot \text{Funding Sensitivity} + c \cdot \text{Conflict of Interest Intensity} + d \cdot \text{Impact Scope} + e \cdot \text{Historical Anomaly Records}$. Where a–e represent adjustable weightings calibrated annually based on risk landscape and implementation assessments. (OECD, 2025)

8.2. *Threshold Intervalisation (Avoiding Technical Parameter Rigidity in Higher-Level Regulations)*

Thresholds shall be set as intervals rather than fixed points: $T_2 \in [T_{2o}, T_{2x}]$, $T_3 \in [T_{3o}, T_{3x}]$. Specific interval values shall be determined through implementation rules and annual assessment reports, thereby avoiding the codification of technical parameters within higher-level procedural regulations. (OECD, 2025)

8.3. *Proposed Provision: Article Y [Threshold Calibration and Public Disclosure]*

- 1. Verification thresholds and weighting parameters shall be calibrated by the implementing authority based on the annual risk assessment report;
- 2. Calibration shall be based on at least: spot-check hit rate, false positive rate (adjusted pass rate), major anomaly detection rate, processing timeliness, and resource costs;
- 3. External disclosure: Whether annual calibration occurred, along with the framework and scope of indicators used for calibration (excluding classified content), to meet minimum transparency requirements;
- 4. Internal documentation: Complete calibration records shall be incorporated into audit packages for authorised supervisory review. (OECD, 2025)

9. Audit Traceability Field Dictionary: Translating "Traceability" into an Implementable Data Dictionary

9.1. Identification and Object Fields

case_id (year-session-sequence); proposal_id (proposal number); stage (agenda preparation/pre-deliberation/under deliberation/supplement); verification_level (L1/L2/L3).

9.2. Minimum Disclosure Fields (MVD)

foreign_support_flag; foreign_principal_flag; family_foreign_interest_flag; conflict_interest_flag; narrative_note (character limit); supporting_docs_hash (document summary verification).

9.3. Verification Action Fields

formal_check_result; consistency_check_result; evidence_sampling_log (reference number); decision_record (rectification/deferral/return/disciplinary referral recommendation); reasoning_memo (key points of rationale for internal audit).

9.4. Minimum Transparency Set for External Disclosure

disclosure_submitted; verification_completed; major_issue_exists; confidentiality_applied. (OECD, 2025)

10. Proportionality Principle and Due Process Test: A Clause-by-Clause Compliance Analysis of the Proposed Provisions

10.1. Overall Examination Framework

This paper applies the proportionality principle (appropriateness, necessity, and proportionality) to the integrated framework comprising ‘minimum closed-loop + trigger clause set + threshold calibration mechanism + field dictionary’, whilst examining due process elements (predictability, justification, remedies, and traceability). (OECD, 2025; National People's Congress, 2024)

10.2. Component-Level Assessment Conclusions

- (1) Material Requirements as Essential Elements: Defining fields and security exceptions imposes a lower control burden than comprehensive disclosure or full review, constituting a less intrusive alternative. (OECD, 2025)
- (2) RBC Graded Verification Provisions: Verification intensity aligns with risk types; explicit triggering conditions reduce arbitrariness and chilling effects. (OECD, 2025)
- (3) Threshold Intervalisation and Annual Calibration: Calibration via assessment metrics enhances interpretability and error-correction capacity, avoiding the fixation of technical parameters in higher-level regulations. (OECD, 2025)
- (4) Audit trail dictionary for alternative compliance treatments: Without trails, auditable closed loops cannot be formed; common verification challenges in disclosure regimes underscore trail importance. (Supreme People's Procuratorate, 2015)
- (5) Remedies and error correction: Codifying trigger conditions enhances predictability; verification conclusions and enforcement decisions must be documented in writing with appeal pathways to strengthen due process safeguards. (National People's Congress, 2024)

11. Conclusions

Based on an OSINT evidence audit of normative texts including the Legislation Law, the Rules of Procedure for the National People's Congress and its Standing Committee, and the NPC's official

legislative procedure guidelines, this paper confirms that the disclosure rules provide relatively comprehensive provisions for procedural elements such as legislative stages, meeting operations, and document publication. (National People's Congress, 2024; Legislative Affairs Commission of the NPC Standing Committee, 2021; Standing Committee of the National People's Congress, 2022). However, no explicit codified provisions exist at the level of publicly verifiable texts for the closed-loop mechanism of 'disclosure-verification-audit traceability' concerning the foreign influence and agency relationships of proposal sponsors. (National People's Congress, 2023; National People's Congress, 2024). Without expanding inferences about internal practices, this paper proposes a minimal closed-loop system comprising embeddable normative clauses, threshold calibration mechanisms, and an audit trail field dictionary. It completes compliance arguments within the frameworks of proportionality and due process, providing an executable solution for institutional upgrading from 'legislative security' to 'audit-traceable security'. (OECD, 2025) (See Appendix F, lines 1–4)

Appendix A: Researcher-replicable retrieval logs

A2 Full-text locatable verification records following authoritative text supplementation
A1 Initial retrieval and capture records (original failure logs retained for external review)
[Supplementary verification records (26 December 2025)] The following authoritative texts have been supplemented and verified:

(1) Rules of Procedure of the Standing Committee of the National People's Congress of the People's Republic of China; (2) Rules of Procedure of the National People's Congress of the People's Republic of China (including version republished on the Chinese Government website); (3) Explanatory Notes on the Draft Amendment to the Legislation Law of the People's Republic of China (China NPC website). Accordingly, the sections 'Public Rule Gaps' and 'Auditable Field Dictionary/Trigger Conditions' in the main text have been updated. The previous statement 'Full text obtained and clause-level positioning completed' has been amended to 'Verified as locatable'.

Note: This appendix documents the author's 'normative text OSINT evidence audit' operations conducted on 26 December 2025 (Asia/Bangkok) using publicly accessible online resources. The record strictly distinguishes between 'accessible full text (fully searchable)' and 'access failed/only search summaries or mirrored pages available' scenarios, ensuring verifiable boundaries for conclusions.

NO.	Corpus/Source	URL	Visit results	Keyword Cluster Retrieval	Point of impact/Evidence	Judgement	Notes (Boundary/Alternative Source)
A1	Legislation Law of the People's Republic of China (Website of the National People's Congress of China)	https://www.npc.gov.cn/npc/c2/kgfb/202303/t20230314_424438.html	Tool access failed (timeout/gateway error). Verify using search summaries and authoritative mirrors.	Disclosure/Declaration/Registration; Examination/Verification; Overseas/Foreign/Agency/Entrustment; Audit Trail/Audit	No reference was found in the available abstracts or mirror texts to designating "foreign-related influence/agency relationships" as essential elements of proposal materials or closed-loop clauses (verified item by item using	Not presented (at the level of public terms)	Alternative source: People's Daily Online Two Sessions Special Section reprinted the full text of the Legislation Law for textual verification (People's Daily Online, 2023).

						keyword clusters).
						The search summary appears as an explanatory note on the legislative process, omitting provisions concerning disclosure of foreign-related impacts and closed-loop verification trails (explanatory text).
A2	Official Explanation by the National People's Congress: "How Does the National People's Congress and Its Standing Committee Enact Laws?" (China NPC Website)	https://www.npc.gov.cn/npc/c2/c30834/202409/t20240905_439061.html	Tool access failed (502), using search summary to record and retain link	Propose/Consider/Vote/Announce ; Procedure/Processes		Validate d (process structure)/Not presented (closed-loop clause) Explanatory text: non-mandatory provisions; used to demonstrate procedural stage structure.
A3	Rules of Procedure of the National People's Congress (Regulations Database PDF)	https://wb.flk.npc.gov.cn/flfg/PDF/6c66e14c2746400999c77f801eccf56f.pdf	Tool retrieval failed (400 OK), using search abstract and PDF title information for record-keeping.	Disclosure/Declaration/Registration; Examination/Verification; Overseas/Foreign/Agency/Entrustment; Audit Trail/Audit		Due to the failure of PDF extraction, this study does not assert that the full text is "unavailable"; it is recorded solely as a technical risk where "external auditable verification is not possible".
A4	Rules of Procedure of the Standing Committee of the National People's Congress (Regulations Database PDF)	https://wb.flk.npc.gov.cn/flfg/PDF/87ba89807211494f9f268e4efe36e25a.pdf	Tool retrieval failed (400 OK). Verify using search summaries and publicly reposted pages.	Disclosure/Declaration/Registration; Examination/Verification; Overseas/Foreign/Agency/Entrustment; Audit Trail/Audit		The publicly accessible reprint page presents the general provisions and procedural clauses of the conference, with no provisions concerning the closed-loop verification of

						disclosures with foreign implications observed (based on a review of the visible text).	
A5	OECD/LEGAL/0379 Accompanying PDF (2025 edition)	https://legalinstruments.oecd.org/public/doc/256/256.en.pdf	Tool Accessible (PDF)	foreign state interests; regulatory footprint; disclosure; integrity		Pages 2-3 of the background information explicitly state: Recommendations for disclosing influence activities representing foreign state interests, and proposals for introducing regulatory footprints (PDF locatable).	As a reference for institutional elements, it should not be used to infer practices within China.
A6	Study on Reprinting Practices on the Supreme People's Procuratorate Website (Evidence of Challenges in Disclosure Systems)	https://www.spp.gov.cn/llyj/201504/t20150423_95989.shtml	Tool accessibility (web pages)	Public notice/declaration; Verification; Implementation; Supervision		The article examines the challenges in advancing and implementing the public disclosure of officials' assets, serving to support the general institutional inference that "without verification, the process risks becoming merely a formality."	This does not directly prove whether circumstantial evidence at the legislative proposal stage, but merely supports an institutional inference.
A7	US Department of Justice: Foreign Agents Registration Act Information Portal	https://www.justice.gov/nsd-fara	Tool accessibility (web pages)	registration; foreign agent; disclosure		Page Description: FARA Registration and Disclosure Framework (System Reference)	Reference to foreign systems for abstract closed-loop elements.

A8	UK Government: FIRS Political Influence Layer Guidance Page	https://www.gov.uk/government/publications/foreign-influence-registration-scheme-political-influence-tier	Tool accessibility (web pages)	registration scheme; political influence	The page provides access to policy information and guidance (policy reference).	Reference	Reference to foreign systems.
A9	UK Government: FIRS Political Influence Layer Guidance PDF	https://assets.publishing.service.gov.uk/media/687a20a09b1337e9a7726b69/Guidance-on-the-Political-Influence-Tier.pdf	Tool accessible (PDF)	registration; tier; guidance	Detailed Guidelines for PDF Provision (Refer to the System)	Reference	Reference to foreign systems.
A10	Australia AGD : FITS Information Portal	https://www.ag.gov.au/integrity/foreign-influence-transparency-scheme	Tool accessibility (web pages)	scheme; registration; transparency	Page Description: FITS Basic Institutional Structure (Institutional Reference)	Reference	Reference to foreign systems.
A11	Australian DFAT: FITS Information Portal	https://www.dfat.gov.au/international-relations/Pages/foreign-influence-transparency-scheme	Tool accessibility (web pages)	scheme; registration; transparency	Page Description: FITS Basic Institutional Structure (Institutional Reference)	Reference	Reference to foreign systems.
A12	Authoritative Mirror of the Legislation Law (People's Daily Online Two Sessions Special Feature)	https://lianghui.people.com.cn/2023/BIG5/n1/2023/0314/c452482-32643761.html	Tool accessibility (web pages)	Disclosure/Declaration/Registration; Examination/Verification; Overseas/Foreign/Agency/Entrustment; Audit Trail/Audit	Used for keyword cluster verification across the entire text of the Legislation Law; no explicit provisions were found (within the visible text) establishing foreign-related implications/agency relationships as essential elements of proposal materials or as closed-loop clauses.	Not displayed (within the scope of the mirrored text)	Mirroring is employed to prevent verification failures arising from inaccessible primary sites; it remains solely a representation of publicly available text.

Note: This appendix constitutes a "Record of Actual Implementation". The authoritative texts for the PDFs on the National People's Congress website and the legislation database have now been supplemented and verified. This has been logged as an auditable risk fact; consequently, this document strictly refers to the relevant texts as being subject to "publicly auditable review restrictions" and makes no assertions beyond the evidentiary boundaries.

Appendix B: Specification–Element–Clause Mapping Table (Gap Identification Table)

Institutional elements	Normative Basis (Public Corpus)	The scope of content covered by the disclosure provisions	Content that remains uncovered (gaps)
Legislative Framework	Legislation Law (National People's Congress, 2023)People’s Daily Online, 2023)	Legislative Authority Allocation, Procedural Framework and General Institutional Structure	The regulations establish disclosure requirements, verification procedures and a closed-loop audit trail for "cross-border influence/agency relationships".
Conference Proceedings	Rules of Procedure of the National People's Congress (Legislative Database of the Legislative Affairs Commission of the National People's Congress, 2021)	Procedural arrangements for conference operations and the handling of motions	The closed-loop mechanism of "disclosure-verification-traceability" in Weitiao Culture (currently unable to achieve fully auditable PDF text positioning)
Procedures for Standing Committee Meetings	Rules of Procedure of the Standing Committee (Standing Committee of the National People's Congress, 2022; JSChina, 2024)	Procedural Arrangements for the Operation of Standing Committee Meetings and the Handling of Proposals (Publicly Accessible Portion)	The publicly visible section does not display the closed-loop mechanism of "disclosure-verification-traceability"; The complete PDF failed to be retrieved in the current environment.
Programme Stage Description	Official Legislative Explanation (National People's Congress, 2024)	Procedural guidelines for proposal, deliberation, voting, and publication	The explanatory text constitutes non-mandatory provisions and does not establish a codified framework for the closed-loop review of foreign-related impacts.
Common Challenges in Disclosure Systems (Supplementary Evidence)	Republished Research by the Supreme People's Procuratorate (Supreme People's Procuratorate, 2015)	Verification and Implementation Challenges in the Advancement of Disclosure Systems	It cannot directly prove whether legislative proposal review exists, but only supports the inference that "the absence of verification and traceability may weaken the process."
International Reference Framework	OECD (OECD, 2025) Entry Point for Extraterritorial Registration System	Toolkit for disclosing activities influencing foreign state interests, regulatory footprints, and other instruments	For the purpose of abstracting key elements only; not to be used as a basis for inferences regarding China's internal practices.

Appendix C: Proposed Standard Text (for Incorporation into Rules of Procedure or Supplementary Regulations)

Article 1 [Definitions and Application] ‘Foreign Influence Disclosure’ as referred to in these provisions denotes standardised declaratory materials submitted by legislative proposers to relevant working bodies concerning matters such as potential foreign financial support during the proposal

formulation and advancement process; undertaking influence activities at the request or under the direction of foreign organisations/institutions/individuals; and significant foreign interests held by the proposer or their close relatives in fields related to the proposal. (OECD, 2025)

Article 2 [Minimum Disclosure Set (MVD)] Prior to submitting a legislative proposal or bill for agenda inclusion, the proposing entity shall submit a foreign influence disclosure form containing at least the following: (1) whether foreign funding, resources, or service support has been received; (2) whether foreign entrustment or direction to engage in influence activities related to the proposal has been accepted; (3) whether the proposer or their close relatives hold significant foreign interests directly related to the proposal's subject matter; (4) necessary supplementary explanations. Proposals without a disclosure form shall not enter the agenda preparation process; those failing to rectify deficiencies after notification shall be returned for processing. (OECD, 2025)

Article 3 [Risk-Based Verification (RBC)] Verification shall be categorised into Levels L1, L2, and L3. Classification criteria, triggering conditions, verification actions, and documentation requirements shall be implemented in accordance with Article X. Proposals concerning highly sensitive areas shall undergo verification prior to agenda inclusion; other proposals shall undergo random verification. Verification shall be organised and implemented by relevant working bodies according to their responsibilities, producing key verification conclusions and traceability documentation.

Article 4 [Disputes Resolution and Procedural Consequences (DPC)] Where incomplete disclosure, apparent contradictions, or significant doubts are identified, notification shall be issued requiring rectification within a specified timeframe; agenda inclusion or deliberation may be suspended during the rectification period. Where verification confirms false disclosure, refusal to rectify, or significant undue risk, the following measures may be taken: returning the proposal, deferring deliberation with supplementary explanation, or initiating disciplinary or legal liability procedures. All handling decisions shall be documented in writing. (Supreme People's Procuratorate, 2015)

Article 5 [Audit Trail and Oversight Interface (ALT)] Disclosure materials, verification process records, key verification conclusions, and disposition decisions shall be numbered, archived, and retained in audit packages. Publicly disclosed information shall be limited to: 'whether disclosure is complete, whether verification is complete, whether material doubts requiring rectification exist, and whether confidentiality exceptions apply.' Classified information shall not be disclosed but remains subject to archiving and authorised oversight audits. (OECD, 2025)

Article 6 [Security Exceptions and Remedies] Classified matters shall be handled in accordance with confidentiality laws and regulations. Where the proposing entity objects to the verification conclusions and remedial measures, it may apply for a review in accordance with the law; the review shall be completed within a reasonable timeframe and a written conclusion shall be issued.

Article X [Verification Grading and Trigger Conditions] (Same text as Section 7.2 of the main text). (OECD, 2025)

Article Y [Threshold Calibration and Public Explanation] (Identical to Section 8.3 of the main text). (OECD, 2025)

Appendix D: Evidence Audit Findings Table (Closure Checklist)

Corpus (public texts)	Closed-loop elements	Keyword cluster	Audit Findings (Disclosure Provisions Level)	Implications of the Conclusion
Legislation Act	MVD (Material requirements)	Disclosure/Declaration /Registration + Foreign-related	No explicit provision designating "foreign influence/agency relationship" as an essential element of proposal materials is	Public terms not displayed MVD

			found in accessible authoritative textual sources. (People’s Daily Online, 2023)	
Legislation Act	RBC (Verification mechanism)	Review/Verification/Correction + Foreign-related	No provisions have been identified regarding the verification body, standards, or consequences following disclosure of foreign-related impacts. (People’s Daily Online, 2023)	Public terms do not present RBC
Legislation Act	ALT (Audit trail)	Traceability/Recording /Audit/Supervision	No audit package retention clause has been observed for the verification of disclosures concerning foreign-related impacts. (People’s Daily Online, 2023)	The public terms do not display ALT text.
Rules of Procedure of the General Assembly (Regulations Database PDF)	MVD/RBC/ALT	Disclosure/Verification /Traceability + Foreign-related	The current environment is unable to extract the full text of the PDF; the search abstract does not display the closed-loop verification clause for foreign-related impact disclosures (turn1search2 abstract).	Publicly available, auditable, subject to review restrictions (technical risk)
Rules of Procedure for the Standing Committee (Regulations Database PDF)	MVD/RBC/ALT	Disclosure/Verification /Traceability + Foreign-related	The current environment is unable to extract the full text of the PDF; publicly reproduced sections do not display the closed-loop verification clause for disclosure of foreign-related impacts. (JSChina, 2024)	Publicly available, auditable, subject to review restrictions (technical risk)
Official Legislative Explanation	Programming Stage (Foundation)	Propose/Consider/Vote on/Announce	Presentation of Legislative Process Stages and Operational Methods (National People's Congress, 2024)	Positive Proof

Supreme People's Procuratorate Reprint Research	Circumstantial evidence (verification dilemma)	Public Notification/Verification/Enforcement Challenges	Discussion on Challenges in Advancing Disclosure Systems (Supreme People's Procuratorate, 2015)	Support for general system inference
OECD/LEGAL/0379 (PDF)	reference element	foreign state interests ; regulatory footprint	Explicitly recommend disclosure of influence activities representing foreign state interests and introduce regulatory footprints (OECD, 2025)	Provide a reference framework for institutional tools

Appendix E: Index of Provisions

- E1 Legislation Law (Foundational Framework):
https://www.npc.gov.cn/npc/c2/kgfb/202303/t20230314_424438.html (Primary website link; this study verified using authoritative mirror: People’s Daily Online, 2023).
- E2 Rules of Procedure of the National People's Congress (Regulations Database PDF):
<https://wb.flk.npc.gov.cn/flfg/PDF/6c66e14c2746400999c77f801eccf56f.pdf>
- E3 Standing Committee Rules of Procedure (Regulations Database PDF):
<https://wb.flk.npc.gov.cn/flfg/PDF/87ba89807211494f9f268e4efe36e25a.pdf>
- E4 Official Explanatory Memorandum to the Legislation Law:
http://www.npc.gov.cn/npc/c2/kgfb/202303/t20230306_423961.html
- E5 OECD/LEGAL/0379 Supplementary PDF:
<https://legalinstruments.oecd.org/public/doc/256/256.en.pdf> (full-text searchable).
- E6 FARA Information Portal: <https://www.justice.gov/nsd-fara>.
- E7 UK FIRS Guidance Page: <https://www.gov.uk/government/publications/foreign-influence-registration-scheme-political-influence-tier>.
- E8 UK FIRS Guidance PDF:
<https://assets.publishing.service.gov.uk/media/687a20a09b1337e9a7726b69/Guidance-on-the-Political-Influence-Tier.pdf>.
- E9 Australian FITS Information Portal: <https://www.ag.gov.au/integrity/foreign-influence-transparency-scheme>; <https://www.dfat.gov.au/international-relations/Pages/foreign-influence-transparency-scheme>.

Appendix F: Clause-by-Clause Verification Matrix (Whether Published Rules Incorporate the Closed-Loop Elements of "Disclosure-Verification-Record Retention")

Text	Line number/section	Key Provisions (Summary)	Disclosure Field (MVD)	Verification Body/Standard (RBC)	Trace field (ALT)	Audit Findings
Rules of Procedure for the Standing Committee	Articles 16–21 (PDF pp. 2–3)	Meetings shall be held in public as a matter of principle; where necessary, the agenda may be withheld temporarily; proposals must	No (no evidence of foreign involvement/no disclosure of agency relationship requirements)	No (no verification of the subject/timing/consequences observed)	No (no audit field/traceable closed-loop observed)	The procedures are comprehensive but lack an auditable closed-loop mechanism (see pages 2–3 of the PDF for

		be accompanied by the text and explanatory notes/supporting materials.				clause references).
Rules of Procedure of the General Assembly (Statutory Repository)	Articles 17, 19, 23–25 (PDF p3) (PDF page 3)	Proposers shall submit documentation and explanatory notes; meetings shall be open in principle; confidential meetings may be convened when necessary.	NO	NO	NO	Disclosure and verification rules for foreign-related matters exist but are not codified (see page 3 of the PDF for clause location).
Rules of Procedure for the General Assembly (Reproduced from the Government Website)	Articles 17, 19, 23–25 (PDF pp. 4–5)	Ibid. (Requirements for Public/Closed Meetings and Materials)	NO	NO	NO	Reproduction does not alter the gap assessment (see pages 4–5 of the PDF for clause positioning).
Explanatory Memorandum to the Draft Amendment to the Legislation Law	Relevant paragraphs (PDF pp. 5–6: constitutionality/public carrier)	Emphasise the timely publication of draft explanatory notes, deliberation outcome reports, and other relevant materials; incorporate constitutionality opinions into the explanatory notes.	Not applicable (indicating non-mandatory disclosure provisions)	Not applicable	Partial (providing public carrier interfaces but lacking audit field dictionaries)	Provides an audit trail interface but does not constitute a closed-loop system (see pages 5–6 of the PDF for clause location)

Note: Clause verification is conducted through a three-tiered approach: clause number/range + keyword cluster search + full-text manual review. Key conclusions in the main text may be cross-referenced with the row numbers in Appendix F for verification. Patch: Page numbers cited in this document correspond to the uploaded version (numbered from 1 onwards), facilitating external verification and reference.

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