'Population ecology of interest groups in India – a basis for comparative framework'

Patrycja Rozbicka (Aston University, UK)¹ and Ashwin Patel (King's College London, UK)

The interest groups' population ecology studies have historically been heavily weighted toward Western democracies. Despite being one of the world's largest country and democracy, with established qualitative research on business groups India remains relatively elusive in this field of research. Although, interest groups are recognised elsewhere as an important voice on socio-political matters, our knowledge of interest groups system in India, groups' number and activities, especially post 1991 reforms, is quite limited. Whilst there are individual analyses (e.g. on controversial coal projects and groups participation, or a predominant focus on business associations), their narrative approach to studying advocacy limits the reliability of the results. This article addresses this problem by deploying Western metric framework of studying interest groups population to the analysis of interest groups numbers in India. We test the approach searching for non-governmental organizations (NGOs) in India's environmental policy across three neighbouring states: Chhattisgarh, Odisha & West Bengal. After the deployment of the framework, we elaborate on pitfalls of the approach, lessons we learned and how it can be improved to further facilitate the comparisons, but also to better understand the actors and the dynamics of groups' activities?

Key words: Interest groups, India, environmental regulation

¹ Corresponding author: Patrycja Rozbicka, p.rozbicka@aston.ac.uk; Aston Triangle, B4 7ET Birmingham, UK

Existing studies regarding interest groups density (numbers) and diversity (types) are based on the Gray and Lowery (1996a)'s population ecology of interest representation approach, firmly filling the gap between existing theories of the origins of interest groups and studies of interest groups influence. Those primarily focused on Western democracies (i.e. Naurin and Boräng, 2012; Mohan, 2012; Christiansen, 2012; Gray and Lowery, 2000), or larger conglomerates, like EU (e.g. Beyers et al., 2008). While those are interest groups systems operating somewhere along the classical pluralist-corporatist divide, there is a clear oversight of systems beyond the Western democracies. Gray and Lowery (1996b) argued that to fully grasp conditions of interest groups influence we need to (1) know more about groups' environment (diversity and density of groups competing for limited resources, jurisdictions and policy areas in which they operate) and (2) conduct comparative case studies to fully grasp variations and impact of conditions. As such due to the relative nascence of studies beyond the Western democracies, vast gaps exist within the interest groups' studies. These gaps further perpetuate deficiencies in substantial and in-depth comparisons between systems and lessons that can be learnt. The question is then: how, against the inconsistencies among interest group definitions (Truman 1958; Yoho, 1998: 237; Rozbicka and Mahrenbach, this issue), we can build meaningful comparative frameworks?

As part of the process of reducing the gap, in this article we deploy metrics commonly used in the study of interest groups in the Western democracies to collect the data on interest groups' population ecologies in a Global South state, India in particular, and *ask about pitfalls of the approach, lessons we learned and how it can be improved to further facilitate the comparisons* (RQ)? In the following sections, we firstly explore the scattered research on various aspects of interest groups' system in India. We compare it, when possible, to the systems from the Western democracies to offer context and indicate similarities and differences to keep an eye on when developing comparative framework. Then, we provide an *explanatory* analysis, focused on India's environmental policy and presence of NGOs in Chhattisgarh, Odisha, and West Bengal states, and conduct a detailed review of sources of information and their quality. We conclude with reflection upon findings and how to use them for future developments.

In consideration of the sample size, it would be myopic to utilise or extrapolate the findings from this article as empirically representative of India or environmental interest groups in the broader context. But, the aim is to test the Western style metrics of a more quantitative framework within the system predominantly analysed till date with small N case studies (as is evident from the literature review in the next section). We focus on and inspect how various

factors (i.e. inaccuracies of the registries, available information on online and offline presence) may potentially impact the comparisons between various interest groups systems and their population ecologies. As indicated above, we focus only on one aspect of interest groups studies, prioritising concentration on density of interest groups population in a given system and issues with data collection in that regard. The article does not engage in interest groups' influence measurement nor interest groups' impact on India's environmental policy. The analysis and conclusions presented in this study focus on a step which takes place before impact research and pre-empts problems which can occur in the analysis of the whole influence production process (Lowry and Gray, 2004).

'Searching' for environmental interest groups in India in comparison to the West

With over 1.4bn citizens (~18% of the global population; UN 2023) and the 5th largest economy (IMF 2020), India is an exciting country for any form of analysis, but especially when it comes to interest groups study. Historically, authors estimated that by 1947, there were more than 1500 business and trade groups and over a 1000 labour and peasant unions in India (Yadav, 2008:69). The interest groups system was characterised as plural, heterogenous and insufficiently mobilised (Kochanek, 1987), with the exception of the predominant, limited number of Chambers of Commerce and, using the model of direct lobbying, 75 top business houses (Kochanek, 1996). Dating back to 1950s, the business-state relationship was characterised by the government move towards a public sector dominated by socialist economic strategy (Kochanek, 1995), which later caused business groups pursuing an aggressive strategy of supporting alternative political parties, later undermined by the Indira Ghandi's programme of political and economic centralisation and ban on business contributions for political purposes, leading towards less legal strategies being deployed (Kothari, 1964). Later studies have analysed the patronage politics associated with new entrants into Indian democracy, constituting the 'patronage democracy' (Chandra, 2004). The 1991 reforms, although apolitical having been imposed by IMF, permitted significant changes across sectors (Saha, 2019) and altered the nature and conduct of interest politics in India. There has been an increase in the mobilization, proliferation and transformation of groups and significant changes in business group roles, styles and strategies (Kochanek, 1995). The reforms resulted in the Indian system of state-dominated pluralism, in which autonomous groups were overshadowed by an omnipresent state and interest politics have become less individual, patronclient and particularistic, and more collective, open and genuinely pluralistic. The fundamental division between foreign and indigenous capital has remained, with emergence of a multiplicity of apex organizations representing business and industry in India (Kochanek, 1995).

Going beyond business organizations, existing research on interest groups in India, seemingly appears within a relative state of entropy, with a broad scope of studies from agricultural interest groups in particular regions (Naveen Kumar and Rathakrishnan, 2017), socio-political civil interest groups (Pulla et al., 2019, Rudolph and Rudolph 2012), to examination of types of interest groups such as think-tanks, and their influence on research and public policy (Singh, Sharma and Jha, 2014). The call by Jenkins (1995) and Kochanek (1995) that future research should take account of social change on patterns of political activity is in the process of being answered, more and more civil society organizations, including environmental NGOs, are included in the most recent studies and it is a perfect time to propose a more systematic framework of analysis.

How to approach the study of interest groups population ecology in India?

An initial observation on the interest group system in India is a fact that an 'interest group' is not identified unilaterally as a legal body across the whole state. As noted for example by Naveen Kumar and Rathakrishnan (2017), groups are more commonly found to be solely registered informally, with variations per region. That, in particular, indicates potential barriers in identifying the full population of interest groups, not only the environmental groups, due to the need for extensive regional knowledge.

The issue becomes even more problematic when looking into terminology related to interest groups' activities, in particular when referring to 'lobbying'. As Titus (2007) underlines, in India, lobbying is not yet recognized in a statutory or non-statutory form. The only law that has some relevance to lobbying is Section 7 of the Prevention of Corruption Act (Parliament of India, 1988).² The Act makes it illegal for a public servant taking gratification other than legal remuneration. Thus, the Act associates lobbying with illegal actions and corruption. Interestingly, that feature is not unique to India. Upon reviewing Western political systems, it becomes evident that many EU states have little to no legislation regulating or recording lobbying directly (e.g. Spain and Italy: Rozbicka and Kaminski, 2022), with lobbying widely perceived as a 'negative' activity by the public in some EU countries (Rozbicka et al., 2020).

4

² The Prevention of Corruption Act, 1988. Section.7. Available at: http://legislative.gov.in/sites/default/files/A1988-49.pdf (Accessed: 22 June 2020).

Furthermore, India does not record interest groups in any form of official national database (Saha 2017, 2019), similar to, for example, Australia and Italy which do not have a registry of interest groups (Fraussen and Halpin, 2016) or Lithuania, where a base of the information on interest groups is only a directory of Lithuanian business entities (Šarkutė et al., 2017) that explicitly excludes non-governmental organizations.

Studies examining countries without formal interest groups databases utilise alternative methodological techniques and data sources to capture various interest groups populations and their activities (top-down and bottom-up), both formal and informal. Fraussen and Halpin (2016), for example, used the Directory of Australian Associations, manually verifying listed and relevant organisations to produce a dataset as accurately as possible. Rozbicka and Kamiński (2022) stacked up 3 independent registries of various types of entities in Poland to later manually remove the repetitions, businesses and corporations.

In India, the trend seems to follow that pattern but on a limited scale, both with regard to the type and location of the groups. Taken the size of the state, it has been far more common for existing studies to focus upon particular areas (see for example Teitelbaum, 2006; Goetz and Jenkins, 2001; Kohli & Menon, 2018) rather than the nation as a whole when considering time and resource limitations, as well as when one considers the legal limitations. In a system where lobbying is defined as an impervious activity by law at the national level, focussing efforts on regions to maximise accurate data and findings of 'informal' activities appears to be the most effective approach. The key examples of studies conducted with this approach are: Naveen Kumar and Rathakrishnan (2017) focus on Farmer Interest Groups in Tamil Nadu, Altenburg (2011) who explored interest groups impact on the Biodiesel Policies in 5 particular states, and Mahmood (2016) who analysed trade union, politics and reform in 4 states. The predominant method of analysis are surveys of limited samples of organizations. For example, Teitelbaum (2006) conducted survey of 87 individuals linked with unions and labour movements in Kerala, Maharashtra and West Bengal. Yadav conducted surveys with business associations in India and Brazil (2006), and China (2008). With models using as control groups labour unions (20%) and social and environmental groups (10%), Saha (2017) surveyed 250 firms that eventually gave 146 eligible responses. The most similar to the Western metrics and advanced analysis of business associations has been conducted by Saha (2017) when looking at India's trade policy. The author used the same nomenclature focusing on strategies that business associations deploy while lobbying policies in India and, in particular looked at, lobbying alone or in collations, indicating strong resource dependency explaining the choice.

Despite this spectrum of variation, literature utilising the term interest group or even associated activity such as lobbying predominantly focuses on a small N case studies and does not propose a systematic more encompassing studies that could allow for more generalisability and comparative analysis to the Western systems. Absent of 'official' databases and problematic due to the legal status of lobbying, this further reflects the informal nature and context of interest groups' activity and terminology in India.

Environmental policy and factors impacting numbers of interest groups

When studies on interest groups in India appear and go beyond the business focus, they primarily concentrate on environmental policies, in particular referring to regulations around coal industry (e.g. Ghosh, 2016., Oskarsson and Bedi, 2018., Raj, 2017). As the most explored, this policy area thus poses easiest focus allowing for reliability checks of proposed here framework of analysis.

India has a broad range of environmental legal principles, provisions, and regulations with over 200 laws made for environmental protection (Verma, 2019). While not directly focused on inclusion of various stakeholders (i.e. also interest groups) in the decision-making, there are examples of environmental regulations that have provisions for such an engagement. India adopted the principles of the 1992 Rio Declaration, which focussed upon environmental protection. Principle 10 drew attention to the fact that environmental decisions are best made with the participation of all relevant stakeholders and 'allowing the public to participate meaningfully, promotes governmental accountability' (Shrotria, 2015). However, it is worth noting that it is only characteristic of environmental policy and Goetz and Jenkins (2001) clearly state that horizontal system of accountability in more general is not present in India. Next to national environmental acts and provisions (i.e. Air Act 1981, Water Act 1974 and the Environment Protection Act 1986), India also uniquely incorporates the National Green Tribunal (NGT). It was established in 2010 and is dedicated to dealing with environmental cases, where interest groups can submit letter petitions upon which the Tribunal may choose to act. Additionally, in 2006 the Indian Ministry of Environment, Forest and Climate Change (MoEFCC 2006) implemented a four-stage process to conduct environmental impact assessment of any new projects that includes obligatory public consultations. Public consultations combined with the NGT appear to be the most significant access points within the environmental clearance policy, where relevant interest groups can participate, vocalise and

influence the outcomes (best demonstrated in work by Oskarsson and Bedi, 2018; or, by Shrotria, 2015).

However, a notable trend is that enforcement and governance of environmental regulation nationally is generally poor (CPR, 2016), with community groups thus seeking remedies to fill this void primarily at a regional level (Chatterjee, 2018; Chouhan et al., 2016; and, Birkenholtz, 2009). This is taking place in various regions and indicates a particular avenue in which interest groups operate in India, thus informing the level at which the analysis should focus to better understand population ecology of interest groups in India.

While above examples follow the engagement opportunities outlined in the 1992 Rio Declaration, the degree to which these steps encourage the formation and activities of interest groups within environmental negotiations/regulations remains limited with a number of factors working towards the opposite. State law enforcement action such as military and police presence impacts the space for interest group formation and activity, such as with trade unions and social movements in Chhattisgarh (Miklian, 2011, Sarma, 2006, Tillin 2013, Oskarsson & Bedi, 2018). Notably, this is not an uncommon trend observed across case studies in India, due to the complex relationships between individuals and local authorities. In recent years there have been numerous incidents such as arrests of activists, academics, journalists and individuals critical of actions and aspects of the current governing party, the BJP (*BBC News*, 2021., Soutik, 2021., Abhishek, 2021., *Human Rights Watch.*, 2020). Incidents such as the controversial agriculture bills and retaliatory farmers protests (Bhardwaj, 2021) and arrests of campaigners are indicative of safeguarding concerns individuals and groups may have when considering participation, thus reducing number of openly active interest groups, or indeed even affecting representativeness of collected data.

There is a difficulty in motivating and catalysing definitive collective action and organisation of citizens (CEEUGID, 2009). Already in 2006, Teitelbaum pointed to small level of mobilization within unions and labour movement. Whilst economic disparities are a factor (Shrotria, 2015, Naidu, 2009), it is noted that individuals expect action by institutions of state and political actors rather than themselves (Verma, 2017; Naveen Kumar and Rathakrishnan, 2017; Salifu et al. 2010). This poses an intriguing angle on the role of government in actively catalysing interest group activity; a theme also noted by Knill & Liefferink (2011) within the EU and environmental policies, and thus relevant as a point of analysis and critical comparison.

Further, when in particular referring to the cases within the coal industry regulation, there is a huge disillusion with the process where researchers observed state's consultation processes being bypassed, and local communities and people ignored in processes (CPR, 2016; Oskarsson and Bedi, 2018; Oskarsson et al. 2019; Ghosh, 2016). The interplay between local and international interest groups is complex, with criticisms of mixed motives of international interest groups when representing local people and working with local groups (Kohli and Menon 2016) further reducing engagement of citizens with those and, thus, decreasing numbers of active interest groups that population could be reliably captured.

Finally, the primary methodological model used in studies on the interest engagement in the environmental policy is based on a case study narrative, outlining the interplay and relations between varied, yet limited in number, interest groups directly involved and invested in a regulation or activity related to confronting a negative impact on environment by state and corporate actors. This is evidenced comprehensively by the CPR (2016), which outlines a number of case studies of interest group activity from local community groups such as fishing communities in Morai (area of Valsad district), Sagar Khedu Fisher Folk Association in Okha and the government regulatory body, Gujarat Pollution Control Board. Further case studies demonstrate a range of interest groups operating within the periphery of environmental regulation including local/international activist groups, trade unions, and local agriculture and fishing groups (Ghosh, 2016., Chouhan et al. 2016., Kohli & Menon, 2016). Surprisingly, however, there appears to be no provision of more substantial mapping of the density of interest groups. Without a broader picture we cannot obtain a solid foundation for comparative research.

Methodological challenge

Keeping the above limitations in mind, in this article, we attempt to consolidate data on interest groups for the 3 states in India: Chhattisgarh, West Bengal and Odisha. We are selective due time and resource available. We do not claim that these 3 states are representative of trends present in the whole country. Taken our focus on the environmental policy, we identified them as most relevant for our study based on the following: these 3 neighbouring states on the East coast hold the largest coal reserves in the country,³ prompting the largest amount of cases put in front of the NGT by interest groups on grounds of violation of environmental policy,

-

³ Odisha, Chhattisgarh and West Bengal are 2nd, 3rd and 4th respectively in the list of Indian states with the largest Coal Reserves (India Ministry of Coal 2019).

consequently counteracting low activity levels. Further, Chhattisgarh and Odisha have the largest forest cover in the country, with West Bengal also heralding some of the largest area of wetland (FSI, 2019), which suggest an increased interplay between conflicting environmental interest groups and fossil fuel industry hopefully prompting larger activity of environmental NGOs against issues identified in the previous section.

In our methodological approach, we undertook a systematic review of an NGO registry datasets, mirroring approaches discussed earlier, which utilised a manual approach to existing third-party datasets to refine, consolidate and map a formal statistical framework. We focus on NGOs, as throughout the cited above literature, NGOs were regularly mentioned and described as highly prevalent actors involved in environmental activities, and yet not very well accounted for (in contrast to the business groups' presence), allowing us for more elaborate and insightful testing of the framework and methodological approach.

Source of data

GiveIndia was identified as a best data source. It is an online donation platform, where NGOs are able to register and receive donations or raise funds, from individuals to corporate partnerships. Whilst the platform solely focuses on NGOs (limiting the scope of interest groups considered), the organisation appears to record and maintain the most reliable data undertaking financial, physical and periodic due diligence processes 'covering legal, financial, and implementation aspects' (GiveIndia, 2021). In addition, the GiveIndia collaborates and partners with multinational companies such as KPMG and Coca Cola, as well as demonstrates information transparency, publishing annual reports and audits for public access. The culmination of these aspects provides confidence in the organisation as a well-established and trustworthy source to utilise.

The second comparative data set identified during review was NGO Darpan. NGO Darpan is a platform that holds an online NGO directory, with over 122,000+ NGOs enrolled on their system.⁴ It originally began as an initiative of the Indian Prime Ministers' Office and is designed, hosted and maintained by the National Informatics Centre (with resides within the Ministry of Electronic & Information Technology in the Indian Government). The platform states that the intention is to act as a medium and interface between NGO's and Government departments/bodies.

⁴ NGO Darpan. Available at: https://ngodarpan.gov.in/index.php/home/about (Accessed 17 December 2021).

From observation NGO Darpan appears to be a suitable dataset to initiate research. The platform lists a significantly greater number of NGOs across each 3 states (1724 NGOs Chhattisgarh, 3610 in Odisha, and 9265 in West Bengal), it is free with no barriers to access; and, the initial motives of the platform would suggest it is in the government's interest to hold accurate NGO information to benefit both parties. However, a significant concern is that the platform does not appear to require or actively undertake verification and eligibility checks for each individual NGO registered. The registration is based on self-declared information and there is no accountability process. Whilst, the registration process does include the requirement of a registration certificate from the NGO, the platforms registration process states it is left to NGO to update their profile, and does not state anywhere than an annual or regular check is undertaken, or that the NGO is advised to do so, highlighting a risk that elements of the datasets may be outdated and inaccurate; which raises concerns as to the credibility of information regarding any NGOs listed.

Consequently, GiveIndia was chosen as the primary dataset. During the research, NGOs from GiveIndia were cross-referenced with NGO Darpan's database to identify if the NGO was in fact listed in both. Whilst any observations may not necessarily be considered significant for broader analysis, the findings offer indications in relation to the accuracy of and confidence in both registries. It opens an additional venue of exploration, where we can ask about motives of NGOs for registration in at one of the pages, but not the other.

Over the course of research, we observed that there are a number of third-party platforms in which NGOs are either registered or listed upon (for example: Saathire.com, NGOlist.net, NGOfoundation.in, or Valaitamil.com). Whilst useful to review for information, many of these held limited information and drew information from NGO Darpan directly, even using NGO Darpan ID number for the group. Thus, we decided to limit the research to just those two datasets.

Methodological Process

After scraping the full list of actors identified in the above-mentioned databases, to distinctively identify an NGO as active within the field of environmental policy, we have taken a number of steps. In each dataset, we identified NGOs that were listed under the 'Environment and forestry' category (927 NGOs). As control categories, we also added: 'Agriculture' and 'Animal husbandry'. 'Environment and forest' category was selected as it is directly relevant to the focus of this research, mapping the population density of interest groups active on

environmental issues. 'Agriculture' & 'Animal husbandry' were consistently identified as the two largest cause categories across all 3 states and were subsequently selected given their significant size⁵ (within the datasets) and potentially a good category for testing if patterns reoccur in other categories. While the review of the 'Environment & forestry' category took place across 3 states, for control categories, we skipped 'Agriculture' in West Bengal (776 NGOs), and 'Animal husbandry' in both Odisha (823 NGOs) and West Bengal (1212 NGOs; see Table 1).

The GiveIndia dataset contained the following information: NGO's name, cause (i.e. the NGO's subject/issue of focus) and address. In a small number of instances, a website hyperlink was already available linking to the NGO's website, where we could further retest group's commitment to environmental topics. For each individual NGO, the NGO website was reviewed where possible, investigating further groups' presence on social media, and review of any other potential sources including third party sources and new outlets (an approach deployed in a similar way, for example, in Rozbicka et al. 2021 when researching Central and Eastern European interest groups, or Comparative Interest Groups Survey, Beyers et al. 2020, when focusing on West European democracies). In both instances, details including the NGO's name (account for spelling corrections), specialisation, address were cross referenced across sources to ensure and verify NGO information.

Websites and documents were reviewed to discern aims, mission statements and/or activities that demonstrated involvement with environmental activities, conservation, or regulation. This enabled duplicate NGOs to be removed, as well as, similarly named, albeit, distinctly different NGOs to be identified and highlighted. Following this, each NGO was coded as relevant/involved with environmental activities. We look at NGOs to identify those that actively declare their involvement with environmental activity. Our argument being that not every NGO is necessarily an interest group, or active on environmental activity/advocacy/policy. We subsequently coded an NGO as an environmental interest group or not ('Yes'/'No'), highlighting NGOs that are active interest groups (Yes), and those which are not (No). NGOs were coded as 'Maybe' if there were indications that the NGO may potentially crossover or be involved with environment activities (i.e. latent interest groups), but there was limited information available online, and this would therefore require further

⁵ In each state, there were 30+ NGO cause categories. 'Agriculture' and 'Animal husbandry' were the largest NGO category types by far across the 3 states. In Chhattisgarh they account for 32.43% of the total dataset, Odisha: 41.43%, and West Bengal 29.33%.

investigation to clarify. Where NGO could not be definitively coded as relevant, or due to limited/no information available during the online reviews, NGO was coded as 'Unknown' to reflect this information gap - highlighting that we were unable to discern whether they are an active interest group.

[Table 1 about here]

A population of NGOs in the environmental policy (?)

A significant finding from the empirical data is that the vast proportion of NGOs that were reviewed, were identified and coded as 'Unknown' (Table 2). Across 3 states, on average 81% of the reviewed NGOs were classified as 'Unknown'. The percentage across states ranged between 77.78% in Odisha to 85.71% in Chhattisgarh. This demonstrates a prevalent characteristic of the population: a limited or none-existent presence online, observed consistently across all 3 states. In the majority of cases, it could not be established whether the NGOs were (or not) active on environmental issues due to an absence of, and/or insufficient information concerning their aims and activities.

Interestingly, based on data from Chhattisgarh, the 'Environment & Forest' category has a high proportion of NGOs defined as 'Unknown' (85.71%), whilst in the categories of 'Agriculture' and 'Animal Husbandry', the number of 'Unknown' groups is comparatively much less, closer to 50% (58.14% and 59.93% respectively). Yet, in the state of Odisha, the percentage (of NGOs defined as unknown) for 'Agriculture' is almost equal to 'Environment & Forest' (78.32% and 77.78% respectively). It is difficult to determine why, in Odisha, the percentages are more balanced. Possibly, funding/wealth could be a factor. However, a brief review GDP per capita (in a state ranking) places all 3 states similar grouping, and thus does not explain the disparity. Possibly, the conflictual relationship between NGOs and governments in the state is reflected online – i.e. the more conflictual interactions are in a state/area of focus, perhaps the more NGOs are not online thus to avoid government scrutiny, but also decreasing the reliability of population's data collected online.

[Table 2 about here]

The significance of this data raises multiple questions with regards to the possible population of interest groups within environmental policy area, and, the format under which interest groups (in this case NGOs) in India operate, whether using an online presence or not. As mentioned, GiveIndia outlines in their procedures that every non-profit undergoes robust due

diligence processes covering legal, compliance, financial, implementation and monitoring checks and only on fulfilling all the requirements are they are listed on the site. Assuming that this holds true, the minimal presence and information available online for many individual NGOs, indicates that this may be a potential behavioural trait, rather than that these NGOs do not exist or that data is inaccurate. This conclusion resembles themes previously noted across studies in India, such as Naveen Kumar and Rathakrishnan (2017), where farmers interest groups were noted to have been active informally.

Whilst the observation of disparate information in India is not new, there is an interesting aspect particularly in the context of NGOs. NGOs in India can, and do operate within Sub-granting process. This involves larger NGOs (which are registered under the Foreign Contribution Regulation Act, FCRA) receiving donations from outside India and redistributing funds to smaller domestic NGOs. GiveIndia as a platform mirrors a similar process that enables fundraising for individual NGOs and programmes. Further to this, Sundar (2010) notes, in the US alone there are over 1000 Indian Community associations and a number of these serve as vehicles for giving to India. Thus, upon consideration of Sub-Granting and GiveIndia as a mirroring platform, a possible explanation for the minimal presence of NGOs online may be that it is not necessary. As the NGOs reviewed in this research are registered on GiveIndia, they are therefore receptacle to funding via this platform and distributive programmes either way. Albeit, the Indian government came under criticism for amendments made to the FCRA in 2021, to which NGOs operating in India cannot distribute foreign contribution to other groups, with all funding (from abroad) required to be placed in specific accounts in the capital of Dehli (Kotecha, 2021). Whilst this is a recent shift in policy, it is difficult to assess how this may impact NGOs' behaviour with regards to developing an online presence. As Sundar (2010) goes on to state, the foreign aid to Indian NGOs has a significant place, but contrary to this, they may play a less dominant role in NGO lives in the future due to a number of indigenous developments.

Whilst these amendments may influence a discourse where NGOs increase or develop their online presence over time to compensate the barriers to funding, the results from this research indicate greater prevalence to offline (in-person) activity for a significant proportion of the NGOs, thus reducing reliability of using similar framework of analysis as deployed in twin Western democracies interest groups studies.

Although, this cannot be assumed as a definitive trait across interest groups in India (or even the states reviewed in this article), the findings do highlight an interesting aspect to interest group activities and culture. An intriguing consideration is the recent and continued exponential increase in online access and usage for individuals in India (World Bank, 2021, Economic Times, 2021), which may further influence this. It is essential to note, that alternative dimensions such as funding, NGO size, and community engagement would also be factors that influence interest groups' presence and demand to operate online. Whilst this research article does not investigate these dimensions, the proposed framework and initial identification offers a foundation to start further investigation.

Another finding, following on from previous comments of disparity in information, is the fact that the vast majority of NGOs reviewed from the GiveIndia datasets, were not listed on NGO Darpan. On average, 73.06% of NGO's reviewed were not listed on NGO Darpan. There is a vast disparity in the population and activities NGOs listed on the government database (NGO Darpan) compared to the NGOs currently operating in India. The incentive for NGOs to register on NGO Darpan initially appears clear. As the platform states, its intention is to act as a medium between groups, government departments, and opportunity to apply for grants. However, the state of affairs in India is far from the proclaimed intentions. Alongside criticisms of the restrictive nature of the recent FCRA amendments (Kotecha, 2021., Das, 2021), the contemporary dynamic between NGOs and the Indian government is conflicted and in many cases hostile (Sinha 2021; Kazmin 2020; Goetz & Jenkins 2001) with criticisms particularly weighted towards the role of external funds/agents in NGO activities. Upon consideration of this dynamic, a possible explanation for the disparity between the two databases could be caused by unwillingness by NGOs to register at the government limited and controlled pages, favouring instead the funding opportunities provided by GiveIndia, particularly due to its highprofile endorsements and corporate partnerships.

The conflicted dynamic between government departments and NGOs should not be assumed as a constant state of affairs. Research from Gupta and Koontz (2019) explored the activity, interplay and possible synergy between government and NGO roles for community forestry in India. They found engagement from both agents varied with the factors of proximity and easy accessibility facilitating greater interaction between NGOs, governments and the impact to fostering community action and engagement. This mirrors similar themes noted by Salifu et al. (2010) in India, and intriguingly by Knill & Liefferink (2011) within the EU and environmental policies indicating there may be similarities in the role and agency of NGOs. In reflection,

whilst NGO Darpan findings are significant, the national reporting of a hostile environment should not be assumed for interest groups identified and requires further investigation to understand the population patterns between states. As Gupta and Koontz (2018) argue their study is reflective of local realities, but it is not a representative sample for generalising to other contexts (Lund, Rutt, & Ribot, 2018). This research further reiterates this statement, as evidence would suggest that patterns of interest group behaviour may differ to expectations (or from the possible explanations) noted at national, state and local level.

Table 2 further reports the NGOs present within the categories of 'Agriculture' and 'Animal husbandry' in Chhattisgarh and Odisha. 12-16% of the NGOs under the category of 'Agriculture' were identified as environmental interest groups and 11% under 'Animal husbandry'. The number of NGOs identified as not-environmental interest groups appears to be comparatively far less, ranging from 0.91% - 5.98%. Whilst this initially appears as half the rate of NGOs identified as environmentally active interest groups, the nominal values stated in Table 2 demonstrate that there is not a significant difference in the nominal number across all states and categories. The exception to this is the category 'Agriculture' in Odisha, where 67 NGOs were identified as environmental interest groups, whereas only 5 NGOs were identified as not.

From a pluralistic framework, these findings are particularly interesting, when also considering the overall composition of the GiveIndia datasets, culminating of NGOs in over 40+ different categories of focus, with these findings demonstrating crossover between interest groups topics of focus, in this case, 'Agriculture' and 'Environmental' interests. The interest group population in these states from initial observations appear to be diverse in subject. Although 'Agriculture' and 'Animal husbandry' in particular compose a significant amount of the NGO datasets sampled, indications of interest group crossover from this research demonstrate plurality within interest group populations as more dynamic than initially observed on GiveIndia.

Conclusions

The main objective of this research was to establish a more nuanced framework that could be used in studying interest groups in India allowing for comparative study with Western democracies and using similar metrics. As a theoretical background, we have used Gray and Lowery (1996a,b) population ecology approach and focused on groups' density and characteristics of the environment in which they operate and can have impact of their numbers.

The purpose of such a framework is to be able to accurately map and obtain insight to interest group populations, and in later stages, groups' patterns of activity and strategies.

This research undertook a similar manual review process to that of Fraussen and Halpin (2016) and Rozbicka and Kamiński (2022) to produce accurate data and a confident foundation to further develop and continue analysis of interest group populations within India. The review of 927 NGOs across the categories of 'Environment & forest' and controlled by comparisons to 'Agriculture' and 'Animal husbandry', has offered insightful analysis on the potential and actual numbers of environmentally active interest groups, with insight to interest group activity more generally.

A discordant, sometimes conflictual culture between NGOs and the Indian government is well documented (Sinha, 2021., Kazmin, 2020), however a brief literature review demonstrates, certainly at a local level, the actuality of this can be much more nuanced, with instances of both NGO and government agencies working in a synergy to engage collective action, community engagement and tackle issues (Gupta and Koontz, 2018). Upon reflection, the disparity of information identified within this research highlights an intriguing, new area of focus to understand a dimension of the interplay and strategies of interest groups and their relationship with government bodies and how that in turn impacts groups' visibility online.

With a significant proportion of NGOs registered with GiveIndia, and not found on the Indian governments platform (NGO Darpan), this raises interesting questions as to why NGOs may be registered with, and possibly prefer GiveIndia as a funding platform to the government. One would question whether this is indicative of NGOs online presence solely, or a further feature of the discordant narrative between interest groups and the government. Both GiveIndia and NGO Darpan operate and function across India and variations between the national, state, and local activities of government and interest groups may yet exist as has been demonstrated by observations of synergy between the two (Gupta and Koontz 2018).

Further exploration of the present and future databases would benefit from focussing upon significant findings highlighted by this research, such as the number of verified environmentally active interest groups and moving further to identify their activities, operations with communities and policy, and exploring questions such as online presence and the discrepancies with information. The database should also be built further through continued review and analysis of the GiveIndia dataset and expanding adding other datasets that go beyond NGOs only.

This research, though limited in size, provides an insightful foundation and avenues of research in an elusive, more quantitative aspect of literature in which to research, develop and understand the presence, role and interplay of interest groups in India. In a period where the contemporary culture between NGOs and government is seemingly discordant from national perspectives, understanding interest group populations, activity, patterns and interplay from a state and local level is ever more important to analyse their role amongst communities and influencing policy. Similarly, it would be very interesting and insightful to critically compare and contrast interest group populations and strategies in India to other countries, as whilst they herald similar 'informal' legal frameworks with regards to lobbying (a prevalent form of interest group activity across many Western states including in the EU), the cultures of both regions have vast differences.

On	behalf	of a	all	authors,	the	correspond	ding	author	states	that	there	is no	conflict	of	interest	

BIBLIOGRAPHY

Abhishek, A. (2021) 'Academic freedom is under attack in Modi's India'. *Aljazeera*. 18 December. Available at: https://www.aljazeera.com/opinions/2020/12/18/academic-freedom-is-under-attack-in-modis-india (Accessed 11 September 2021).

Altenburg, T. (2011) 'Interest groups, power relations, and the configuration of value chains: The case of biodiesel in India'. *Food Policy*, 36(6), pp.742-748.

BBC News. (2021) 'Disha Ravi: India activist arrest decried as 'attack on democracy'. 15 February. Available at: https://www.bbc.co.uk/news/world-asia-india-56066478 (Accessed 1 September 2021).

Beyers, J., Eising, R. and Maloney, W. (2008) 'Researching Interest Group Politics in Europe and Elsewhere: Much We Study, Little We Know?' *West European Politics*, 31(6), pp. 1103-1128.

Beyers, J., Fink-Hafner, D., Maloney, W., Novak, M. and Heylen, F. (2020) 'The Comparative interest Groups-survey project: design, practical lessons, and datasets', Interest Groups & Advocacy, 9, pp. 272-289.

Bhardwaj, M. (2021) 'Explainer: How Indian farmers' protest turned into a country-wide movement'. *Reuters*. 9 September. Available at: https://www.reuters.com/world/india/how-indian-farmers-protest-turned-into-country-wide-movement-2021-09-09/ (Accessed 11 September 2021).

Birkenholtz, T. (2009) 'Groundwater governmentality: hegemony and technologies of resistance in Rajasthan's (India) groundwater governance'. *The Geographical Journal*, 175 (3), 208–220.

CEEUGID Administrative Staff College of India (ASCI). (2009) 'Analysis of existing environmental instruments in India'. Hyderabad. UNDP supported study.

Centre for Policy Research (CPR). (2016) 'How effective are environmental regulations to address impacts of industrial and infrastructure projects in India'. *India: CPR-Namati Environmental Justice Program.* Available at:

https://in.boell.org/sites/default/files/how_effective_are_environmental_regulations_to_address_impacts_of_industrial_and_infrastructure_projects_in_india.pdf (Accessed: 12 November 2021)

Chandra, K. (2004). 'Why Ethnic Patries Succeed, Cambridge: Cambridge University Press.'

Chatterjee, T. (2018) 'Independent Environmental Regulation in India: Less an Authority and more a Process from Below', *Indian Journal of Public Administration*, 64(4), pp. 614–626.

Chouhan, H., Parthasarathy, D. and Pattanaik, S. (2016) 'Urban development, environmental vulnerability and CRZ violations in India: impacts on fishing communities and sustainability implications in Mumbai coast', *Environment, Development and Sustainability*, 19(3), pp.971-985.

Christiansen P.M. (2012) 'The Usual Suspects: Interest Group Dynamics and Representation in Denmark'. *In: Halpin D., Jordan G. (eds) The Scale of Interest Organization in Democratic Politics. Interest Groups, Advocacy and Democracy Series*. London: Palgrave Macmillan, pp. 161-179.

Das, A. (2021) 'India's Strict Rules on Foreign Aid Snarl Covid Donations'. *The New York Times*. 12 May. Available at: https://www.nytimes.com/2021/05/12/business/india-covid-donations.html (Accessed 26 September 2021).

Dobbins, M. and Riedel, R. (eds.) (2020) Exploring Organized Interests in Post-Communist Policy-Making - The "Missing Link". London: Routledge.

Economic Times. (2021) 'India to have 900 million active internet users by 2025'. 3 June. Available at: https://economictimes.indiatimes.com/tech/technology/india-to-have-900-million-active-internet-users-by-2025-says-report/articleshow/83200683.cms?from=mdr (Accessed 25 September 2021).

Fink-Hafner, D., Hafner-Fink, M. and Novak, M. (2014) 'Europeanisation as a Factor of National Interest Group Political-Cultural Change'. *East European Politics and Societies: and Cultures*, 29(1), pp.287-305.

Fraussen, B. & Halpin, D. (2016) 'Assessing the Composition and Diversity of the Australian Interest Group System'. *Australian Journal of Public Administration*, 75, 4.

FSI. (2019) 'India state of the forest report 2019'. India: Forest Survey of India, Ministry of Environment and Forests.

Ghosh, D., (2016) 'We don't want to eat coal": Development and its Discontents in a Chhattisgarh district in India,' *Energy Policy*, 99, pp.252-260.

GiveIndia. (2021c). 'Terms and Conditions - GiveIndia Fundraisers'. Available at: https://fundraisers.giveindia.org/terms-conditions (Accessed 27 September 2021).

Goetz, A.M. & Jenkins, R. (2001) Hybrid Forms Of Accountability: Citizen engagement in institutions of public-sector oversight in India, Public Management Review, 3:3, 363-383, DOI: 10.1080/14616670110051957

Gray, V. amd Lowery, D. (1996a) 'The Population Ecology of Interest Representation: Lobbying Communities in the American States'. University of Michigan Press. 1st Edition.

Gray, V. amd Lowery, D. (1996b)' A Niche Theory of Interest Representation', Journal of Politics, 58 (1): 91-111.

Gray, V. and Lowery, D. (2000) 'The Population Ecology of Interest Representation: Lobbying Communities in the American States'. University of Michigan Press. 2nd Edition.

Gupta, D. and Koontz, T. (2019) 'Working together? Synergies in government and NGO roles for community forestry in the Indian Himalayas'. *World Development*, 114, pp.326-340.

Human Rights Watch. (2020) 'India: Arrests of Activists Politically Motivated'. 16 September. Available at: https://www.hrw.org/news/2020/09/16/india-arrests-activists-politically-motivated (Accessed 11 September 2021).

IAMAI. (2020) 'India's active Internet population likely to touch 900 million by 2025'. Available at: https://cms.iamai.in/Content/MediaFiles/7d9fac50-7cac-43df-93c9-0cf34fb52403.pdf (Accessed 25 September 2021).

IMF. (2020) 'IMF Datamapper – GDP'. Available at: https://www.imf.org/external/datamapper/NGDPD@WEO/OEMDC/ADVEC/WEOWORLD (Accessed 6 April 2020).

India Ministry of Coal. (2019) 'Coal reserves 2019'. Available at: https://coal.gov.in/en/major-statistics/coal-reserves (Accessed 17 December 2021).

Jenkins, R.S. (1995) Theorising the politics of economic adjustment: Lessons from the Indian case, Journal of Commonwealth & Comparative Politics, 33:1, 1-24, DOI: 10.1080/14662049508447693

Kazmin, A. (2020) 'Indian charities battle for survival after government crackdown'. *The Financial Times*. 30 September. Available at: https://www.ft.com/content/41e65a46-1ca3-4cfa-b1db-c7a1b7273996 (Accessed 26 September 2021).

Knill, C. and Liefferink, D. (2011) 'Environmental Politics In The European Union'. Manchester: Manchester Univ. Press.

Kochanek, S. A. (1987). Briefcase Politics in India: The Congress Party and the Business Elite. Asian Survey, 27(12), 1278–1301. https://doi.org/10.2307/2644635

Kochanek SA. 1995. The transformation of interest politics in India. Pacific Affairs 68(4): 529–550.

Kochanek, S.A. (1996) Liberalisation and business lobbying in India, Journal of Commonwealth & Comparative Politics, 34:3, 155-173, DOI: 10.1080/14662049608447729

Kohli, K. and Menon, M. (2016) 'The Tactics of Persuasion: Environmental negotiations over a corporate coal project in coastal India'. *Energy Policy*, 99, pp.270-276.

Kotecha, S. (2021) 'India Covid: How law stops NGOs distributing essential aid'. *BBC News*. 13 May. Available at: https://www.bbc.co.uk/news/world-asia-india-57095591 (Accessed 25 September 2021).

Kothari, R. (1964). 'The Congress system in India', Asian Survey, 4(12) Dec, 1161-1173.

Lowery, D. and Gray, V. (2004). 'A Neopluralist Perspective on Research on Organized Interests', Political Research Quarterly, 57, 1, pp. 163-75.

Lund, J., Rutt, R. and Ribot, J. (2018) 'Trends in research on forestry decentralization policies'. *Current Opinion in Environmental Sustainability*, 32, pp.17-22.

Mahmood, Z. (2016) 'Trade Unions, Politics and Reform in India,' *Indian Journal of Industrial Relations*, 51 (4), , pp. 531–549.

Miklian, J. (2011) 'Revolutionary conflict in federations: the Indian case'. *Confl. Secur. Dev.* 11 (1), 25–53. http://dx.doi.org/10.1080/14678802.2011.552246.

MoEFCC. (2006) 'Ministry of Environment, Forests and Climate Change: EIA Notification, 2006', S.O. 1533, 14 September. Available at: http://parivesh.nic.in/writereaddata/ENV/EnvironmentalClearance-General/18.pdf

Mohan, J. (2012) 'Above and below the radar: Mapping the distribution of civil society associations in England', in: Halpin D., Jordan G. (eds) The Scale of Interest Organization in Democratic Politics. Interest Groups, Advocacy and Democracy Series. London: Palgrave Macmillan, pp. 202-222.

Naidu, S.C. (2009) 'Heterogeneity and collective management: evidence from common forests in Himachal Pradesh, India', *World Development*, 37 (3), 676–686

Naurin, D. & Borang, F. (2012) 'Who are the lobbyists?: A population study of interest groups in Sweden'. *Statsvetenskaplig tidskrift*, 114 (1), pp. 95-102.

Naveen Kumar, M. R. and Rathakrishnan, T. (2017) 'A Study on Relationship of Characteristics and Performance of Guava Farmer Interest Groups in Tamil Nadu', *Madras Agricultural Journal*, 104(7–9), p. 261.

Oskarsson, P. and Bedi, H. (2018) 'Extracting environmental justice: Countering technical renditions of pollution in India's coal industry', *Extractive Industries and Society*, 5(3), pp.340-347.

Oskarsson, P., Lahiri-Dutt, K. and Wennström, P. (2019) 'From Incremental Dispossession to a Cumulative Land Grab: Understanding Territorial Transformation in India's North Karanpura Coalfield,' *Development and Change*, 50(6), pp.1485-1508.

Parliament of India. (1988) 'The Prevention of Corruption Act, 1988. Act No. 49 of 1988. Section.7'. Available at: http://legislative.gov.in/sites/default/files/A1988-49.pdf (Accessed 22 June 2020).

Pulla, V., Jaysawal, N. and Saha, S. (2019) 'Challenges and Dilemmas of Civil Society Movements in India', *Asian Social Work & Policy Review*, 13(2).

Raj, S. (2017) 'People's Movement in Odisha: An Assessment', *Indian Journal of Public Administration*, 63(2), pp.265-283.

Rozbicka, P., Kaminski, P., Novak, M., Jankauskaitė, V. (2020) 'Achieving democracy through interest representation. Interest groups in Central and Eastern Europe in a comparative perspective'. Palgrave Macmillan.

Rozbicka, P. and Kamiński, P. (2022) 'Have They Already Emerged? Mapping the Population of National Interest Organisations in Post-Communist Poland', *Europe-Asia Studies*, 74(5), 789-808. DOI: 10.1080/09668136.2021.1900075

Rudolph, L. and Rudolph, S. (2012) 'The Political Role of India's Caste Associations'. *Pacific Affairs*, 85(2), pp.335-353.

Saha, A. (2017), "Join hands or walk alone? Evidence on lobbying for trade policy in India", ARTNeT Working Paper Series, No. 167, June 2017, Bangkok, ESCAP.

Saha, A. (2019). 'Trade policy & lobbying effectiveness: Theory and evidence for India', European Journal of Political Economy, 56, 165-192. https://doi.org/10.1016/j.ejpoleco.2018.08.004.

Salifu, A., Francesconi, G. N. and Kolavalli, S. (2010) 'A Review of Collective Action in Rural Ghana'. *IFPRI Discussion paper* 00998.

Šarkutė, L., Krupavičius, A., Jankauskaitė, V. & Simonaitytė, V. (2017) 'Sampling Procedure of Lithuanian Interest Groups Survey'. *Kaunas, Institute of Public Policy and Administration*.

Sarma, E.A.S. (2006) 'The Saga of Salwa Judum in Chhattisgarh'. *The Hindu*. 26 June. Available at: https://www.thehindu.com/todays-paper/tp-opinion/the-saga-of-salwa-judum-in-chhattisgarh/article3124445.ece Accessed: 18 November 2021

Shrotria, S. (2015) 'Environmental justice', Environmental Law Review, 17(3), pp.169-188.

Sinha, S. (2021) 'Strong leaders', authoritarian populism and Indian developmentalism: The Modi moment in historical context. *Geoforum*, 124, pp.320-333.

Singh, R., Sharma, N. and Jha, U. (2014) 'Think Tanks, Research Influence and Public Policy in India'. *Vision: The Journal of Business Perspective*, 18(4), pp.289-297.

Soutik, B. (2021) 'The Indian government's war with Twitter'. *BBC News*. 12 February. Available at: https://www.bbc.co.uk/news/world-asia-india-56007451 (Accessed 11 September 2021).

Sundar, P. (2010) 'Foreign Aid for Indian NGOs: Problem or Solution?'. (1st ed.). Routledge India. Ch 11. Available at: https://doi.org/10.4324/9780367817923

Teitelbaum, E. (2006) Was the Indian Labor movement co-opted? Critical Asian Studies, 38:4, 389-417, DOI: 10.1080/14672710601072988

Tillin, L. (2013) Remapping India: New States and Their Political Origins. Oxford University Press, New York.

Titus, D. (2007) 'Corporate Lobbying and Corruption-Manipulating Capital'. *India Law Journal*, 4(3).

Truman, D. (1958) 'The Governmental Process: Public Interests and Public Opinion'. New York: Knopf.

UN. (2023) 'Population - Global Issues'. Available at: https://www.un.org/en/global-issues/population (Accessed 12 February 2023).

Verma, R. K. (2017) 'Environmental politics in India: A study of the policy, parties and the people' (*Research report submitted to UGC, monograph*). Hajipur: R. N. College.

Verma, R. (2019) 'Environmental Jurisprudence in India (Is People's Attitude Under Its Purview?)'. *Indian Journal of Public Administration*, 65(4), pp.916-929.

Yadav, V. (2006). An Information Model of Interest Group Dynamics in Developing Countries: A Comparison of Brazil, China, and India. ProQuest, 2006.

Yadav, V. (2008) 'Business lobbies and policymaking in developing countries: the contrasting cases of India and China', Journal of Public Affairs, 8: 67-82. DOI: 10.1002/pa.285

Yoho, J. (1998) 'The evolution of a better definition of "interest group" and its synonyms'. *The Social Science Journal*, 35(2), pp.231-243.

World Bank. (2021) 'Individuals using the Internet (% of population) - India | Data'. Available at: https://data.worldbank.org/indicator/IT.NET.USER.ZS?locations=IN (Accessed 25 September 2021).