Guide to Addressing and Removing Records from the Blue Map Database

IPE's Blue Map Database holds more than 1.6 million environmental violation records that have been issued and made publicly available by the Chinese government since 2006, as well as real-time emissions data from 18,000 priority manufacturing facilities around the country. Dozens of high-profile Chinese and multinational corporations actively use this database and IPE's new Blue EcoChain search tool to oversee regulatory compliance and improve the environmental performance of factories in their supply chains in China.

When compliance problems are discovered in the database, factories are expected to take action on two fronts: 1) issue a public explanation to explain why the violation occurred and what they plan to do about it; 2) remediate the problem. Only after remediation is complete and it has been documented and validated using the processes described below can non-compliance records be removed from the Blue Map Database. Between 2006 and 2019, 2,300 suppliers published information regarding their violation records and over 3,900 supplier removed records using this system.

Information Disclosure

The first step a facility is expected to take to address its noncompliance ("supervision") record is to provide a public explanation of the reasons why it received a violation citation, as well as an update on the current status of any follow-up corrective actions to help concerned stakeholders understand the cause of the problem and the facility's present environmental management. Enterprises are required to provide documentation and data to verify their public statements wherever possible. Enterprises can register a corporate account on the Blue Map website, and upload themselves all the files they would like to disclose publicly. IPE will then review the relevance of the files and upload under "Enterprise Feedback" on the facility's page in the database.

Please note that publishing a public explanation will not suffice to remove a record, even if official documentation demonstrates that corrective action is complete. Record removal requires IPE and/or third-party review and approval. However, the explanations provided in this step are important to indicate that a facility has responded to its compliance problem and to ameliorate stakeholder concern.

While most enterprises use IPE's database to publish their explanations, they are also encouraged to publish the information on their own websites. In both cases, an automatic notification and website link will be published on IPE's website under IPE Notices to boost transparency and accountability.

Record Removal

The process required to remove a violation record from the Blue Map Database varies depending on the nature, severity and year of the penalty. An off-site document review suffices for less serious offenses, and it can be undertaken expeditiously, so long as:

- The facility provides IPE with sufficient documentation and environmental data to confirm the reason the supervision record was issued and that corrective actions have been implemented
- The facility demonstrates that its environmental practices now operate in compliance with the law

At the other extreme, more serious violation records issued within the past two years can be removed only after facilities pass an on-site audit that verifies the enterprise's rectified pollution management and control status. This audit must be undertaken by one of the IPE-approved third-party auditing agencies and monitored by IPE or representative from the Green Choice Alliance of Chinese NGOs to fully ensure that the enterprise has in fact corrected its illegal practices and achieved compliance with the law.

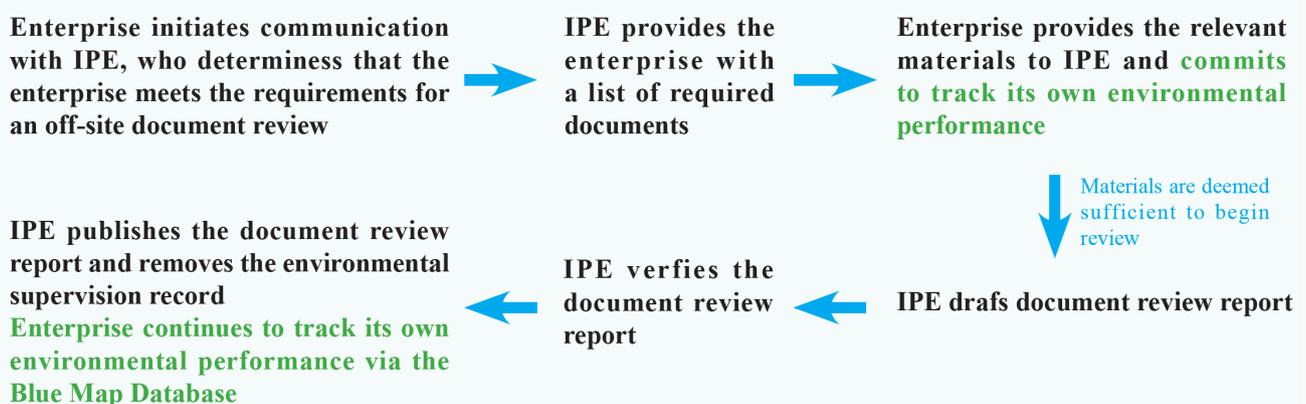## Off-site Document Review: Eligibility & Process

There are twenty types of violations that are eligible for record removal via off-site document review, contingent upon satisfying IPE's assessment and the facility's commitment to tracking and proactively reporting its own environmental performance with the public in the future by actively using the Blue EcoChain. The most common eligible violations include the following:

- Procedural violations for environmental impact assessments (EIAs)
- Operating without a permit while pending government approval
- Exceeding pollutant discharge standards due to malfunctioning online monitoring equipment
- Inadequate hazardous waste storage and transport paperwork
- Other violations that did not result in pollution problems

In addition, violations that are more than two years old can also be resolved with an off-site document review so long as the facility provides proper government documents verifying past corrective actions. A comprehensive list of violations eligible for record removal via document review, along with description of the documentation required for each type of violation, are available in Chinese.

The process used to remove records with an off-site document review is as follows:

Enterprise initiates communication with IPE, who determiness that the enterprise meets the requirements for an off-site document review → IPE provides the enterprise with a list of required documents → Enterprise provides the relevant materials to IPE and commits to track its own environmental performance

Materials are deemed sufficient to begin review ↓

IPE drafs document review report ← IPE verfies the document review report ← IPE publishes the document review report and removes the environmental supervision record. Enterprise continues to track its own environmental performance via the Blue Map Database

On-site Compliance Audit: Eligibility & Process

More serious pollution violation records and records issued within the past two years require an on-site third-party audit in order to be removed from the Blue Map Database. These cases include but are not limited to the following violations:

- Emissions in excess of key pollutant volume control standards
- Emissions containing heavy metals, persistent organic pollutants, and other harmful contaminants in concentrations more than three times pollutant discharge standards
- Wastewater discharged through hidden pipes that circumvent treatment
- Unlined seepage ponds that could potentially leak into groundwater
- Failure to install or idling/dismantling pollution control equipment
- Tampering and/or forging monitoring data in order to evade supervision
- Refusal to carry out orders to suspend production or other administrative punishments

The above and select other violations are all considered severe violations. A more detailed description of the violations that require on-site audits for record removal, as well as the relevant responsibilities of each participating party, documentation requirements and reporting templates, are available in Chinese. The process used for on-site audit procedures is as follows:

Enterprise initiates communication with IPE, who determiness that the enterprise meets the requirements for an on-site audit → **Enterprise selects an IPE-approved auditing agency** → **Auditing agency determines the audit plan** → **Enterprise provides auditing companies the documents and commits to track its own environmental performance**

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All three parties participate in pre-audit meeting

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The on-site audit is conducted and the enterprise discloses progress of corrective action ←

On-site issues identified **Auditing agency submits preliminary report** ←

Enterprise completes corrective actions to address on-site issues ←

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Auditing agency confirms the completion of corrective actions and provides the final audit report →

No on-site issues identified ↓ **IPE provides feedback** → **IPE confirms the on-site audit report** → **Audit report is circulated to GCA NGOs for 7-day review period**

↓ *No objections*

IPE publishes the on-site audit report and removes the environmental supervision record

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Enterprise continues to track its own environmental performance via the Blue Map Database