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# Guide to Addressing and Removing Environmental Supervision Records

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Blue Map Database

**IPE**  **公众环境研究中心**  
Institute of Public & Environmental Affairs

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Note: This new edition of the guidelines takes effect immediately. The previous guidelines on record removal are now considered null and void.

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Since 2006, the Institute of Public & Environmental Affairs (IPE) has continuously collected, collated and analyzed government and corporate environmental information. IPE's continual gathering of government-published data, including environmental quality information, emissions data and pollution source supervision records from 31 provinces and 338 prefecture-level cities, has generated a set of environmental data resources of considerable scope and application value.

IPE's Blue Map [website](#) and [mobile app](#) provide stakeholders with an open data platform to more effectively participate in environmental governance. With the expansion of environmental information disclosure in China, the number of corporate environmental supervision records added to the Blue Map Database has continued to grow, topping 1.3 million records as of March 2019.

In order to help stakeholders access environmental information, and also provide a platform for corporate information disclosure, we offer two methods for enterprises to address their supervision records: "information disclosure" and "record removal."<sup>1</sup>

## 1. Information Disclosure

"Information disclosure" refers to companies' disclosure of relevant documents on the Blue Map Database that explain the reasons why a violation record was received and the status of follow-up corrective actions. This practice helps stakeholders gain a better understanding of the reasons for violations, the measures used for subsequent corrective actions and current state of environmental management.

Enterprises that wish to publish documents can send them directly to IPE at [gsc@ipe.org.cn](mailto:gsc@ipe.org.cn) after ensuring all documents bear the official company seal. IPE will then upload them to the "Enterprise Feedback" section of the "Records" page on the IPE database. This process does not require any fees to be paid.

IPE recommends that explanatory documents include but are not limited to the following:

- a. Reason for violation: Administrative penalty decisions issued by environmental protection departments; explanatory statements clarifying the company's reason for the violation record;
- b. Adoption of corrective measures: Explanatory statements issued by the company about corrective measures taken; verification documents issued by environmental protection departments about the completion of corrective actions;

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<sup>1</sup> For more information, please write to [gsc@ipe.org.cn](mailto:gsc@ipe.org.cn).

- c. Management situation of pollution control equipment and contingency plans: Online monitoring data; environmental protection departments' monitoring reports; third-party monitoring reports.

**NOTE:**

- (1) All documents issued by the company (that is, documents not provided by third parties) must be stamped with the official seal of the company.
- (2) The documents issued by the Ministry of Ecology and Environment must be stamped with the official seal of the MEE. If the seal is missing, then a full version of the documents signed by government personnel may be provided instead.

Information disclosure alone will not suffice to remove a record; the corporate environmental supervision record will remain in the Blue Map Database. However, the disclosed documents will reflect the enterprise's current status of full rectification.

Meanwhile, all enterprise feedback information will also be published in the "[IPE Notices](#)" section of the website.

## 2. Removal of Corporate Environmental Supervision Records

Enterprises that wish to remove a record from the Blue Map Database must undertake practical corrective measures and pass a Green Choice Alliance audit.<sup>2</sup> This process demonstrates the following to the public:

- The enterprise has effectively corrected the illegal practices listed in its environmental violation record.
- The enterprise satisfies the requirements of the related laws, regulations and standards for the emissions, collection, storage, treatment, discharge and transfer of all pollutants (including industrial wastewater, domestic wastewater, industrial emissions, canteen exhaust, hazardous waste, etc.) during normal, abnormal and emergency operations and service provision.
- The enterprise has established an environmental management system and pollution prevention facilities are operating normally.

Based the year and nature of the violation, and the severity of the penalty, there are two different methods of record removal: an off-site document review or an on-site third-party audit. All decisions regarding the standards for auditing procedures are made by IPE. After the violation record has been removed from the Blue Map, the record removal report will be simultaneously published under the "IPE Notices" section of the website.

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<sup>2</sup> Green Choice Alliance, a network of 58 Chinese environmental NGOs founded in 2007 with the mission of advancing green procurement for green production.

### 2.1 Off-site Document Review

Off-site document review refers to the process whereby an enterprise publicizes relevant documents and environmental protection data to confirm the reason for its supervision record, what corrective actions it has carried out, and demonstrates its environmental management practices have achieved the current status of legal compliance.

Document reviews are carried out by IPE, who will review the documents submitted by the enterprises for their relevance and help disclose them for public supervision.

If the corporate environmental record falls into one of the following categories, the enterprise may undergo an off-site document review in order to remove its record, contingent on the enterprise’s public commitment to continue tracking its own environmental performance<sup>3</sup>:

Type	Supervision Record Details	Document List
Document or procedural issue	- Did not carry out the “three synchronizations” requirement for EIAs (the facilities for construction project pollution prevention were not designed, built, and put into operation at the same time as the main project processes), and the issue in question does not relate to wastewater, air emissions or solid waste	- Explanation of circumstances, detailing the reasons why a violation record was received - Documents to substantiate approval and acceptance for the “three synchronizations” requirements
	- Enterprise did not obtain a discharge permit while pending government approval	- Explanation of circumstances, detailing the reasons why a violation record was received - Updated emissions permit - Monitoring reports from the period during which the emissions permit expired
Review & clean-up of illegal construction projects	- Issues related to the local review and clean-up of historical environmental violation issues, such as construction without approval, construction that does not adhere to the given approval, production that starts without first receiving verification, and other transgressions	- Explanation of circumstances, detailing the reasons why a violation record was received - Documents to substantiate approval and acceptance for the “three synchronizations” requirement

<sup>3</sup> IPE reserves the final right to interpretation on all matters. For all matters not covered, please contact IPE.

<p>Enterprise environmental credit rating/ "yellow card"</p>	<ul style="list-style-type: none"> <li>- Unable to offer a reason for yellow card violation, but enterprise does not produce wastewater, air emissions or solid waste</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Initial notice listing environmental credit ratings</li> <li>- Document showing proof of rectifications</li> <li>- Proof of no violation records after the implementation of rectifications or "blue" and/or "green" card in a subsequent enterprise environmental credit rating</li> </ul>
<p>Temporary limitation of production</p>	<ul style="list-style-type: none"> <li>- Did not comply with requirements for heavy pollution weather warning(s) and adopt production limitation measures accordingly</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Verification of production reduction measures</li> <li>- Contingency plan to meet requirements for ceasing production during heavy pollution</li> </ul>
<p>Online monitoring equipment</p>	<ul style="list-style-type: none"> <li>- Emissions shown as exceeding standards or no data shown due to malfunction of online monitoring equipment</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Government approval document confirming malfunction of online monitoring</li> <li>- Online monitoring data for most recent six months</li> </ul>
	<ul style="list-style-type: none"> <li>- Online monitoring equipment was never approved or did not undergo data validity verification</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Inspection documents or proof of data validity</li> <li>- Online monitoring data for most recent six months</li> </ul>
	<ul style="list-style-type: none"> <li>- key pollutant-discharging entities refused to install automatic monitoring equipment, or did not install automatic monitoring equipment and connect it with the automatic monitoring network website by the deadline, etc.</li> <li>- Did not disclose annual self-monitoring plan</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Documents demonstrating the acceptance of online monitoring equipment</li> <li>- Data validation verification</li> <li>- Verification of publication of self-monitoring plan</li> <li>- Online monitoring data for most recent six months</li> </ul>
	<ul style="list-style-type: none"> <li>- Entity responsible for operating the online monitoring equipment received an environmental supervision record, and the record does not relate to data fraud issues</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Explanation of the reasons why online monitoring failed to undergo auditing for effectiveness or malfunctioning</li> <li>- Written government verification of follow-up rectifications</li> </ul>

<p>Hazardous Waste</p>	<ul style="list-style-type: none"> <li>- Hazardous waste storage sites did not conform to standards</li> <li>- Containers and packaging for hazardous waste, and/or facilities and entities for the collection, storage, transport, and handling of hazardous waste, were not properly labelled</li> <li>- Supplied or entrusted a business unit without a permit to engage in the collection, storage, utilization and/or handling of hazardous waste of a quantity less than three ton</li> <li>- Did not complete hazardous waste transfer list according to national regulations or did not seek approval to transfer hazardous waste, and the total volume of waste was less than three tons</li> <li>- Mixed hazardous waste with non-hazardous waste for storage, and the total quantity of hazardous waste was less than three tons</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Hazardous waste management plan</li> <li>- Hazardous waste transfer list</li> <li>- Treatment contract and business qualifications for hazardous waste treatment plant</li> </ul>
<p>Disabling of equipment</p>	<ul style="list-style-type: none"> <li>- Equipment that caused excessive emissions has been suspended or disabled, and there are no other pollutant emissions of a similar variety</li> </ul>	<ul style="list-style-type: none"> <li>- Written explanation of the reason for violation</li> <li>- Written proof that equipment has been disabled</li> <li>- Written proof that there are no other pollutant emissions of a similar variety</li> </ul>
<p>Relocation or production halt</p>	<ul style="list-style-type: none"> <li>- The company that received a violation record has been relocated or discontinued</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Documents certifying that production was halted provided by Ministry of Ecology and Environment or the Ministry of Commerce</li> <li>- EIA approval document received after relocation</li> </ul>
<p>Accident</p>	<ul style="list-style-type: none"> <li>- Accidental fire or explosion that does not significantly impact the environment</li> </ul>	<ul style="list-style-type: none"> <li>- Written explanation of the reason for the accident</li> <li>- Written government verification of follow-up rectifications</li> </ul>
	<ul style="list-style-type: none"> <li>- Did not undertake environmental incident risk assessment work</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Filing of emergency contingency plan</li> <li>- Documents substantiating the execution of emergency response drills</li> </ul>

Noise	- Noise disturbed residents	- Written explanation of the reason for violation and of corrective actions taken - Noise monitoring report
Dust	- No dust prevention measures - Open-air piling/stacking - Storage yard lacked coverage - Dust pollution	- Written explanation of the reason for violation and of corrective actions taken - Monitoring reports for fugitive emissions
Nuclear Safety	- Violation of the Regulations on the Supervision and Management of Civil Nuclear Safety Equipment	- Written explanation of the reason for violation and of corrective actions taken - Verification of corrective measures issued by the MEE Office of Nuclear and Radiation Safety Inspection
Energy efficiency violation	- Production and use of energy-intensive and outdated products, equipment and processes that have been eliminated by the state - Production processes were unable to comply with mandatory energy consumption standard limits and/or energy efficiency standards, and energy consumption data cannot be verified - Punitive electricity pricing, differential pricing, or ladder pricing - Energy statistics and energy measurement did not meet national requirements - Forged and/or tampered with energy consumption data - Other violations of energy conservation laws and regulations	- Documents explaining the reason for violation and corrective actions - Written government verification of follow-up rectifications
Imported Waste	- Suspected transfer of imported waste plastics	- Documents explaining the reason for violation and corrective actions
	- Suspected fraudulent import license (for imported waste)	
Carbon Emissions Trading	- Failed to comply with carbon trading requirements on time and in full	- Documents explaining the reason for violation and corrective actions - Written government verification of follow-up rectifications

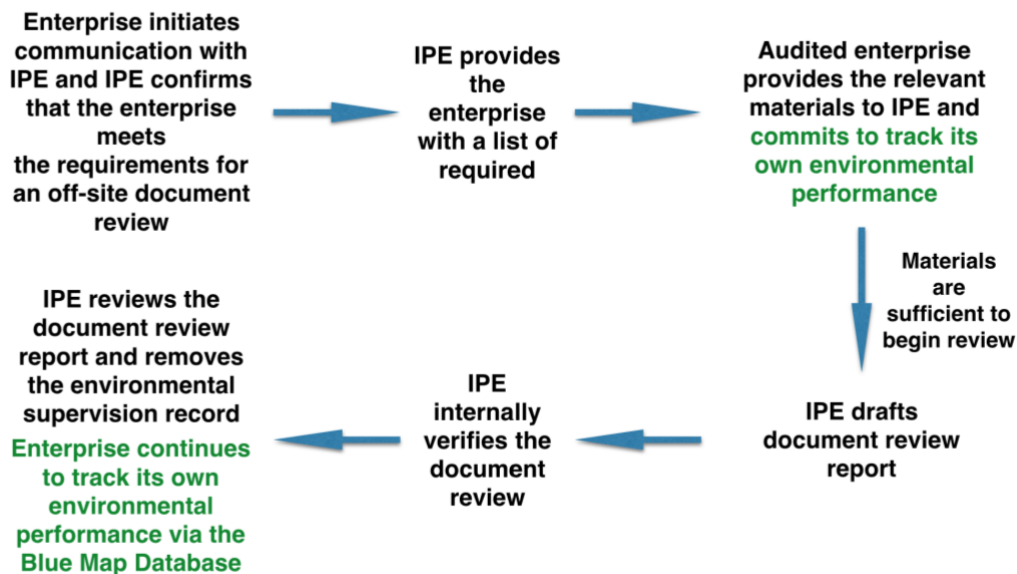


Environmental Impact Assessment	<ul style="list-style-type: none"> <li>- Entity compiling the EIA report was reported due to EIA quality issues</li> <li>- Other violations relating to the agency compiling the EIA</li> </ul>	<ul style="list-style-type: none"> <li>- Written government verification of fulfilling necessary requirements</li> </ul>
Automobile	<ul style="list-style-type: none"> <li>- Did not participate in regular testing of motor vehicle emissions on schedule</li> <li>- Over-discharge of vehicle emissions</li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> <li>- Written government verification of regular testing of motor vehicle emissions</li> </ul>
Supervision record	<ul style="list-style-type: none"> <li>- Information published by the government is erroneous or leads to a misunderstanding</li> <li>- Error by the party responsible for record publication or input</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Document verifying the record is erroneous (such as that day's online monitoring data or third-party test report)</li> <li>- Clarifying document or explanatory statement</li> </ul>
	<ul style="list-style-type: none"> <li>- Error in the government enforcement, e.g. wrong sampling method</li> </ul>	<ul style="list-style-type: none"> <li>- Explanation of circumstances, detailing the reasons why a violation record was received</li> <li>- Clarifying document or explanatory statement</li> </ul>
Other	<ul style="list-style-type: none"> <li>- Over 2 years have passed since the time of violation, and the violation does not fall into one of the above categories<sup>4</sup></li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> <li>- Government documents verifying past corrective actions</li> </ul>
	<ul style="list-style-type: none"> <li>- Over 5 years have passed since the time of violation<sup>5</sup></li> </ul>	<ul style="list-style-type: none"> <li>- Documents explaining the reason for violation and corrective actions</li> </ul>

The off-site document review process to remove environmental supervision records is outlined below.

<sup>4</sup> The time of violation refers to the date the violation occurred, as listed in the supervision record. If the date was not mentioned in the supervision record, then it refers to the date the penalty decisions were issued by the environmental protection departments; otherwise, it refers to the publication time listed by the "supervision record source."

<sup>5</sup> The time of violation refers to the date the violation occurred, as listed in the supervision record. If the date was not mentioned in the supervision record, then it refers to the date the penalty decisions were issued by the environmental protection departments; otherwise, it refers to the publication time listed by the "supervision record source."

**NOTE:**

- (1) All documents issued by the company (that is, documents not provided by third parties) must be stamped with the official seal of the company.
- (2) The documents issued by the Ministry of Ecology and Environment must be stamped with the official seal of the MEE. If the seal is missing, then a full version of the documents signed by government personnel may be provided instead.

**2.2 On-Site Third-Party Audit**

Supervision records issued within the previous two years<sup>6</sup> and/or indicating one of the following situations require the completion of an on-site third-party audit in order to be removed<sup>7</sup>:

- Discharging, dumping and/or disposing of radioactive waste, waste containing pathogens of infectious diseases, and/or toxic substances into Class I drinking water source protected areas and/or core nature protected areas;
- Illegal emissions, dumping, or handling of hazardous waste of three tons or more;
- Illegal discharge of substances containing heavy metals, persistent organic pollutants, and other pollutants which seriously harm the environment and damage human health in excess by three times or more national pollutant discharge standards or pollutant discharge standards

<sup>6</sup> The time of violation refers to the date the violation occurred, as listed in the supervision record. If the date was not mentioned in the supervision record, then it refers to the date the penalty decisions were issued by the environmental protection departments; otherwise, it refers to the publication time listed by the "supervision record source."

<sup>7</sup> IPE reserves the right to final interpretation on all matters. For matters not covered in this document, please contact IPE.

legally set by provinces, autonomous regions and/or provincial-level municipalities;

- Illegally discharge of pollutants by avoiding supervision, such as the use of hidden pipes, or sewage pits (i.e. discharging pollutants through channels apart from legally sanctioned discharge outlets, etc.)<sup>8</sup>, among which:
  - ✓ “Hidden pipes” are sewage pipes set up to achieve the circumvention of supervision through covert methods, including buried cement, porcelain and/or plastic pipes, as well as temporary sewage pipes laid above ground;
  - ✓ sewage pits are closed or semi-enclosed pits, pools, ponds, wells, trenches, canals, etc. that have no anti-leakage measures or are unable to protect against seepage;
- Unlicensed idling or dismantling of pollution prevention and control equipment, resulting in the abnormal operation of such equipment, as well as failure to install pollutant treatment equipment. “Abnormal operation of pollution prevention and control equipment” includes the following situations:
  - ✓ Directly discharging some or all pollutants without first passing through treatment equipment;
  - ✓ Opening the emergency discharge valve of pollutant treatment equipment in a situation other than an emergency and directly discharging some or all pollutants;
  - ✓ Directly discharging untreated pollutants from the intermediary processes of pollutant treatment equipment;
  - ✓ Ceasing operation of pollutant treatment equipment during production or during operational processes;
  - ✓ Use of pollutant treatment equipment in violation of operating procedures, causing the treatment equipment to be incapable of functioning properly;
  - ✓ The pollutant-discharging entity does not perform inspections and repairs in a timely manner or according to regulations after the malfunctioning of pollutant treatment equipment, resulting in the treatment equipment being incapable of functioning properly.
- Illegal discharge of pollutants by tampering with and forging monitoring data in order to evade supervision, including the following situations:
  - ✓ Violating national regulations by making deletions, additions or alterations to or otherwise interfering with pollution source control systems, or making deletions, additions or alterations to the records, processing and/or transmission of data and application procedures of pollution source control systems, thus causing such systems to be incapable of functioning properly;
  - ✓ Destroying and/or damaging monitoring equipment, communication lines, information acquisition and transmission equipment, video equipment, electrical equipment, air conditioners, fans, sampling pumps and other monitoring equipment, as well as destroying or damaging the sampling lines of monitoring equipment,

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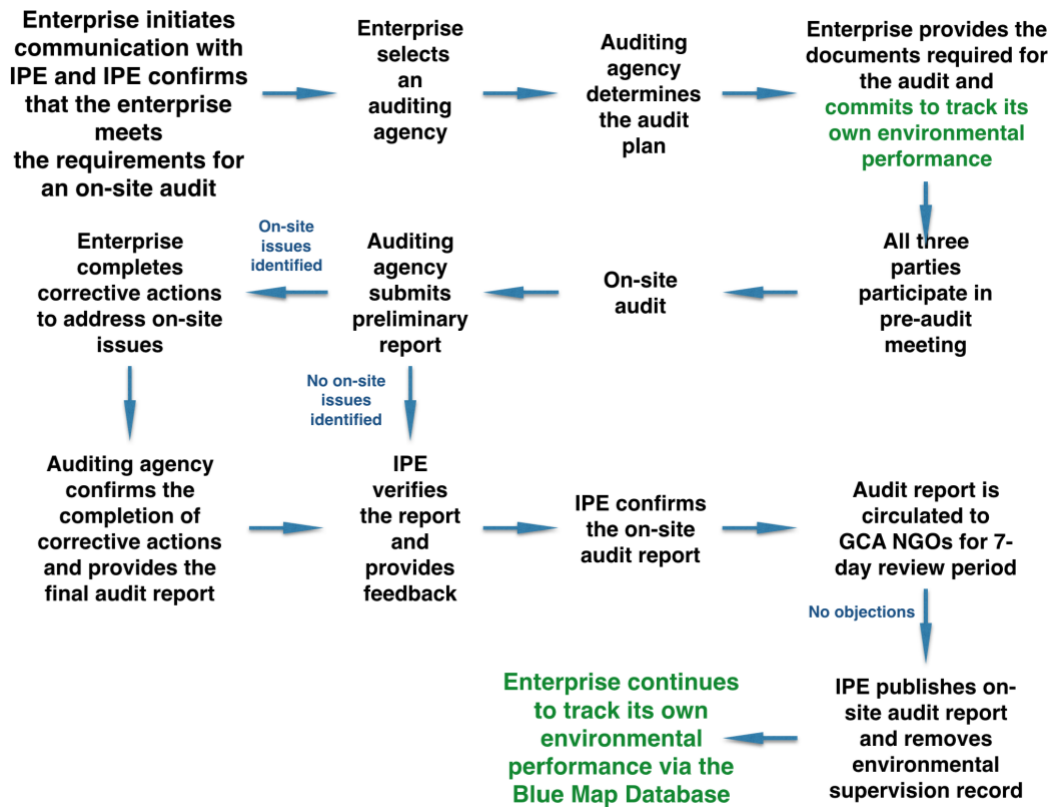
<sup>8</sup> Not limited to records with a publication date within the previous two years.

- monitoring instruments, and/or meters.
  - ✓ Intentionally diluting discharged pollutants in order to interfere with monitoring data;
  - ✓ Other situations that prevent monitoring and monitoring equipment from functioning properly.
- Illegal emissions of pollutants exceeding national pollutant discharge standards or pollutant emissions standards legally established by the governments of provinces, autonomous regions, or provincial-level municipalities; discharging pollutants in excess of key pollutant volume control standards;
  - Enterprise receives a red or black environmental credit rating;
  - Enterprise receives a yellow environmental credit rating, and the reason for the yellow rating involves issues relating to wastewater, air emissions, and/or solid waste disposal;
  - Refusal to carry out the requirements of fines, orders to suspend production or cease production, administrative detention, temporary suspension or revocation of permits, temporary suspension or revocation of sales licenses, and other administrative punishments, including the following instances:
    - ✓ Construction project did not carry out environmental impact assessment according to law and has been ordered to cease construction, yet refuses to do so;
    - ✓ Violation of laws and regulations due to the failure to obtain a pollution discharge permit; enterprise receives an order to cease discharge, yet refuses to do so.
  - Records indicating that the enterprise was listed for supervision, daily penalties, seizure of property and/or assets, or administrative detention that was transferred to the Ministry of Public Security; ordered to halt production; or reported due to a significant environmental accident;
  - Obstruction of environmental supervision inspection or sudden environmental incident investigation;
  - Enterprise is reported for a major environmental accident, such as a liquid or gas leakage, or spillage of slag or mining waste;
- Other circumstances that seriously pollute the environment.

### **2.2.1 Overview of On-Site Audit Procedure**

On-site third-party audits are carried out by IPE-approved third-party auditing companies (hereinafter referred to as “auditing agencies”). The audit is aimed at verifying the enterprise’s pollution management and control status.

IPE or another environmental NGO in the Green Choice Alliance will review and monitor the audit process. There is no fee charged for the audit procedure, although the company must provide reimbursement for their round-trip transportation, accommodations and other required costs.



### 2.2.2 Relevant Responsibilities of Participating Parties

Responsibilities of the participating enterprise, auditing agency, and IPE or other environmental NGOs in the Green Choice Alliance (GCA) over the course of the on-site audit are as follows:

- a) The audited enterprise should:
  - Arrange relevant personnel to cooperate with the auditing agency throughout all audit processes;
  - Commit to disclose the audit results and report to the public;
  - Assume all audit costs;
  - Push all suppliers with existing environmental supervision records (including thermal power plants, centralized wastewater treatment plants, hazardous waste transporters and processors, other pollutant operations and treatment facilities, and outsourced facilities that include pollutant production segments to issue public explanations of their environmental supervision record(s).
- b) The auditing agency should:
  - Designate an audit team<sup>9</sup> to conduct the audit (at least one principal auditor must

<sup>9</sup> If the audit team desires to change its personnel, it must inform IPE in advance and receive final confirmation from IPE.

- participate in and lead the audit) and ensure the audit is carried out objectively and impartially;
  - Maintain responsive communication channels with IPE and the audited company; communicate in a timely fashion with the audited enterprise about the audit, and promptly submit feedback toward IPE’s views;
  - As a professional team, resolve any doubts regarding the audit expressed by IPE or the GCA environmental NGO in a timely fashion. The audit team shall make professional expert judgements and provide reasonable regulatory explanations for issues discovered during the course of the on-site audit;
  - Maintain confidentiality toward the financial and technological information as well as brand customer information provided by the audited enterprise.
- c) IPE or other Green Choice Alliance (GCA) NGOs should:
- Supervise the on-site audit and verify that the audit is conducted according to regular procedures;
  - Maintain strict confidentiality toward the financial and technological information as well as brand customer information provided by the audited enterprise;
  - Publicly disclose the audit report and results.

Responsibilities of each participating party during the auditing process (the audited enterprise, the auditing agency, and IPE or other environmental NGO in the Green Choice Alliance) are as follows:

Audit Segment	Relevant Responsibilities of Participating Parties		
	Enterprise	IPE	Auditing Agency
Audit confirmation	Accept the conditions of the audit and commit to carrying out a third party on-site audit	Provide the audit standards and a list of approved auditors	N/A
	<ul style="list-style-type: none"> <li>- Choose an auditing company</li> <li>- Submit the required documents (See Appendix 2)</li> <li>- Pay audit fees</li> </ul>	Verify the credentials of the auditing company	<ul style="list-style-type: none"> <li>- Confirm with the enterprise that all of the items on the violation record have been corrected; that any corporate confidentiality policies are signed at this time; and that, if necessary, any subsequent corrective actions will also be reviewed by the auditing agency</li> <li>- Confirm audit time and plan with the IPE coordinator, enterprise and participating representatives of the Green Choice Alliance at least two weeks in advance</li> </ul>

			<ul style="list-style-type: none"> <li>- Read and review documents submitted by the enterprise, and submit at least the enterprise license, EIA approval, and pollution facility examination approval to IPE;</li> <li>- Submit the enterprise status collection form to IPE</li> <li>- Organize pre-audit three-party meeting at least one week before the audit to confirm the audit procedure, purpose, scope and content with the enterprise</li> </ul>
On-site audit	<ul style="list-style-type: none"> <li>- Confirm that manufacturing activities at the enterprise undergoing the audit are being carried out normally; production lines are running normally; production load is at more than 75% capacity, and treatment systems for relevant wastewater and air emissions are running normally</li> <li>- Organize relevant personnel to host the on-site audit, cooperate with the audit team, and provide accurate and honest information</li> <li>- Sign audit statement (see Appendix 4)</li> <li>- Register an account on the Blue Map website and complete PRTR forms for the past two years; upload the data source documents</li> </ul>	<ul style="list-style-type: none"> <li>- Supervise the on-site audit (or arrange GCA environmental organization to serve as the NGO representative and supervise the audit)</li> <li>- Promptly inform the auditing company of anything that could affect the normal auditing procedures</li> <li>- Communicate on-site audit findings</li> <li>- Verify that the audit process was normal</li> <li>- Sign audit statement (Appendix 4)</li> </ul>	<ul style="list-style-type: none"> <li>- Chair the on-site audit opening meeting, introducing the purpose of the audit, key content and format, assigned roles, audit schedule and matters needing attention; and confirm that there are no other outstanding violation records, or any other pertinent information</li> <li>- Acquire a site plan and flow chart of pollution treatment facilities; confirm that documents may be copied and photos may be taken</li> <li>- Lead the on-site document audit, on-site investigation, interviews, and sampling (if necessary)</li> <li>- Confirm on-site findings with participating environmental NGOs</li> <li>- Sign audit statement (Appendix 4)</li> <li>- Review the completeness and accuracy of the enterprise's PRTR data sheets for the past two years; confirm that the data source documents have been uploaded completely</li> <li>- Host final meeting after audit is completed<sup>10</sup>; summarize findings of how the audited enterprise can improve, inform enterprise of audit results and on-site findings; discuss a follow-up plan and provide/show the audited enterprise assisting sources for subsequent rectification.</li> </ul>
Preliminary	<ul style="list-style-type: none"> <li>- Provide</li> </ul>	Obtain and check the	<ul style="list-style-type: none"> <li>- Write preliminary audit report</li> </ul>

<sup>10</sup> If the IPE coordinator does not participate in the on-site inspection, the auditing agency must call or email the IPE coordinator to communicate the on-site audit findings before the final meeting.

audit report preparation	supplementary documents that cannot be provided on-site - Obtain preliminary audit report	preliminary audit report, and provide feedback	- Send report to IPE to verify and to the audited enterprise
Follow-up	- Carry out corrective actions related to non-compliances discovered during the audit; provide true and accurate information - If a follow-up supplementary audit is required, prepare the necessary staff to take part	- Track progress of enterprise follow-up actions - Supervise the supplementary on-site audit, and promptly communicate with the auditing agency about any circumstance that may affect the normal implementation of the audit - Verify and provide feedback on the final audit report	- Clarify the nature of the enterprise’s environmental violation record, track progress of enterprise’s follow-up actions, and conduct follow-up audit if necessary - Conduct evaluation of the effectiveness of corrective actions and draft the final audit report; - Follow up with the PRTR data form until it is published - Send report to IPE to verify and to the audited enterprise (See Appendix 3 for template and writing requirements) - Complete the final audit report based on IPE’s feedback
Publication of audit conclusions	N/A	- Confirm audit report - Circulate audit report to other GCA NGOs for a review period of 7 days. If there are no objections, then the corporate environmental supervision record may be removed from the Blue Map Database	N/A

NOTE: IPE or GCA environmental NGOs cannot accept any cash or gifts from the audited enterprise in any form whatsoever and cannot charge consulting fees. However, they may claim transportation and accommodation expenses, which should be included in the total cost of the audit covered by the audited enterprise.



### 2.2.3 Scope of On-Site Third-Party Audit

The auditing agency shall conduct the on-site audit based on relevant laws, regulations and standards for environmental protection (see Annex 1). The audit shall cover the following:

#### (1) Planning

##### **Identification of relevant factors and establishment of control plans**

- a) Evidence must be provided to demonstrate that during the factory design, construction and operation phases, the audited enterprise has carried out required environmental protection measures and environmental assessments, and has acquired necessary environmental permits from relevant environmental administrative departments according to the “three synchronizations” system;
- b) Before major alterations occur in the nature of production, production technology, scale, workshops, equipment, etc., the enterprise should further identify risk factors related to pollutant management and control, and draft relevant control plans and measures;
- c) The enterprise should demonstrate that it has already carried out necessary pollutant control measures to manage the risks identified in relevant assessment reports.

##### **Compliance requirements**

- a) The enterprise must demonstrate its understanding of each requirement related to pollutant management laws, regulations and technology standards, such as: requirements for pre-treatment, pollutant concentration limits for effluent, limits on the total quantity of discharged pollutants, monitoring requirements, etc. The enterprise should be able to demonstrate its understanding of how the regulations and standards are applied to standard business operations;
- b) The enterprise should prepare relevant procedures to demonstrate its understanding of the latest pollutant management regulations, and provide evidence to verify that control programs and measures are in place and sufficient to attain compliance with relevant environmental regulations.

#### (2) Operation and Implementation

##### **Risk management resources, roles, responsibilities and authority**

- a) The enterprise shall demonstrate adequate resources for management and control plans related to risk factors, including human resources, technical training and expertise, as well as financial resources for relevant facilities, equipment and technology.
- b) A qualified manager should be in charge of the overall pollutant management plan and operations. For management of other factors related to pollutant management, the enterprise should appoint qualified personnel and define their responsibilities and levels of authority.

**Capacity-building and training**

- a) The enterprise should ensure that the personnel responsible for the control of pollutant risk factors have the necessary technical capacity, as assessed based on their level of education, training, and experience. The enterprise should also provide materials to verify that personnel are adequately qualified.
- b) The enterprise should organize trainings (internal or external) to ensure that personnel understand pollutant management conditions encountered in the workplace, and are able to manage and control the risk factors according to the programs and measures established by the enterprise. All trainings should be documented (e.g. time, place, content, and attendees).

**Operations management**

- a) The enterprise must prove that it has established procedures and operational regulations that ensure safe and compliant normal operating procedures for pollutant management, and regular maintenance of facilities and equipment.
- b) The enterprise must prove that it has established procedures to ensure timely internal (managers and operators) and external (environmental administrative department and other interest parties) communication related to pollutant treatment and management.

**Emergency and accident management**

- a) The enterprise must verify that it has conducted a pre-assessment of potential risk factors related to pollutant discharge accidents. It must demonstrate that it has set up corresponding safeguard management procedures, personnel, facilities and equipment for emergency monitoring to ensure the adequate management of potential risks. The enterprise must verify that it conducts regular emergency response trainings, and regularly verifies the status of relevant equipment in order to ensure early response to emergencies and minimize the harmful effects of accidents.
- b) The enterprise must provide evidence that it has set up internal (enterprise headquarters) and external (administrative department and other interested parties) accident notification procedures.
- c) The enterprise must provide evidence that it has established accident investigation procedures to ensure early identification of an accident's root cause and means to identify responsible personnel or system failure. A system should also be installed to analyse the accident after the fact, and determine a rectification plan to avoid similar accidents in the future.
- d) All accidents and accidents investigations should be clearly documented.

**(3) Inspection****Monitoring and recording**

- a) The enterprise shall regularly assess the working routines of relevant personnel as well as the operations status of facilities and equipment. All assessment and maintenance records

should be documented.

- b) According to relevant laws and regulations, all pollutants generated should be regularly measured and monitored. The monitored parameters should be determined according to the characteristics of the pollutants generated. Records of sampling processes and analysis results should be saved.
- c) If the enterprise conducts pollutant monitoring internally, equipment and chemicals for monitoring should be periodically calibrated to ensure the accuracy of the monitoring results. Evidence of these activities should be provided.

#### **Rectification and prevention measures**

- a) The enterprise should set up rectification procedures for the timely improvement of non-compliance identified in any assessments. Records of such procedures and improvement efforts should be documented.
- b) The enterprise should establish risk-prevention procedures for potential risks as identified in the assessment process.
- c) The enterprise should set up monitoring and assessment procedures of all rectification and prevention measures to ensure the validity of measures taken to fix non-compliant processes or equipment.

Note: If, during the course of the off-site document review and on-site third-party audit, the enterprise conceals facts, or forges or fabricates documents, influencing the audit judgments and audit conclusions, upon such a discovery, IPE will reinstate the removed environmental supervision record. If the record has not yet been fully removed, then the enterprise must first publicly disclose an explanation of the aforementioned concealment of facts and/or forged or fabricated documents.

## Appendix 1: Relevant Laws, Regulations and Standards

### 1. Including but not necessarily limited to the following laws and regulations:

- a) Environmental Protection Law of the People's Republic of China (PRC)
- b) Water Pollution Prevention and Control Law of the PRC
- c) Air Pollution Prevention and Control Law of the PRC
- d) PRC Law on the Prevention and Control of Environmental Pollution from Solid Waste
- e) Environmental Impact Assessment Law of the PRC
- f) Measures for the Environmental Management Registration of Hazardous Chemicals (Trial)
- g) Measures on the Management of Hazardous Waste Manifests
- h) Cleaner Production Promotion Law of the PRC

### 2. Including but not necessarily limited to the following standards:

#### Wastewater

- a) Integrated Wastewater Discharge Standard (GB8978–1996)
- b) Wastewater Quality Standards for Discharge to Municipal Sewers (GB/T31962-2015)
- c) Technical Requirements for Monitoring of Total Amount of Pollutants in Wastewater (HJ/T 92—2002)
- d) Technical Specification Requirements for Monitoring of Surface Water and Wastewater (HJ/T 91—2002)
- e) Environmental Management Systems – Requirements with Guidance for Use (GB/T24001-2016)

#### Air Emissions

- a) Integrated Emission Standard of Air Pollutants (GB16297-1996)
- b) Emission Standards for Odor Pollutants (GB 14554-1993)
- c) Technical Specifications for Emissions Monitoring of Stationary Sources (HJ/T 397-2007)
- d) Technical Guidelines for Fugitive Emission Monitoring of Air Pollutants (HJ/T 55-2000)
- e) Test Regulations for Cooking Fume Control Equipment (Trial) (HJ/T 62-2001)
- f) Environmental Management Systems – Requirements with Guidance for Use (GB/T24001-2016)

#### Solid Waste

- a) Rules for Storage of Dangerous Chemicals (GB 15603-1995)
- b) Standard for Pollution Control on the Storage and Disposal Site for General Industrial Solid Wastes (GB18599-2001)
- c) Standard for Pollution Control on Hazardous Waste Storage (GB 18597-2001)

3. **Including but not necessarily limited to the following documents:**
  - a. Interim Measures on the Transfer between Administrative Departments of Cases of Environmental Violations for which Administrative Detention May Be Applied
  - b. Interpretation of the Supreme People’s Court and the Supreme People’s Procuratorate on Several Issues Concerning the Application of Law in the Handling of Criminal Cases of Environment Pollution

Note: The most up-to-date version of the above laws, regulations and technical standards issued by the government or industry bodies shall prevail.

## Appendix 2: List of Documents Required to be Submitted for On-Site Audits

Including but not necessarily limited to:

**a) General information about the audited enterprise**

- Enterprise name, address and operations history
- Information related to main facilities and the surrounding geographic area (including the total floor plan of the plant)
- Product information and production scale
- Number of employees, business-operating time and work shifts

**b) Documentation on production processes and pollutant production and discharge:**

- Production flow chart
- List of key raw materials
- For documentation related to pollutant generation, enterprises shall provide information on pollutant output per product unit and the variety, quantity and concentration of main pollutants.
- Relevant fugitive emissions information
- Relevant information on the discharge of air pollutants not from production

**c) Information about pollution treatment facilities and equipment:**

- Pollutant collection mode (including pollutant pipe network map)
- Pollutant treatment process and related design documentation
- Mode of pollutant discharge
- Sludge treatment and disposal methods

**d) If the enterprise has received any violations or penalties from relevant environmental authorities that involve the implementation of corrective actions or punishments, the enterprise shall provide detailed information about the violation(s), including the following:**

- Time and place of the violation(s)
- Officially published information
- Internal survey results and environmental remediation information
- Official follow-up inspection records

**e) Annual environmental data for the past two years (PRTR form)**

**f) Additional information that the enterprise deems closely relevant to the audit**

## Appendix 3: GCA On-Site Audit Report Template and Writing Requirements

### XX Company On-Site Audit Report<sup>11</sup>

**Third-Party Auditing Agency: XXX**

**Auditors: XXX**

**Report Author: XXX**

**Report Reviewer: XXX**

**Date: XXXX-XX-XX**

#### 1. BACKGROUND

On DD/MM/YYYY, XX published 《XX document》 demonstrating that “.....XX company .....” According to this report, the Institute of Public and Environmental Affairs (IPE) included a YYYY (year) corporate environmental supervision record incurred by XX company in the Blue Map.

#### 2. ON-SITE AUDIT CONCLUSION

XX company commissioned XX auditing agency to conduct a third-party on-site audit. On DD/MM/YYYY, XX auditing agency carried out an X-day on-site investigation, reviewed related documents, and wrote an on-site audit report. The report addresses: the reason for the violation record, the corrective measures, and a conclusion as to whether or not the corrective actions were effective.

#### 3. AUDIT AND FINDINGS

##### 1.1 AUDIT PROCESS

**Document Review:** XX auditing agency reviewed documents related to the environmental management of XX company. The list of documents is as follows: (Please clearly list all documents related to the on-site audit.)

**Site Survey:** The on-site investigation began from the source of pollutants. XX auditing agency conducted an on-site investigation into XX company's site production activities, emission standards and environmental permits, wastewater, waste gas, solid waste treatment and disposal; and conducted interviews with related management and operation personnel.

##### 1.2 AUDIT FINDINGS

On DD/MM/YYYY, XX auditing agency submitted the preliminary version of the “XX Company On-site Audit Report”. The report demonstrates that XX company has taken positive rectification

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<sup>11</sup> For a complete list of writing requirements, please refer to the Chinese version of this document.

measures for the YYYY violations; at the same time, there are still some problems that need further improvement.

This review found that XX company's compliance issues and continuous improvement issues are as follows: (Please state the specific content of the violations of laws and regulations. Except for compliance issues, everything else will be designated as a continuous improvement issue.)

**4. FOLLOW-UP RECTIFICATION**

After the review, XX company carried out subsequent rectification of the problems found in the audit. On DD/MM/YYYY, XX auditing agency submitted the final report of “XX Company On-site Audit Report”. The report finds that XX company carried out subsequent rectification of the problems found in the on-site audit. The detailed rectification contents and results are listed in the table below.

Number	Compliance Issue	Corrective Action	Supporting Document
...			

Number	Issue for Continuous Improvement	Corrective Action	Supporting Document
...			

**5. CORPORATE EMISSIONS DATA DISCLOSURE**

CORPORATE POLLUTANT RELEASE AND TRANSFER REGISTRY ( PRTR FORM )

See link:



## Appendix 4: GCA On-Site Audit Statement

### Audit Overview

Audit Date: \_\_\_\_\_

Audited Enterprise: \_\_\_\_\_

Third-Party Auditing Agency: \_\_\_\_\_

NGO Participants: \_\_\_\_\_

### Audited Enterprise Obligations:

1. Provide accurate and reliable documents, data and other information;
2. Accept disclosure of the audit report to the public;
3. Does not provide cash or gifts to the auditing agency and/ or NGOs in any form whatsoever.

**Audited Enterprise Signature:** \_\_\_\_\_

### Auditing Agency Obligations

1. Carry out the audit objectively and impartially; assess whether the enterprise's operations management is able to fulfill the requirements of relevant laws, regulations and technical standards;
2. Based on the requirements laid out in the Guide to Addressing and Removing Corporate Environmental Supervision Records, ensure the integrity of the auditing process and accuracy of auditing results, and reject any falsified materials;
3. Ensure that products or services are not advertised or commercialized;
4. Does not receive cash or gifts from the audited enterprise in any form whatsoever.

**Auditing Agency Signature:** \_\_\_\_\_

### Environmental NGO Participant Obligations:

1. Participate and supervise the audit according to the requirements laid out in the Guide to Addressing and Removing Corporate Environmental Supervision Records;
2. Does not receive cash or gifts from the auditing enterprise or auditing agency in any form whatsoever.

**NGO Representative Signature:** \_\_\_\_\_

**Appendix 5: Green Choice Alliance NGO Members**

No.	环保组织清单 NGO List	
1	Friends of Nature	自然之友
2	Global Village Beijing	地球村
3	Green Earth Volunteers	绿家园志愿者
4	Global Environmental Institute	全球环境研究所
5	Huaihe River Guardians	淮河卫士志愿者协会
6	Gansu Green Camel Bell	甘肃绿驼铃
7	Friends of Green in Tianjin	天津绿色之友
8	Beijing Association of Sustainable Development	北京市可持续发展促进会
9	Center for Legal Assistance to Pollution Victims	中国政法大学污染受害者法律帮助中心
10	Chongqing Green Volunteer Federation	重庆市绿色志愿者联合会
11	Green Hunan	绿色潇湘环境咨询中心
	Hubei Green Hanjiang	襄樊市环境保护协会 (绿色汉江)
13	Xinjiang Conservation Fund	新疆自然保育基金
14	Lvse Jiangnan	苏州工业园区绿色江南公众环境关注中心
15	Yunnan Green Watershed	云南大众流域
16	Wenzhou Green Eyes	温州绿眼睛
17	Dalian Environmental Protection Volunteers Association	大连市环保志愿者协会
18	Green Island	绿岛
19	Green Beagle	北京市朝阳区达尔问环境研究所
20	Shanghai Oasis Ecological Conservation & Communication Center	上海绿洲生态保护交流中心
21	Shaanxi Women's Federation "Red Phoenix Project"	陕西省红凤工程志愿者协会
22	Friends of Green Environment	江苏绿色之友
23	Green Longjiang	绿色龙江
24	Green Anhui	安徽绿满江淮环境发展中心
25	Green Zhujiang	绿色珠江
26	Green River	绿色江河环保促进会
27	Blue Dalian	蔚蓝大连
28	Fujian Green Home	福建省绿家园环境友好中心
29	South China Nature Society	华南自然会
30	Green Kunming	绿色昆明
31	Chongqing Liangjiang Voluntary Service Center	重庆两江志愿者服务发展中心

32	Institute for Environment & Development	道和环境与发展研究所
33	Zhaolu Environmental Protection and Commonweal Service Center	朝露环保公益服务中心
34	Green Stone Environmental Action Network	绿石环境行动网络
35	Green Zhejiang	绿色浙江环保组织
36	Green Panjin	绿色盘锦
37	Gull Protection Association of Panjin City	盘锦市黑嘴鸥保护协会
38	Xiamen Greencross Association	厦门市绿十字环保志愿者中心
39	Hebei Green Sound	河北绿色之音
40	Nature University	自然大学 (北京市丰台区源头爱好者环境研究所)
41	Wuhu Ecology Center	芜湖生态中心
42	Wild China	野性中国
43	Wuling Mountains Conservation Federation	武陵山生态环境保护联合会
44	Fujian Environmental Protection Volunteers	福建省环保志愿者协会
45	Greenovation Hub	创绿中心
46	Lanzhou University Center for Rural Development and Biodiversity Protection	兰州大学社区与生物多样性保护研究中心
47	Wuhan Green Canaan	武汉绿江南环境咨询有限公司
48	Shenzhen Spring Environmental Protection Volunteer Association	深圳绿源环保志愿者协会
49	Institute of Public & Environmental Affairs	公众环境研究中心
50	Qinggan Environmental Exchange Center	青赣环境交流中心
51	Green Qilu	济南市绿行齐鲁环保公益服务中心
52	Green Oxygen Ecological & Environmental Protection Center	成都市锦江区绿氧生态环境保护中心
53	Xinxiang Environmental Protection Volunteer Association	新乡市环境保护志愿者协会
54	EnviroFriends	环友科学技术研究中心
55	Green Waterkeeper Environmental Center	厦门市湖里区绿水守护者生态环保中心
56	Xingche Environmental Commonweal Development Center	武汉行澈环保公益发展中心
57	Huangdao District Qingyuan Environmental Protection Public Service Center	青岛市黄岛区清源环保公益服务中心
58	Green Hebei	石家庄印渝环保科技有限公司(绿行太行)
排名不分前后 (No particular order in listing)		